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Submissions Report

for the

Monaro Rock Quarry

Development Application No. SSD- 27223807



Prepared by:

RWCorkery&co

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Document prepared for

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Acknowledgement

R.W. Corkery & Co. acknowledge and pay our respects to the Traditional Custodians of the lands in NSW and Australia on which our projects are located. We value the knowledge, advice and involvement of the Elders and extended Aboriginal community that contribute to our Projects and extend our respect to all Aboriginal and Torres Strait Islander peoples.

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Acronyms

ACHAR	Aboriginal Cultural Heritage and Archaeological Report
ACHMP	Aboriginal Cultural Heritage Management Plan
ACT	Australian Capital Territory
AHIMS	Aboriginal Heritage Information Management Systems
ANZECC	Australian and New Zealand Environment for Conservation Council
AQIA	Air Quality Impact Assessment
AQMP	Air Quality Management Plan
ARMCANZ	Agriculture and Resource Management Council of Australia and New Zealand
AWS	Automatic Weather Station
BAM	Biodiversity Assessment Method
BDAR	Biodiversity Development Assessment Report
BGW	Box Gum Woodland
BRMP	Biodiversity and Rehabilitation Management Plan
CPHR	Conservation Programs, Heritage and Regulation Group
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DECC	Department of Environment and Climate Change
DECCW	Department of Environment, Climate Change and Water
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure
DPIA	Department of Primary Industries – Agriculture
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act
EPL	Environment Protection Licence
EVs	Environmental Values
FOG	Friends of Grasslands
GHG	Greenhouse Gas
HHRA	Human Health Risk Assessment
LGA	Local Government Area
LUCRA	Land Use Conflict Risk Assessment
MDB	Murray–Darling Basin
NCA	Noise Catchment Area
NO ₂	nitrogen dioxide

NO _x	oxides of nitrogen
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
PAD	Potential Archaeological Deposit
PCT	Plant Community Types
PM	Particulate Matter
RAPs	Registered Aboriginal Parties
RCS	respirable crystalline silica
RFS	Rural Fire Service
RWC	R.W. Corkery & Co. Pty Limited
SAII	Serious and Irreversible Impact
SEARs	Secretary's Environmental Assessment Requirements
SEEC	Strategic Environmental and Engineering Consulting
SIA	Social Impact Assessment
SWMR	Surface Water Management Report
TARP	trigger action response plan
TBDC	Threatened Biodiversity Profile Data Collection
TCEQ	Texas Commission on Environmental Quality
TfNSW	Transport for NSW
TSP	Total Suspended Particulates
TTPP	The Transport Planning Partnership
VLAMP	Voluntary Land Acquisition and Mitigation Policy
VOCs	Volatile Organic Compounds
VPA	Voluntary Planning Agreement
WRI	World Resources Institute

1. Introduction

1.1 Scope

This Submissions Report has been compiled to provide a response to the key issues raised in submissions lodged with the Department of Planning, Housing and Infrastructure (DPHI) during the exhibition period for the Environmental Impact Statement (EIS) for the Monaro Rock Quarry (the Project) proposed by Monaro Rock Pty Ltd (the Applicant). The EIS and supporting Specialist Consultant Studies Appendices A to N were exhibited by DPHI from 27 August 2025 to 24 September 2025. During that period, 514 submissions were received by DPHI from the public, community organisations and government agencies.

As more than 50 submissions by way of objections were received by DPHI during the public exhibition of the EIS, in addition to the objection from Queanbeyan-Palerang Regional Council, the development application will be determined by the Independent Planning Commission, acting under the delegation of the Minister for Planning. DPHI will prepare an assessment report and provide recommended conditions of consent to assist with this process. The Applicant is confident that the issues raised in various submissions have been addressed satisfactorily and that the concerns and objections raised in the submissions have been appropriately identified and addressed.

The Applicant considers that this Submissions Report, when reviewed with the EIS and supporting documents, provides sufficient information for the Independent Planning Commission to determine the development application.

1.2 Document Format

This report has been compiled in six sections with a set of nine appendices.

- Section 1: introduces the report and provides a guide to Project related documentation.
- Section 2: provides an analysis of the submissions received from Government agencies, organisations and individuals in the community who either support or oppose the Project.
- Section 3: describes a range of actions that have been taken directly arising from the content of submissions.
- Section 4: provides a comprehensive set of responses to the matters raised by the Government agencies, community organisations and individuals.
- Section 5: provides an updated evaluation of the Project in light of the responses provided and additional actions outlined in Section 3.
- Section 6: lists the documents referenced throughout the report.

A set of appendices is provided to support the report addressing the following.

1. Register of submitters and matters raised
2. Updated Air Quality Impact Assessment
– prepared by Northstar Air Quality Pty Ltd
3. Noise and Vibration Impact Assessment (Updated)
– prepared by Octave Acoustics)
4. Surface Water Management Report (Updated)
– prepared by Strategic Environmental and Engineering Consulting
5. Aboriginal Cultural Heritage and Archaeological Report (Updated)
– prepared by Past Traces Pty Ltd
6. Road Transport Assessment (Updated)
– prepared by The Transport Planning Partnership
7. Biodiversity Development Assessment Report (Updated)
– prepared by Capital Ecology Pty Ltd
8. Land Use Conflict Risk Assessment
– prepared by R.W. Corkery & Co Pty Limited
9. Updated summary of environmental management and monitoring measures

2. Analysis of Submissions

2.1 Overview of Submissions

During the exhibition period, 514 submissions were received by DPHI from the public, community organisations and government agencies and included the following.

- 488 submissions from the public.
- 14 submissions from organisations.
- 11 submissions from a Government Agency objecting to the Project

A comprehensive register of the submissions received including the matters raised in each submission is presented in **Appendix 1**. It is noted that the categorisation of submissions as public or organisation was completed by the submitter with some 'organisation' submissions appearing to have been prepared by individuals in the public.

2.2 Submitter Location

Table 2.1 provides a detailed overview of the location of organisation and individual submitters. The majority of submissions were provided from residents within suburbs in the vicinity of the Project.

The majority of submissions were provided by residents of Royalla (44%), Tuggeranong (27%) and Googong (14%). Other locations for submissions included predominantly other suburbs within the ACT or the Queanbeyan-Palerang region. The majority of supportive submissions were from similar suburbs, reflecting the local interest in the Project.

Table 2.1
Organisation and Individual Submitter Origins

Submitter Location	Support (No.)	Object (No.)	Comment (No.)	Total No. Submissions	Support (%)	Object (%)	Comment (%)
Royalla	1	221	1	223	0.45	99.10	0.45
Organisation	0	2	0	2	0.00	100.00	0.00
Individual	1	219	1	221	0.45	99.10	0.45
Tuggeranong	3	132	1	136	2.21	97.06	0.74
Organisation	0	1	0	1	0.00	100.00	0.00
Individual	3	131	1	135	2.22	97.04	0.74
Googong	1	67	0	68	1.47	98.53	0.00
Organisation	0	0	0	0	0.00	0.00	0.00
Individual	1	67	0	68	1.47	98.53	0.00
Other	14	56	5	75	18.67	74.67	6.67
Organisation	1	7	2	10	10.00	70.00	20.00
Individual	13	49	3	65	20.00	75.38	4.62
Total	19	476	7	502	3.78	94.82	1.39

2.3 Government Agency Submissions

Advice on the Application was received from the following Government Agencies.

- Queanbeyan-Palerang Regional Council (Council)
- City and Environment Directorate (ACT).
- Department of Planning, Housing and Infrastructure – Crown Lands (DPHI Crown Lands).
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) - Conservation Programs, Heritage and Regulation Group (CPHR).
- DCCEEW – Heritage NSW
- DCCEEW – Water Group
- NSW Department of Primary Industries and Regional Development, Agriculture and Biosecurity.
- NSW Environment Protection Authority (EPA).
- NSW Rural Fire Service (RFS).
- The Murrumbidgee and Southern NSW Local Health District Public Health Unit.
- Transport for NSW (TfNSW).

Council provided two submissions, with a supplementary submission prepared following a Council meeting held after the exhibition period was completed. Council objected to the Project based on cumulative environmental impacts and the location of the Project Site in a rural residential area which impacted the suitability of the site and key matters relating to the IPC's evaluation of the Project under Section 4.15 of the EP&A Act. Council's objecting submission generally reflected the communities' priorities and concerns.

The submission prepared by the City and Environment Directorate of the ACT Government commented on a range of matters relating to impacts that may occur within the ACT. It was requested that an updated traffic assessment be prepared informed by more recent traffic survey outcomes.

All other Government agency submissions commented on the Project and related directly to the matters administered by the respective agencies.

2.4 Public Submissions

The organisation and individual submissions for the Project consisted of:

- 476 objections (95%);
- 19 supportive (4%); and
- 7 comments (1%).

There were a large range of matters raised in submissions from organisations and the public.

The most frequently raised matter was risk associated with dust and air quality (63% of objections) which are also associated with silica dust generation (61%) and respiratory health risks (54%). Other key matters raised in submissions were:

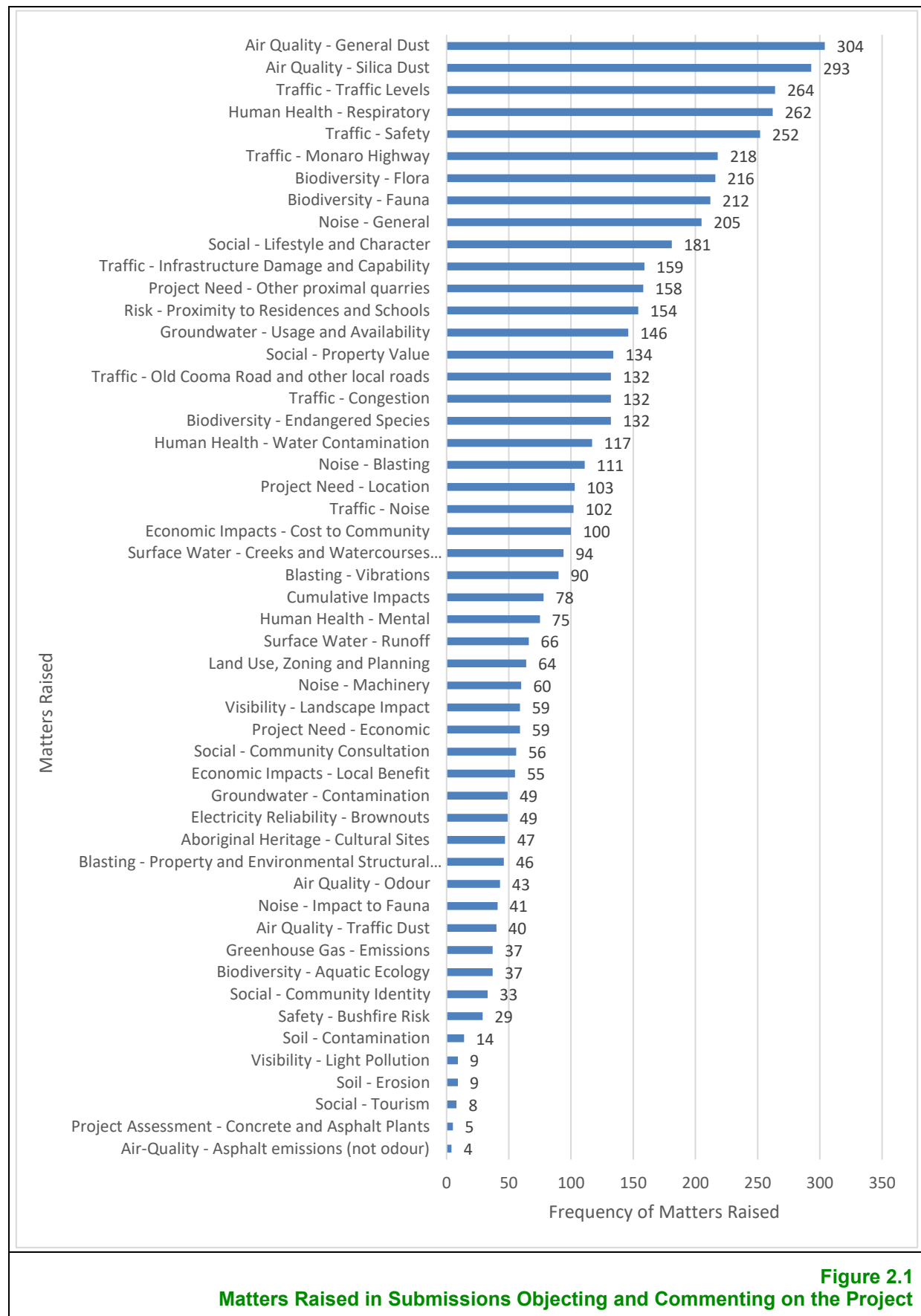
- Traffic matters, with the largest focus on traffic safety (51%), increased traffic levels (53%), and use of the Monaro Highway (44%).
- Biodiversity, with the largest focus on flora (43%) and fauna (42%).
- General noise (41%).
- Threats to community lifestyle and character (36%).

Figure 2.1 provides a detailed overview of the frequency of matters raised in submissions.

Submissions supporting the Project raised the following matters as benefits or positive aspects of the Project

- The local economic benefit including local jobs that the Project would contribute (89% of supporting submissions).
- The need for the Project given declining resource availability in the locality (37%).
- Support for the Project's commitments to mitigate dust and noise risks including through the construction of a dedicated Quarry Access Road to separate the Project from private residences (16%).

Other areas of support included the need for the Project in the proposed location and the Project's contribution to depleting resources, as well as expressing support for the Applicant.



3. Actions Taken Since Exhibition

3.1 Consultation

The Applicant has consulted with each of the NSW and ACT Government agencies that have provided comments on the Project. The consultation was intended to ensure that comments and requests for further information were clearly understood and may be addressed promptly. The relevant officers are thanked for taking the time required for this consultation.

The Applicant has fielded phone calls and queries from organisations and individuals in the community. This has included site tours for some local residents. A community update will be presented in August 2026 to present the outcomes of the review of submissions. A recent community newsletter foreshadowed this event and discussed the recent sighting of a Koala at Theodore in the ACT.

3.2 Amendments to the Project

There have been two minor amendments to the Project as a result of the supplementary assessments completed. These include the following.

- The size of sediment dams to be constructed within the Processing and Stockpiling Area has been amended to provide a greater capacity for the Northern Dam and Processing Area Dam. This change was prompted by the EPA request that the Project water management infrastructure have the capacity to safely contain runoff from disturbed catchments from at least a 1 in 10 year (10% Annual Exceedance Probability) storm event. For the Project Site location this event represents 95.5mm of rain over a 24-hour period. Importantly, changes to the dam sizing does not change the physical disturbance or vegetation clearing required for the Project.
- The Applicant has committed to sealing the first 120m section of the Secondary Access Road from the intersection with Mates Drive. This would reduce the noise impact of regular maintenance of the road when operating (specifically the expected monthly operation of a grader).

The updated sediment dam sizing has been incorporated into figures presenting key components of the Project as follows.

- Principal Project Components (including the sealing of the Secondary Access Road) - **Figure 3.1.**
- Project Site Layout - **Figure 3.2.**
- The schedule of site establishment and construction activities – **Figure 3.3**
- The general arrangement of water management infrastructure – **Figure 3.4.**
- The indicative final landform – **Figure 3.5.**
- Progressive rehabilitation for the Project – **Figure 3.6.**
- The progressive development of the extraction area (**Figure 3.7**) and processing and stockpiling area (**Figure 3.8**).

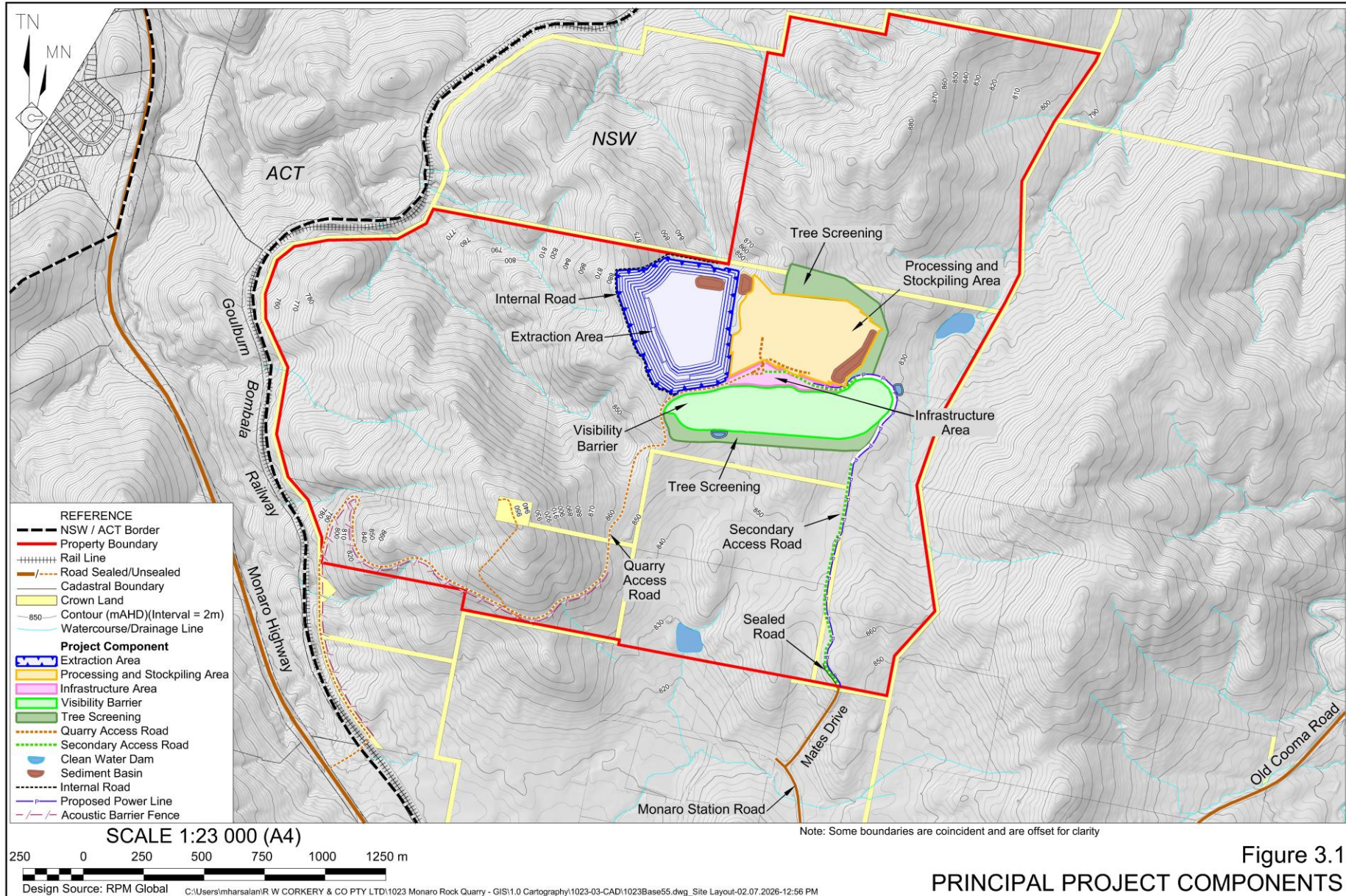
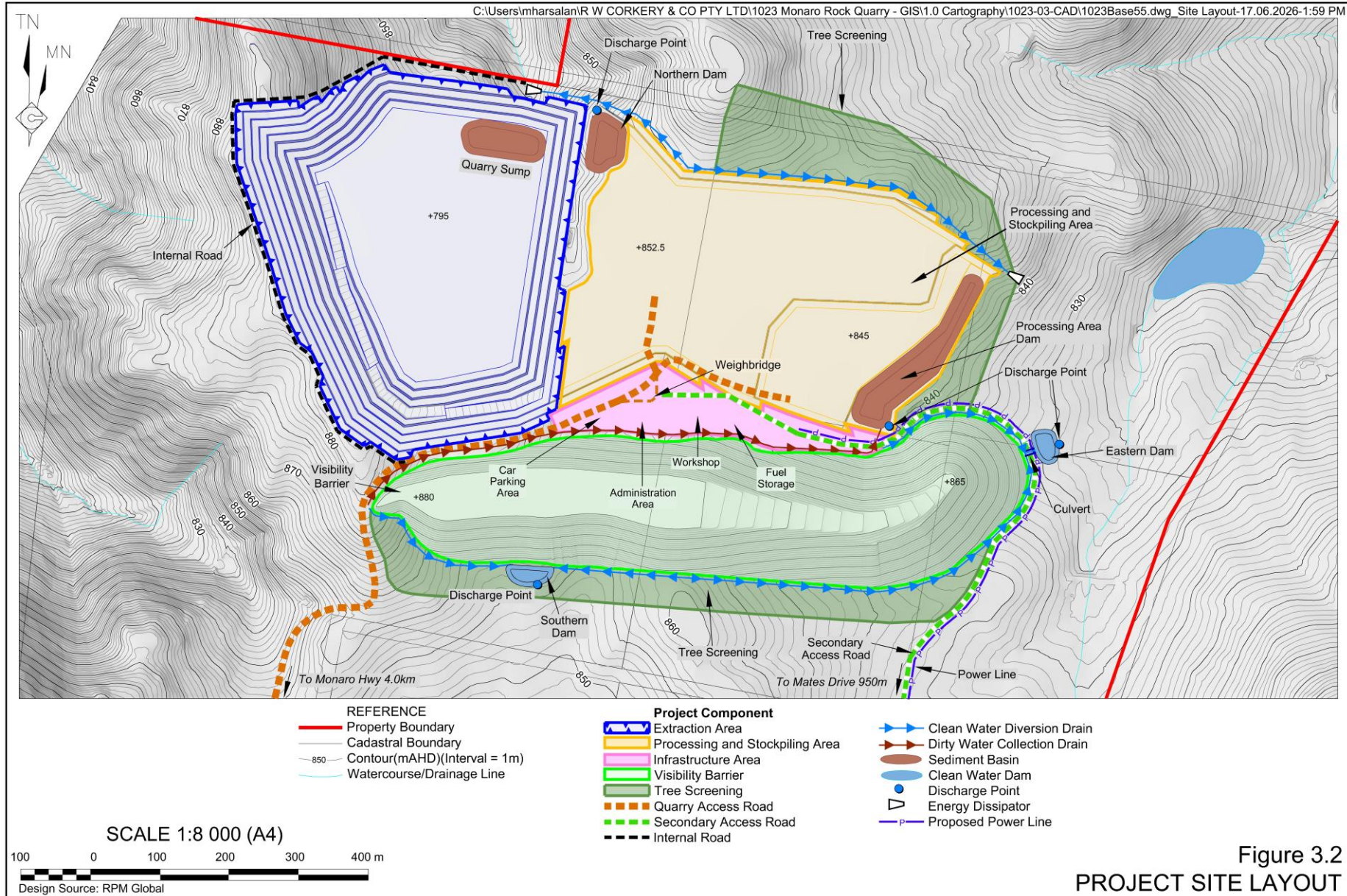
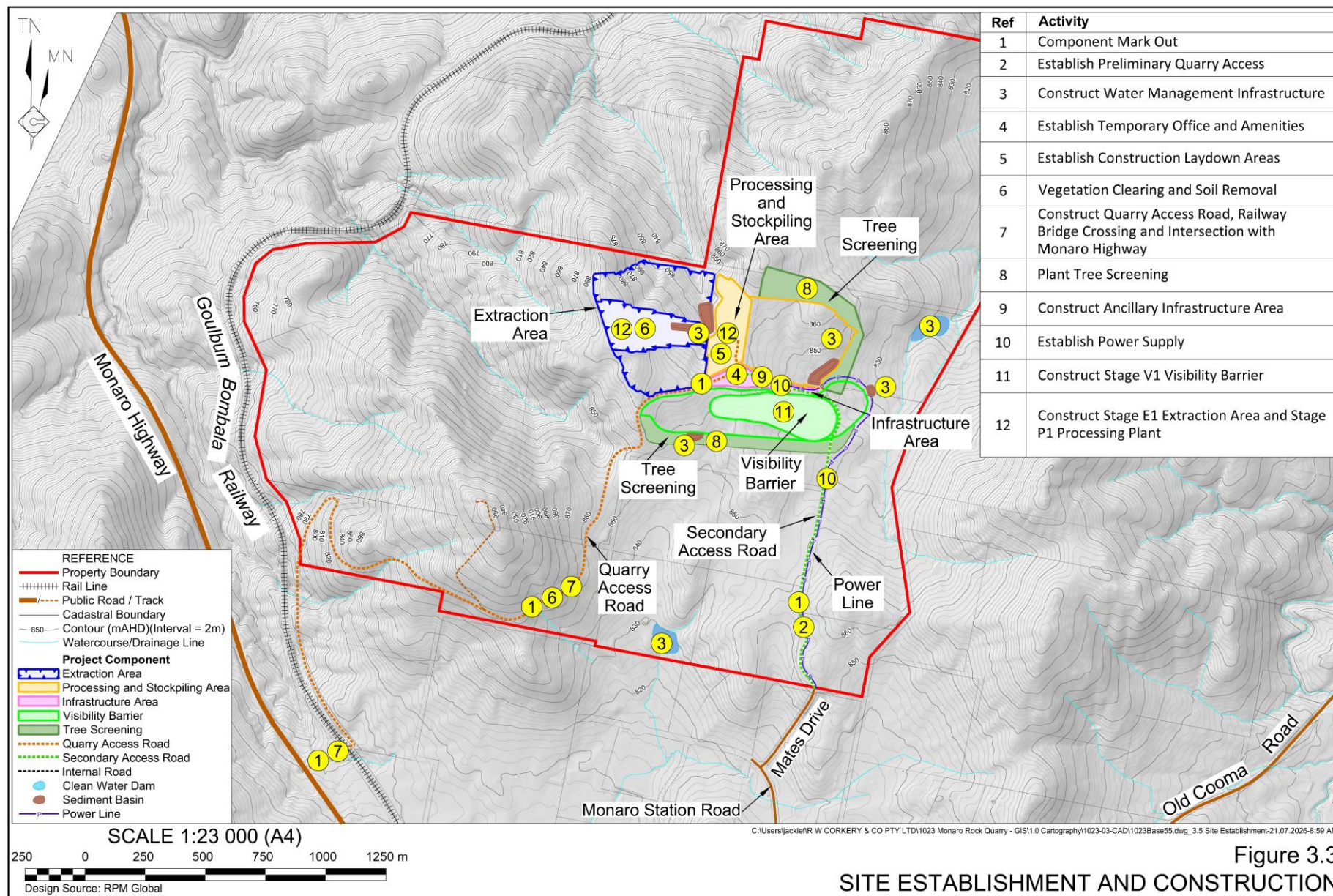
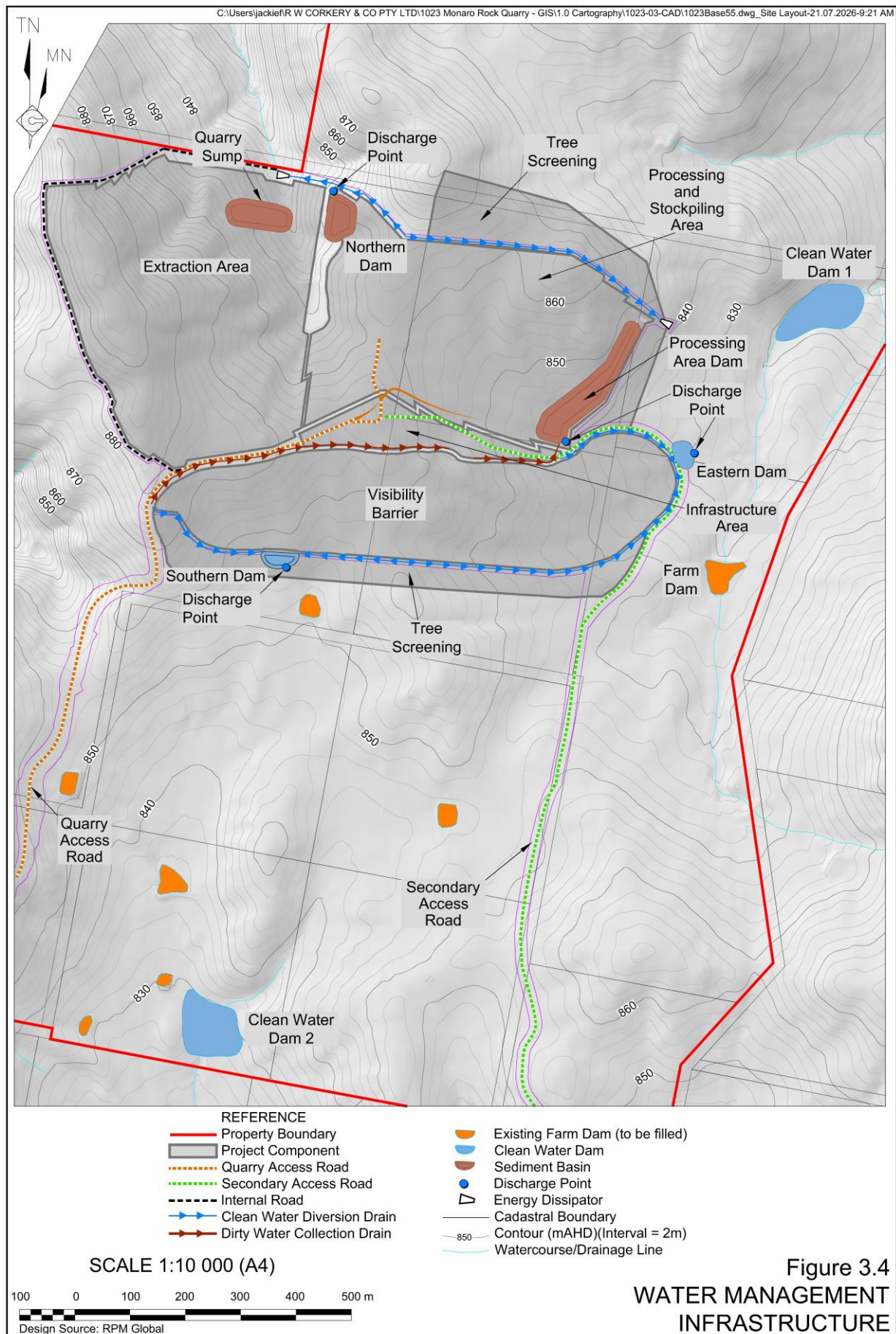
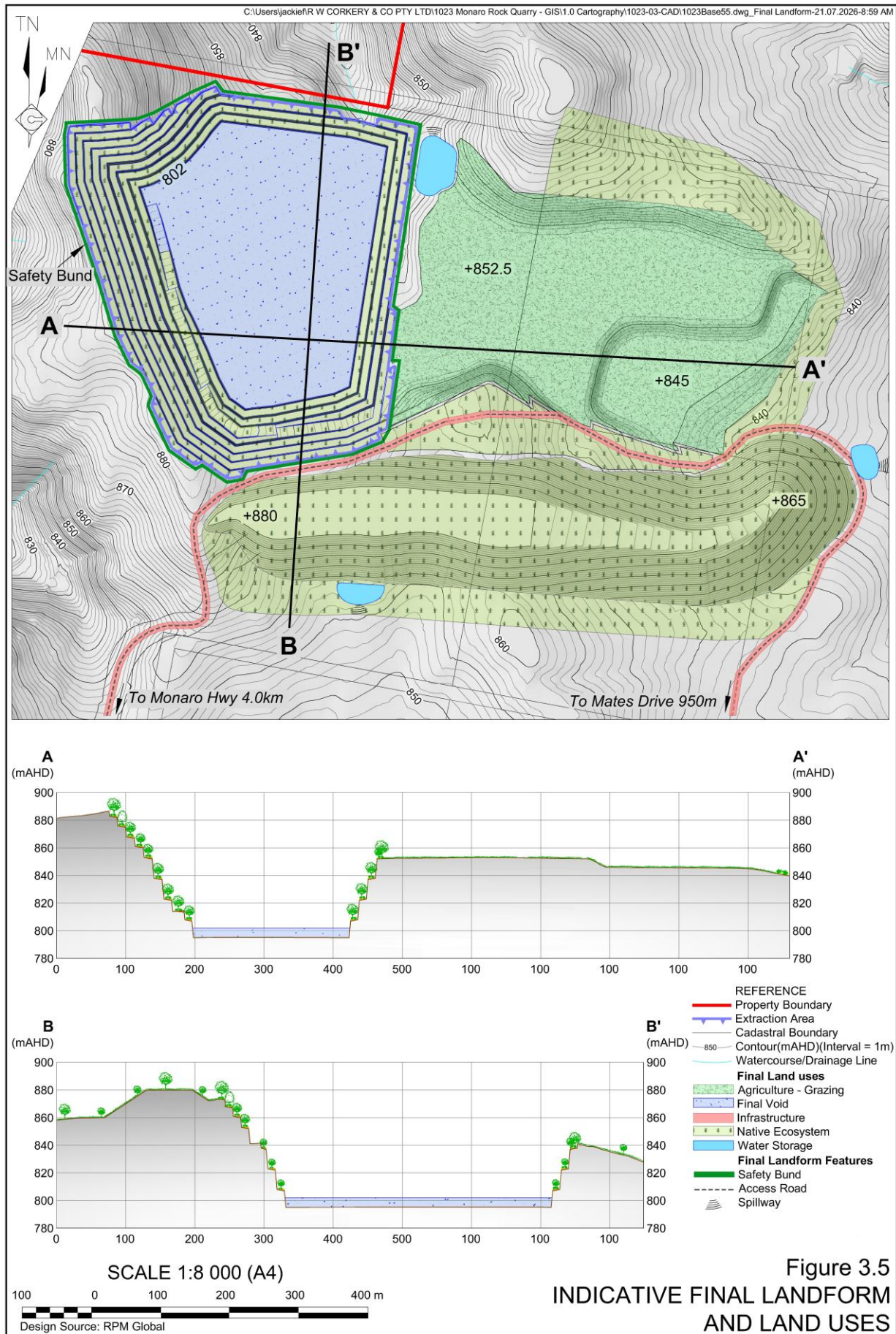


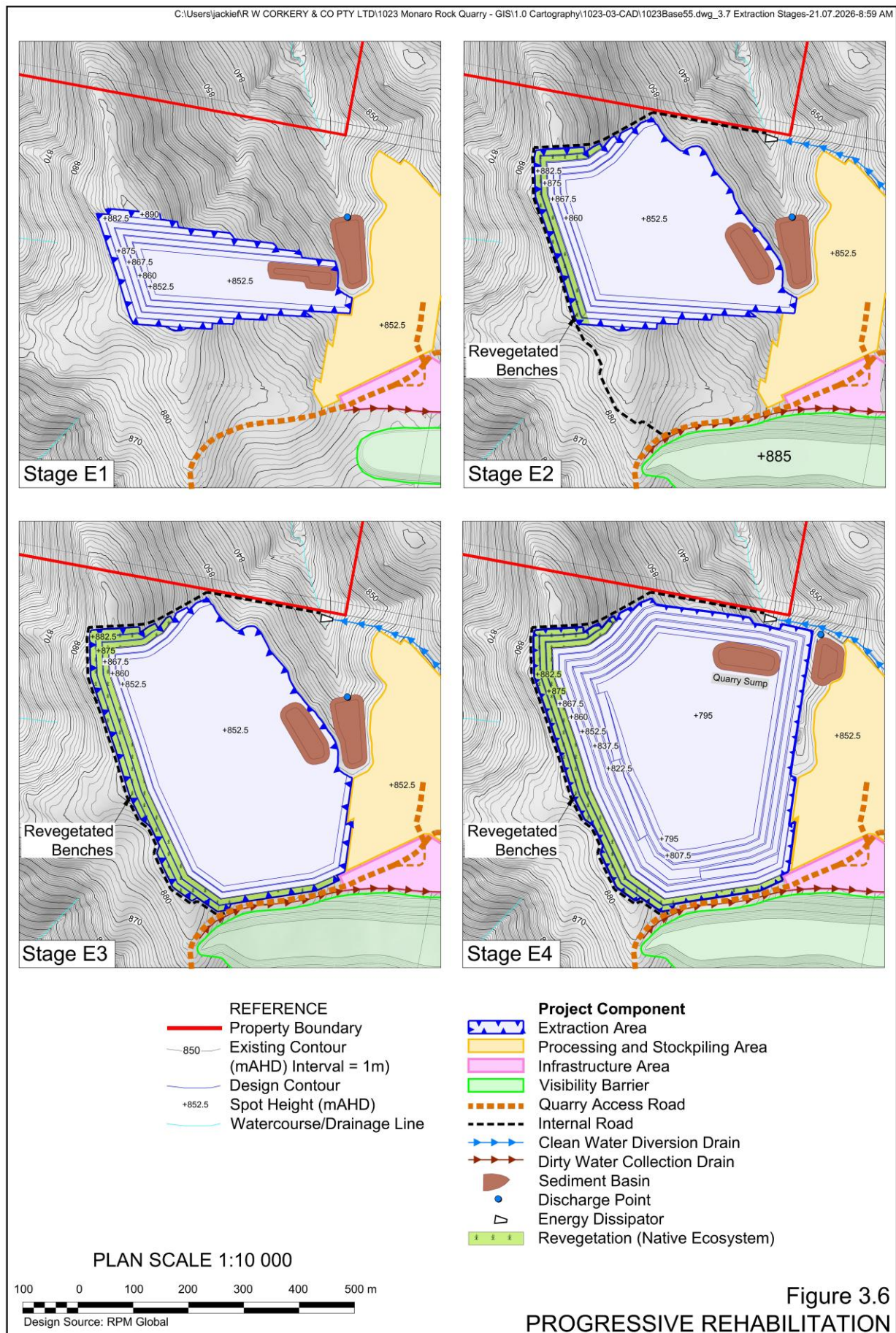
Figure 3.1
PRINCIPAL PROJECT COMPONENTS











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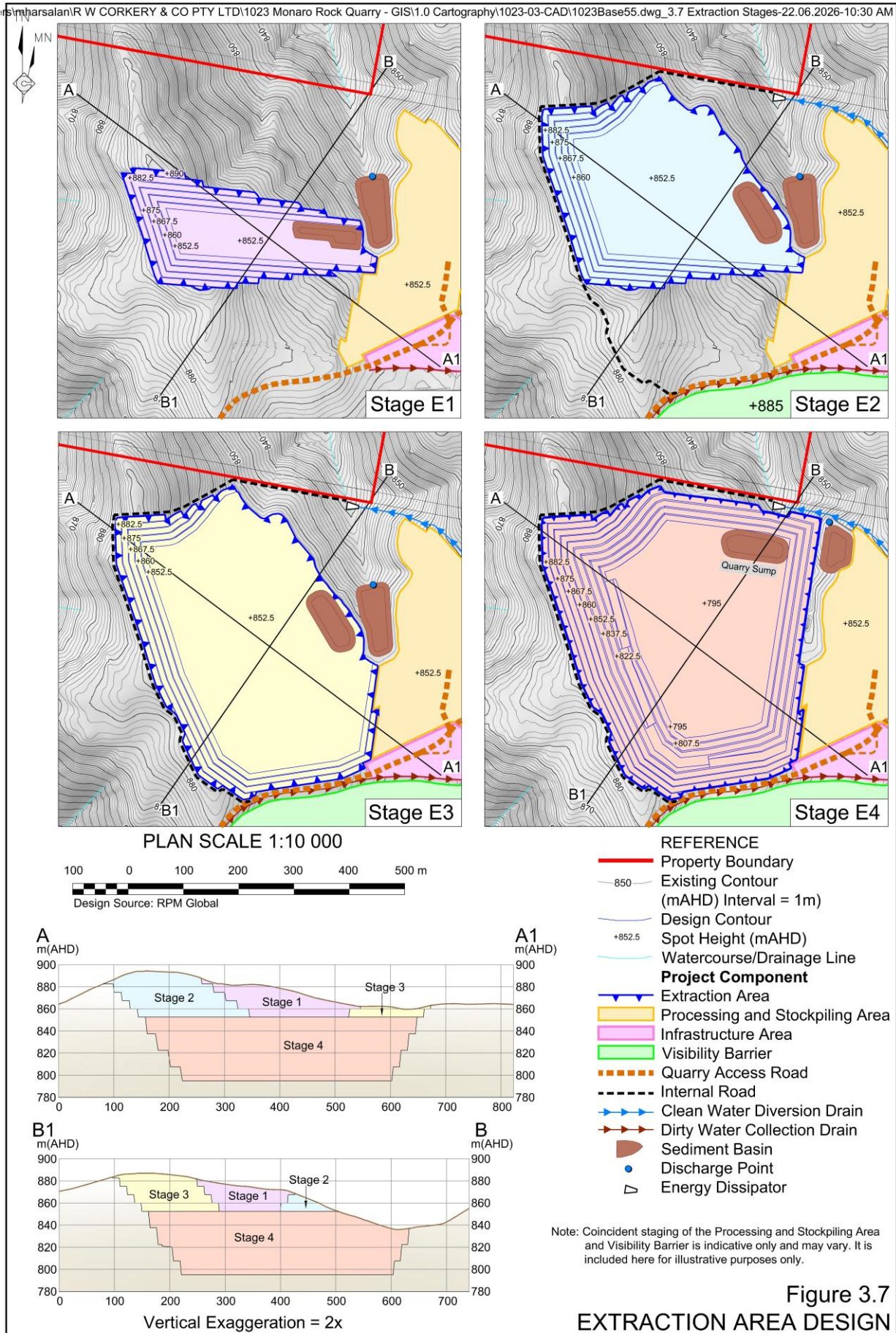
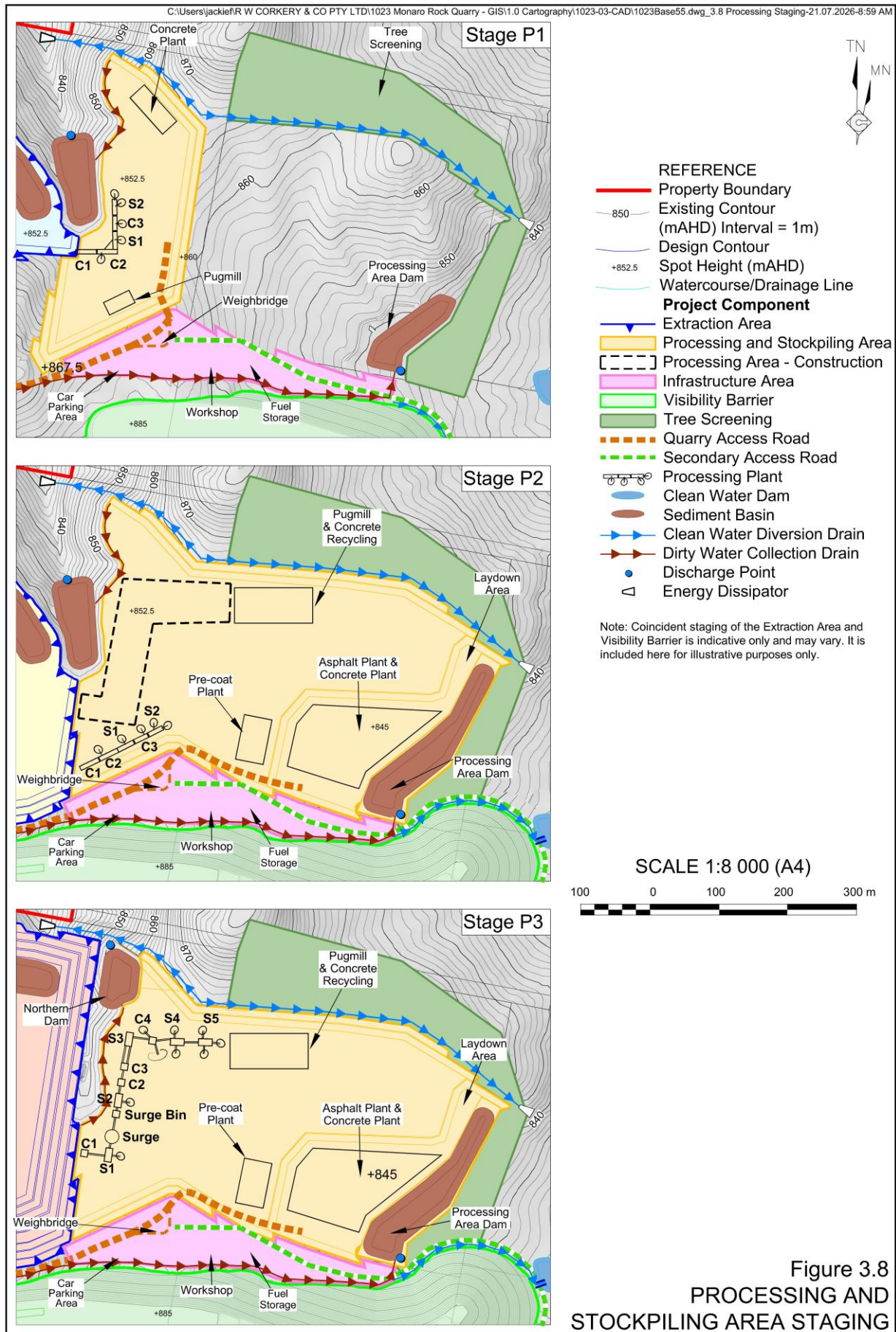


Figure 3.7
EXTRACTION AREA DESIGN



3.3 Supplementary Assessment

3.3.1 Air Quality

An updated Air Quality Impact Assessment (AQIA) (**Appendix 2**) has been prepared by Northstar Air Quality Pty Ltd (Northstar) to incorporate refined assessment to address comments by the NSW EPA and matters raised in submissions provide by Council and the community. The updated assessment has incorporated the following.

- Additional information has been provided in the AQIA to reflect the calculations and assumptions relied upon to support a 90% control efficiency for dust suppression on roads. This includes further information on the use of chemical dust suppressants where water availability is a concern.

The Applicant (and Northstar) remain comfortable that this level of control would be achieved. This notwithstanding, reactive management applied through a trigger action response plan (TARP) and supported by continuous particulate matter monitoring would inform air quality management for the Project.

- The discrepancy between the Tuggeranong (Isabella Plains) Automatic Weather Station (AWS) and CALMET data for prevalence of calm conditions has been reviewed. The Tuggeranong (Isabella Plains) AWS data was included in the TAPM and CALMET modelling to understand the implications of a potentially higher prevalence of calm conditions on dust dispersion modelling outcomes. The outcome resulted in the modelled prediction of calm conditions changing from previously modelled 0.0% to 3.1% in the TAPM modelling and 5.3% in the CALMET modelling.

Analysis of updated meteorological monitoring indicated that calm conditions reduced between the Tuggeranong (Isabella Plains) AWS and the Project Site, indicating the possible influence of topography on the prevalence of calm conditions. That is, conditions are less likely to be calm in the vicinity of the Project. The assessment outcomes have been comprehensively updated to reflect a higher proportion of calm conditions. This has changed the distribution of impacts with a marginal increase in air quality emissions for maximum predicted impacts (for example the maximum predicted 24-hour average PM₁₀ concentration at Residence R2 has increased from 11.2µg/m³ to 11.7µg/m³) but reduced impacts elsewhere. It is important to remember that this outcome is cumulative in that it includes the background conditions plus outcomes from the Project.

The updated modelling outcomes are presented in Section 6 of the updated AQIA and a sensitivity analysis of the results presented in Appendix E of the AQIA (Northstar, 2026). It should be noted that the changes in impact are marginal and do not materially influence the conclusions of the AQIA. The predicted exceedance of the 24-hour PM_{2.5} criterion under one outcome (day) of the Level 2 Assessment of 24-hour average PM_{2.5} concentrations at Residence R2 that was caused by the Project (incremental Project outcome of 1.1µg/m³ and existing background of 24.1µg/m³) is no longer predicted to occur.

- The AQIA was updated to assess emissions associated with the use of a diesel generator for asphalt production and to assess potential emissions of oxides of nitrogen (NO_x) and Volatile Organic Compounds (VOCs) associated with asphalt production. Additional activities were included in the assessment of odour, nitrogen dioxide (NO₂) and other emissions to allow for asphalt storage before transport (load-out) and the presence of storage tanks.
- The updated modelling predicts marginally higher levels of odour than those presented in the original assessment, though outcomes remain well below the adopted criteria (worst-case outcomes of 1.3 OU considered against a criteria of 2.0 OU that was based on population density). In addition, predicted worst case emissions (99.9th percentile incremental 1-hour concentrations) of NO₂ and VOCs would be significantly below the relevant criteria provided in the *Protection of the Environment Operations (Clean Air) Regulation 2022*.

In summary, the updated AQIA continues to predict that the Project may be operated to achieve the following.

- Compliance with annual average particulate matter and deposited dust criteria for Total Suspended Particulates (TSP), PM₁₀, PM_{2.5} and dust deposition established in the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (EPA, 2022).
- Emissions of respirable crystalline silica (RCS) would remain low (worst-case outcome of 0.24µg/m³ compared to an adopted criteria level of 3.0µg/m³ measured as the incremental annual average PM₁₀ concentration). This is slightly lower than originally predicted and would not change the outcomes of the human health risk assessment that concluded that the health risks to residents in existing properties adjacent to the Quarry are low and acceptable.
- Compliance with the adopted criterion of 2.0 OU for predicted odour assessed in accordance with the *Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW* (DECC, 2006).
- Compliance with the requirements of the *Protection of the Environment Operations (Clean Air) Regulation 2022* for predicted emissions of NO₂ taken to represent all NO_x resulting from the production of asphalt including the use of a diesel generator. Predicted worst-case emissions from the Project were substantially lower than assumed background levels (measured at the Monash Air Quality Monitoring Station).
- Compliance with the requirements of the *Protection of the Environment Operations (Clean Air) Regulation 2022* for predicted worst-case emissions of VOCs with predicted outcomes significantly below the relevant criteria at all receptors.

The outcomes of the updated AQIA continue to reflect the siting of the Project at a distance of approximately 1.5km from the closest private residence and with topographic features including hills and ridgelines mitigating the effects of the Project. The proposed Air Quality Management System for the Project would ensure that air quality risks are managed and monitored, and a system is in place to direct proactive management measures and to guide reactive management of unexpected outcomes.

3.3.2 Noise

The Noise and Vibration Impact Assessment (NVIA) (**Appendix 3**) completed by Octave Acoustics (Octave, 2026) was updated to address comments provided by the NSW EPA. The updated assessment has incorporated the following.

- The distinct periods for activities that would occur during the site establishment and construction period have been clarified. Initial construction activities, including the Secondary Access Road are likely to occur during the first month, with construction of the Quarry Access Road to occur from Months 2 to 4. During this time the Project Site operating areas would be established with some material extraction likely to occur from Month 5. Operational noise criteria would apply once extraction of materials is commenced. No material would be despatched from the Project Site for sale until the Quarry Access Road has been constructed, including the intersection with the Monaro Highway. The construction noise assessment was updated to reflect these distinct periods. Construction noise levels would remain below the Highly Noise Affected Level at all nearby sensitive receivers. However, total noise levels from construction in Month 1 were predicted to exceed the noise affected level at residences within:
 - NCA 5 (Noise Catchment Area) at minimum and average distances; and
 - NCA 6 at the minimum distance.

Total noise levels from construction for Month 2 to Month 4 were found to exceed the noise affected level at residences within:

- NCA 4 and NCA 5 at minimum and average distances; and
- NCA 6 at the minimum distance.

Construction noise management measures have been refined to demonstrate how potential impacts during construction would be managed.

- A more detailed assessment of low frequency noise risks was included in assessment. The assessment continues to conclude that low frequency noise is not likely to influence noise-related impacts at private residences and a correction to noise levels to account for low frequency noise is not required. This notwithstanding, Octave (2026) recommend that this be incorporated in noise monitoring upon commencement of the Project to validate the conclusions.
- Octave (2026) reviewed the expected frequency and use of a grader to maintain the Secondary Access Road. The Applicant has elected to seal the first 120m of the Secondary Access Road from the intersection with Mates Drive and this has been incorporated into the assessment outcomes.
- Additional assessment of road noise generated by vehicle use of Mates Drive and Monaro Station Road during construction and operations was undertaken. Only light vehicles would use the Secondary Access Road once operations commence. The results indicate that noise generation would comfortably comply with road noise criteria established in the *NSW Road Noise Policy* with worst-case outcomes

($L_{eq1hour}$) for the property closest to the road (R7) predicted to be 42dB(A) during construction and 41dB(A) which may be compared to the criteria of 55dB(A) ($L_{eq1hour}$).

The outcomes of the NVIA (Octave, 2026) continue to predict that noise levels and vibration impacts generated as a result of the operation of the Quarry would comply with the relevant assessment criteria at all private residences (within NSW and the ACT). Noise impacts from short term construction activities may exceed noise affected levels but would be mitigated by employing appropriate construction noise management practices. The Applicant has confirmed that noise from construction of the access roads would be the source of construction noise risks, noting that these activities would be most likely to occur over the first four months of the site establishment and construction stage.

3.3.3 Surface Water

3.3.3.1 Updated Surface Water Management Strategy

The Surface Water Management Report (SWMR) (**Appendix 4**) completed by Strategic Environmental and Engineering Consulting (SEEC, 2026) has been revised in response to comments received from the NSW EPA during exhibition of the Project. The revised report updates the conceptual surface water management strategy, erosion and sediment control framework, water balance modelling and surface water monitoring program to address matters raised by the EPA whilst maximising on-site water reuse and minimising uncontrolled discharges to receiving waters. The revised report supersedes the version exhibited with the EIS and forms the basis of the updates described in this Submissions Report.

DPE Water also requested that any works within waterfront land be undertaken in accordance with the Guidelines for Controlled Activities on Waterfront Land. The Applicant agrees with this recommendation. Should works within waterfront land be required, they would be undertaken in accordance with the applicable controlled activity guidelines, with any necessary approvals and supporting design documentation prepared during detailed design as part of the post-approval process.

3.3.3.2 Sediment Basin Design and Storage Capacity

The revised SWMR updates the operational surface water management system through refinements to sediment basin design and water storage infrastructure. The operational sediment basins have been redesigned to maintain capacity for a 1 in 10-year, 24 hour rainfall depth of 96.5mm, replacing the previous basis of a 5-day, 95th percentile rainfall depth (33mm) as presented in the EIS. The revised design incorporates an increase in the storage capacity of the Northern Dam and Processing Area Dam and allowance for triggered pumping of other dams to transfer water internally. The refinements increase storm storage capacity and reduce the risk of uncontrolled discharge from the Project. The larger storage capacity also improves the overall water reliability for the Project as more water is available in storage for on-site usage. The basins are designed to capture runoff from disturbed catchments and store it within the Project Site. The Applicant would need to ensure the storm storage capacity is returned within five days of any rainfall event, however, where capacity is available, the water would remain in dams which would allow the sediment to settle out of suspension.

As the Eastern and Southern Dams are constrained by the approved clearing extents they have not been expanded. During rainfall events, runoff from the Eastern and Southern Dams would be transferred to the Processing Area Dam to achieve the required capture capacity. The additional storage volume required to satisfy the revised design criteria has been incorporated into the Processing Area Dam. The Extraction Pit Sump and Northern Dam have also been redesigned with increased storage capacity to improve operational water availability. The revised storage configuration has been developed within the existing Project disturbance footprint and does not require additional clearing or expansion of disturbance areas.

3.3.3.3 Clean and Dirty Water Separation

The revised SWMR further refines the conceptual water management strategy to enhance separation between clean and dirty water throughout all stages of quarry development. Clean water diversion drains upstream of the Quarry have been configured to intercept runoff from externally draining catchments and divert flows around the Project Site, preventing the ingress of clean runoff into operational areas. Additional diversion drains located adjacent to the southern visibility barrier direct clean runoff to the Eastern and Southern Dams, where it will be retained for operational reuse, including dust suppression and process water supply.

Dirty water would be managed with a series of low flow earth banks which would be progressively constructed downslope of the extraction area as it is developed, and Type F/D sediment basins adopted across the site. The revised storage configuration retains runoff within the site's water management system prior to treatment or reuse, with the adopted storage volumes exceeding the minimum erosion and sediment control requirements to reduce spill frequency and minimise the volume of water requiring discharge from the site.

3.3.3.4 Updated Water Balance Assessment

The Project water balance has been reassessed to reflect the revised sediment basin storage capacities, water storage infrastructure and operational water management system. The adopted operational water management strategy incorporates the revised sediment basin storage configuration together with increased pit sump storage and internal transfer of captured runoff prior to controlled discharge, where required. The revised water balance assesses the performance of this strategy throughout each stage of quarry development, considering annual controlled releases, uncontrolled overflows, operational water shortages and overall system reliability. Model results are presented for the average of all simulated years, together with representative dry (10th percentile), median (50th percentile) and wet (90th percentile) rainfall years.

Under the adopted operational water management strategy, the revised water balance predicts the water demand requirements for the Project are met >98% of the time (up from 95%) based on total volume and on >98% of modelled days (up from 93%) with water supply reliability predicted to occur between 85% and 99% of years modelled (up from 64% to 83%).

During very dry years, supplementary water from an external source may be required, with a maximum shortfall of 3.1ML predicted during Year 4 and an average annual supplementary water requirement of approximately 0.6ML per annum. In these cases, the following measures would be implemented.

- Reduce water usage through the use of chemical dust suppressants.
- Seek an external water source and tanker water to the quarry.

- Temporarily reduce the scale of the operation and limit concrete production, to ensure the dust management objectives are being achieved

Importantly, this approach would ensure water is available for dust suppression as a priority.

3.3.3.5 Surface Water Quality and Controlled Discharge

The highest priority for the management of detained water would be to avoid the occurrence of uncontrolled discharge. The revised SWMR reinforces the Project's water management hierarchy, whereby captured surface water is preferentially retained within the Project Site's water management system and reused for operational purposes, including dust suppression or for irrigation onto tree-screening vegetation or rehabilitation areas. Review of operational constraints has identified that automatic sprinkler systems are currently not considered feasible at the Project Site.

Controlled discharge would only occur where:

- heavy rainfall has made the site too wet for beneficial onsite re-use such as dust suppression; and/or
- the volume of detained surface water exceeds what can be feasibly re-used onsite prior to the next rainfall event; and/or
- heavy rainfall has made land application onto nearby vegetated or revegetation areas impossible; and/or
- there are no suitable onsite re-use options available in reasonable proximity to the detained body of surface water.

Water quality monitoring would have several components and would likely evolve over time as existing site-specific information becomes available. As a greenfield site, it is not yet possible to measure water quality meaningfully. Therefore the following components are expected.

- An initial monthly program of monitoring key water management infrastructure to establish site-specific water quality objectives and triggers.
- Monitoring of the quality and quantity of any surface water leaving the Project Site and detect any potential impacts of Quarry operations on downstream watercourses.
- Visual monitoring on a regular basis and within 24 hours of significant rainfall events (>15mm in 24 hours).

Site-specific trigger values would be developed following a minimum of two years baseline monitoring. Until these values are established, the samples would be compared against the ANZG (2018) water quality trigger values or New South Wales Water Quality Objectives. Visual observations would also be undertaken at diversions to identify they are operating as expected.

Water quality monitoring would include at a minimum the following parameters:

- pH
- Electrical Conductivity

- Total Suspended Solids
- Turbidity
- Oil and grease
- Visible pollutants (e.g., sediment, discolouration, odours)

The monitoring program would be established in a Water Management Plan to be prepared prior to the commencement of the Project. Specifically, the frequency, location and monitoring parameters would be selected following consultation with the EPA and would include all monitoring requirements specified in the site Environment Protection Licence (EPL) and Water Management Plan. It is accepted that the water monitoring program would include initial monitoring and likely evolve over time, however all changes must be consistent with the site EPL.

Where controlled discharge is required, detained water would be treated and verified to comply with the relevant EPL discharge criteria prior to release. The use of flocculants may be included in the water management strategy, however only once the selection of flocculant has been notified to the EPA and any requested changes to water quality monitoring implemented. Appendix B of the updated SWMR presents an example of material safety data sheets that accompany the supply of flocculants and contain the information needed to justify use. Controlled discharges would be managed to restore the required operational storage capacity within sediment basins within five days of rainfall events. Where treatment is required, appropriately selected flocculants or other treatment measures would be applied in accordance with site Water Management Plan prior to verification of discharge water quality.

Collectively, the revisions to the SWMR strengthen the Project's operational surface water management framework by increasing operational storage capacity, refining runoff management and supporting improved management of water quality and controlled discharges throughout the life of the Project.

3.3.4 Aboriginal Cultural Heritage

3.3.4.1 Introduction

Subsurface investigations were conducted by Past Traces Pty Ltd to assess the archaeological significance of identified areas of Potential Archaeological Deposit (PAD) within the Project Site (Past Traces, 2026). The investigation forms part of the updated Aboriginal Cultural Heritage and Archaeological Report (ACHAR) (**Appendix 5**) undertaken in response to feedback from Heritage NSW regarding the need to further assess subsurface archaeological deposits associated with recorded surface artefact sites and PAD areas. The investigations were completed in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b), with participation by Registered Aboriginal Parties (RAPs).

Subsurface testing was undertaken in February and March 2026 at eight identified PAD areas, including six PADs associated with recorded surface artefact sites. The purpose of the testing program was to determine whether intact subsurface cultural deposits were present, assess the nature, extent and significance of any deposits identified and to develop appropriate mitigation measures appropriate to their cultural value.

3.3.4.2 Surveys Methodology and Outcomes

The subsurface testing program targeted eight (8) PAD areas; MQ2PAD, MQ13PAD, MQ16PAD, MQ19PAD, MQ20PAD, MQ26PAD, MQ30PAD and MQ32PAD. Test excavation methodology was developed in consultation with RAPs in accordance with NSW Heritage guidelines and involved the excavation of hand-dug test pits within areas identified as holding archaeological potential during the field survey. Excavations were dug by hand unless stratigraphic changes were identified. Excavated material was sieved to maximise artefact recovery. Test pit locations are shown in Figure 12 of the ACHAR as the locations of PAD within areas of direct disturbance and in figures presented throughout Section 6 of the ACHAR.

Representatives of the Aboriginal community (Djirringanj Elders Federation, Ngarigo Elders and Ngambri LALC) were present during the survey fieldwork RAP Jason Davison and representatives of the Ngambri LALC assisted with the subsurface testing program. RAPs also provided input regarding cultural significance and management recommendations.

Testing identified low-density, dispersed cultural deposits are present at all eight PAD locations. Cultural material recovered during the investigations primarily consisted of isolated stone artefacts and small lithic scatters characteristic of the wider Royalla region.

3.3.4.3 Significance Assessment

All identified artefacts were assessed against the NSW heritage assessment criteria as set out in NSW Heritage guideline *Assessing Heritage Significance* 2025 (Dept Planning and Environment 2025). Lithic scatter and isolated find sites are common in nature and contribute mainly to regional understanding of local land use, technology, and material sourcing. The RAPs have stated that all of the sites hold significance and that impacts should be minimised and, if unavoidable, surface artefacts collected and curated or returned to country.

The scarred tree (MQ8) and ring tree sites (MQ9) have been assessed as rare and highly significant site types that must be protected from harm. This view has been incorporated into the revised design with the exclusion of both of these locations from the development area by the Applicant in line with the wishes of the RAPs. No additional sites of significance were identified during the subsurface investigations. Therefore the conclusions to the significance assessment remain unchanged.

3.3.4.4 Management and Mitigation Measures

Mitigation measures have been developed for Aboriginal heritage sites and subsurface deposits identified within the Project Area to minimise impacts and retain archaeological and cultural value where possible. Measures include salvage collection of 11 surface sites within the development area and six surface sites with associated areas of PAD. Salvaged artefacts would be analysed and returned to Country in accordance with a Return to Country Protocol developed in consultation with RAPs. Methods to be employed during salvage are described in Section 9.1 of the ACHAR (Past Traces, 2026).

Barrier fencing would be installed around retained sites (MQ8 & MQ9) prior to any construction works. No harm areas will be marked on project mapping and all personnel would be informed of their heritage responsibilities as a component of site inductions.

All mitigation measures would be implemented under the guidance of a suitably qualified heritage consultant, with RAPs provided the opportunity to participate in heritage management activities. Ongoing management is to be guided by an Aboriginal Cultural Heritage Management Plan (ACHMP) and the Unexpected Finds Protocol contained in Appendix 6 of Past Traces (2026).

3.3.4.5 Conclusion

Subsurface investigations undertaken within identified PAD areas confirmed the presence of low-density, dispersed cultural deposits at eight locations within the Project Site. The identified deposits are consistent with the broader archaeological character of the Royalla region and primarily comprise isolated finds and scatters of lithic material.

The investigations did not identify any subsurface archaeological deposits of cultural or scientific significance that could not be reasonably managed by the proposed mitigation measures.

3.3.5 Traffic and Transportation

A Road Transport Assessment was undertaken for the EIS by The Transport Planning Partnership (TTPP) to evaluate the Project's effects on the surrounding road network, including construction and operational phases. The assessment has been updated (TTPP, 2026) (**Appendix 6**) in consideration of the time that had elapsed since the surveys of background traffic conditions were conducted (Sections 2.12 and 2.13 of TTPP (2026)). This includes reporting of the results of additional traffic surveys conducted in November 2025 and review of background traffic growth on the Monaro Highway.

The updated assessment details the traffic surveys undertaken in November 2025 at key locations near the Project, including Monaro Highway, Old Cooma Road, and Monaro Station Road. The two week survey (avoiding public holidays), used automatic tube counters to validate earlier forecasts based on 2021 data. Daily two-way vehicle counts were recorded, revealing consistent weekday traffic peaks in the morning and evening on Monaro Highway, with mid-morning and afternoon peaks on Saturdays. It is noted that Old Cooma Road now shows more pronounced morning and evening peaks, likely due to the new residential development at Googong since 2021. Peak hourly volumes reached around 800 vehicles per hour on the Monaro Highway during weekdays. The data also highlight directional trends, with morning northbound and afternoon southbound traffic driving weekday peaks, while Saturday demand is more evenly distributed. This updated information will inform assessments of future traffic conditions, particularly during the Project's construction phase.

Table 3.1 presents a comparison of forecast traffic levels presented with the EIS and surveyed traffic levels from November 2025, focusing on peak hourly volumes. Forecasts used in the EIS assessment were based on an assumed annual growth rate of 2.9%, with actual 2025 survey data then compared against these projections. Weekday peak traffic volumes in November 2025 closely matched forecasts (growth of 2.85% compared to forecast of 2.9%), indicating the adopted growth rate was accurate. However, Saturday peak volumes were lower than predicted, suggesting slower growth on weekends. Further comparisons using observed growth rates show that weekday forecasts remain valid, while Saturday forecasts could be reduced to better reflect real trends. Overall, maintaining higher baseline forecasts for Saturdays ensures a conservative

assessment of future project impacts. It is noted that the assessment considers peak traffic in the morning and evening, assuming that the peak Project traffic occurs at the same time. It is further assumed that traffic outcomes during other operating hours would experience a lower level impact and therefore the peak hour is considered a worst-case outcome.

Table 3.1
Comparison between Forecast and Surveyed Two-Way traffic on Monaro Highway

	Weekday (vehicles per hour)		Saturday (vehicles per hour)	
	AM Peak	PM Peak	AM Peak	PM Peak
Surveyed May-June 2021	692	694	697	703
Forecast November 2025	787	790	793	800
Surveyed November 2025	785	775	737	716
Surveyed % of Forecast	99.8%	98.2%	93.0%	89.6%
Average Annual Growth Rate	2.85%	2.48%	1.25%	0.41%
Source: TTPP (2026) – after Table 2.15				

As a result of this analysis, the assessment conclusions made by TTPP (2026) remain unchanged, that is, the Project's transportation activities would have minimal impact on local traffic flows, with Project-related traffic accommodated within existing road capacities. Peak hour delays are expected to be negligible, and operational traffic would be infrequent. The Monaro Highway and Quarry Access Road intersection is designed to handle projected traffic volumes safely, supported by approved heavy vehicle routes and a Drivers Code of Conduct. While occasional congestion may require pre-planned transport coordination, the chosen access road location significantly reduces conflict risks for local communities, and the intersection configuration remains the preferred option.

Monitoring and compliance would be managed through a combination of regulatory oversight and operator commitments. Any exceedances of approved limits would constitute a non-compliance and be subject to regulation by DPHI. The Applicant would also implement a Drivers Code of Conduct and induction program to reinforce compliance and safe behaviour.

3.3.6 Biodiversity

The Biodiversity Development Assessment Report (BDAR) prepared by Capital Ecology, has been revised in response to comments received from CPHR during exhibition of the EIS (**Appendix 7**). Key revisions include additional targeted survey work, refinement of the indirect impact assessment, further assessment of Serious and Irreversible Impacts (SAII), updates to the biodiversity offset assessment, and clarification of the staged retirement of biodiversity credits consistent with the proposed staged development of the Project.

- Targeted surveys for the Canberra Spider Orchid (*Caladenia actensis*) were undertaken following verbal advice from CPHR during a site visit. The surveys were conducted in September 2025 and did not locate the species. It has therefore been concluded that the species is not likely to be present.
- Targeted surveys for microbats and specifically targeting the Southern Myotis (*Myotis macropus*) were undertaken in accordance with the Biodiversity Assessment Method (BAM) and TBDC requirements. The survey confidently

identified eight microbat species and a further six species were identified as possibly occurring. The records included three bat species that are listed as vulnerable within the *NSW Biodiversity Conservation Act 2016* including the following.

- Eastern False Pipistrelle (*Falsistrellus tasmaniensis*)
- Large Bent-winged Bat (*Miniopterus orianae oceanensis*)
- Southern Myotis (*Myotis Macropus*) – possible identification

The species identified during survey have been incorporated into the assessment of potential impact. With regard the targeted survey for the Southern Myotis, Capital Ecology (2026) concluded that based on the targeted survey results, the absence of confirmed detections, the limited extent of potential habitat and the lack of key habitat features required by the species, the Southern Myotis is unlikely to occur within the property. Accordingly, no species credits were generated for Southern Myotis.

- The assessment of *Swainsona recta* has been updated to provide additional consideration of indirect impacts, refinement of species mapping consistent with TBDC requirements and an assessment of the potential for SAI. A species-specific management plan has also been prepared to support implementation of the proposed avoidance, mitigation and monitoring measures for the species.
- The assessment of *Pomaderris pallida* has also been expanded to provide additional consideration of the SAI principles and further discussion of avoidance, minimisation and mitigation measures.

Following preparation of the revised BDAR, a Koala (*Phascolarctos cinereus*) was recorded adjacent to the Monaro Highway and assumed to be approximately one to two kilometres from the property on which the Project would be developed. The sighting is acknowledged and has been incorporated into the updated BDAR. The Applicant is in the process of commissioning targeted Koala surveys in accordance with the BAM requirements. Therefore, the occurrence of the species within the subject land has not been determined. Targeted surveys in accordance with the *Koala (Phascolarctos cinereus) Biodiversity Assessment Method Survey Guide (2022)* are scheduled to be undertaken between August and December 2026, following which the BDAR will be updated to reflect the findings of those surveys.

Overall, the revised BDAR provides additional survey information, refines the assessment of biodiversity impacts and strengthens the proposed monitoring and management framework. The amendments do not materially alter the overall conclusions of the biodiversity assessment, with the Project continuing to be capable of complying with the requirements of the *Biodiversity Conservation Act 2016* through implementation of the proposed avoidance, mitigation and biodiversity offset measures.

4. Response To Matters Raised

4.1 Government Agency Submissions

4.1.1 Introduction

The following sub-sections present the submissions received from government agencies and authorities (in *italics*). A response to each issue raised is presented (in normal text).

4.1.2 Environment Protection Authority

4.1.2.1 Air Quality

Comment

Particulate matter emissions from haul roads account for a large portion (up to 64%) of the emission inventory presented in the AQIA. The AQIA outlines that emission from haul roads will be managed through the use of wet suppression and the use of chemical suppressants should sufficient water not be available in a particular year.

The Katestone (2011) study, which outlines measures for managing particulate matter emissions and literature values for control efficiencies, has been referenced in the AQIA. The dispersion modelling is based on an assumed control efficiency of 90% for the proposed water application. The AQIA outlines that calculations have been undertaken to determine the water requirements to achieve a control efficiency of 90%. However, the supporting calculations or a robust demonstration that 90% could be achieved has not been provided. Given the range of control efficiencies for watering in Katestone (2011), EPA considers the adoption of a 90% control efficiency for watering may not reflect a reasonable worst case scenario, and such a control efficiency may not be achievable at all times.

Response

The updated AQIA includes additional detail regarding the calculation of the 90% emission control efficiency. The control efficiency for watering and/or chemical suppressant use was calculated using the equation provided in Buonicore & Davis (1992). The equation takes into account local evaporation rates, traffic activity, and water application intensity and frequency. Results are presented in Table 6 of the updated AQIA and would vary with season due to changes in evaporation rates, for example more frequent application would be required during summer. At an application rate of 2L/m² the time between applications would vary between roughly every 45mins and every 3.5hrs over the year. This is readily achievable for modern quarrying operations. The outcomes would be implemented through management of the site so that the 90% control efficiency would be achieved.

The use of chemical suppressants would result in similar control efficiencies, and these can be used alone or with water application (reducing the amount of water required to achieve the same control efficiency). The use of this dual approach would be a best-practice approach to allow adaptive management while maintaining the 90% control efficiency.

Comment

Appendix B to the AQIA provides a comparison of the CALMET generated meteorological data with the meteorological data collected at the Tuggeranong AWS. Figure B3 provides wind roses of the two data sets. Figure B3 shows that for 2021 the Tuggeranong AWS recorded ~23% calm conditions. However, the CALMET meteorological data, which is used as an input into the dispersion modelling has a much lower percentage of calm conditions (1.5%). Poor dispersion conditions can occur during the calm conditions, which may result in the modelling not capturing the worst case meteorological conditions. The EPA recommends that the AQIA is revised to:

- Provide dispersion modelling predictions based on a meteorological data set that adequately captures an appropriate level of calm conditions; or*
- Include a sensitivity analysis, where meteorological data measured at the Tuggeranong AWS is used as an observational station in CALMET, and the predicted ground level concentrations for this sensitivity analysis are presented.*

Response

Dispersion modelling outcomes were updated to incorporate a higher proportion of calm conditions. As noted in Section 3.3.1, the Tuggeranong (Isabella Plains) AWS data was included in the TAPM and CALMET modelling which resulted in the modelled prediction of calm conditions changing from previously modelled 0.0% to 3.1% in the TAPM modelling and 5.3% in the CALMET modelling.

A sensitivity analysis of the outcomes resulting from use of updated modelling of calm conditions has been included as Appendix E of the AQIA. The analysis noted that a higher prevalence of calm conditions did influence dispersion outcomes with marginally higher maximum outcomes at Residence R2 (the maximum predicted 24-hour average PM₁₀ concentration has increased from 11.2µg/m³ to 11.7µg/m³) but also that outcomes for the Level 2 assessment of 24-hour average PM_{2.5} concentrations were reduced and the originally predicted exceedance at this location (incremental Project outcome of 1.1µg/m³ and existing background of 24.1µg/m³) is no longer predicted to occur.

Importantly, the outcomes of updated dispersion modelling continues to predict compliance with the relevant criteria for all assessed parameters under worst-case conditions.

Comment

The EPA support the proposed implementation of the real time air quality monitoring and the associated TARP, however the EPA requires additional information to demonstrate the effectiveness of the proposed reactive management measures. The EPA recommends that the AQIA is revised to demonstrate how the proposed reactive management measures can manage any predicted exceedances found through the sensitivity analysis undertaken above in item 1 and item 2.

Response

As noted above, updated dispersion modelling adopting updated meteorology reflects a greater incidence of calm wind conditions and the distribution of particulate matter is such that the exceedances predicted in the original AQIA are no longer anticipated to be experienced. The

TARP would therefore be used to provide additional assurance that the Project can be operated to ensure that no additional particulate matter exceedances would occur and would form a component of the Air Quality Management System.

Under the TARP, two real-time particulate monitors would be installed at the following locations.

- To the north west of the Project Site, as a proxy for non-Project related air quality concentrations in north/north westerly winds.
- Close to receptor R2 or R3 (where highest incremental impacts are predicted to occur) to allow comparison of measured concentrations to ambient air quality criteria, and to allow the calculation of Project contribution in north/north westerly winds.

In the event that an exceedance is identified, an investigation would be completed to determine the likely cause(s), and ensure that all corrective and preventative actions are completed and recorded. Trigger levels and processes for exceedances have been identified to allow for corrective and preventative action to be taken and recorded. All exceedances would be immediately notified to DPHI and the EPA and reported in publicly available annual reporting.

Comment

2.4.1 Figure 7 of the AQIA provides an indicative layout for the proposed asphalt plant. The figure shows that a diesel generator is proposed. However, the AQIA has not accounted for emissions from the diesel generator. In order to address this issue, the EPA recommends that the AQIA is revised to address the impacts accounting for emissions from the proposed diesel generator.

2.4.2 Section 3.3 of the AQIA references the standards of concentrations from the Protection of the Environment Operations (Clean Air) Regulation (the Regulation). However, only standards for total particulates are referenced. There are standards for other air pollutants that are required to be achieved. Section 3.5 of the Approved Methods for Modelling and Assessment of Air Pollutants requires that the emission inventory must be used to demonstrate compliance with the Regulation. The AQIA does not include a demonstration that proposed point sources would achieve compliance with the Regulation.

The EPA recommends that the AQIA is revised to assess the impacts accounting for emissions from the proposed diesel generator.

2.4.3 Section 2.11 outlines other air pollutants associated with the Asphalt Plant. The AQIA does not include a site-specific assessment of the impacts from these air pollutants but instead references an impact assessment for another asphalt plant in Tomago. EPA recommends that the AQIA be revised to include a site-specific assessment of impacts of NO_x and organic volatile emissions from the asphalt plant.

2.4.4 The AQIA does not describe fugitive emissions from loading of asphalt and from bitumen storage tanks in detail, and it is unclear if fugitive emissions have been accounted for in the modelling.

The EPA recommends that the AQIA is revised to account for fugitive emissions from the proposed asphalt plant and provide further information on the mitigation measures proposed to manage fugitive emissions.

Response

The AQIA has been updated to include an assessment of NO₂ taken to represent all oxides of nitrogen (NO_x) and VOCs associated with the production of asphalt (benzene, toluene, xylene and ethylbenzene) including the use of a diesel generator, the handling and storage of materials for load out, and use of storage tanks. The assessment of odour has also been updated to account for these activities. Data collected in monitoring at an asphalt plant at Tomago was used to provide representative information in the absence of monitoring at the Project.

The results of assessment predict compliance with the requirements of the *Protection of the Environment Operations (Clean Air) Regulation 2022* for predicted worst-case emissions of NO₂ and VOCs. The odour assessment resulted in marginally higher outcomes but remained within the adopted assessment criteria determined in accordance with the *Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW* (DECC, 2006).

It is standard practice for fugitive emissions from bitumen storage locations to be managed through the use of charcoal filters on vapour traps. Fugitive emissions from bitumen storage are considered to be negligible compared to stack emissions, however would be mitigated through standard controls.

4.1.2.2 Noise and Vibration

Comment

The construction noise assessment focuses on the widening of the secondary access road, stating that construction of the bund as well as the extraction and processing areas will have minimal effect on sensitive receivers. The NVIA should outline the potential noise impact from all construction noise, cumulatively with widening of the secondary access road and primary access road where these activities are undertaken at the same time as other construction works.

The EPA recommends that the NVIA is revised to include an indicative timeframe of construction activities, for example the timeframe for widening of the secondary access road and approximation of when in the construction timeframe where the 'visibility barrier' and access road barrier will have any appreciable effect on minimising noise levels from the processing and extraction areas.

Response

Site establishment and construction activities are anticipated to require approximately 6 months to be completed. Section 3.4 of the EIS presents the indicative schedule for activities with widening and additional construction for the Secondary Access Road to be completed early and separate to the Quarry Access Road construction given the need to transport equipment to the operating areas for construction of this area and the Quarry Access Road.

In order to quantify the effect of this scheduling, the construction noise assessment in the NVIA (Octave, 2026) has been updated to reflect an initial schedule that includes the following activities.

- Month 1: Construction of the Secondary Access Road, in conjunction with site establishment works for the Extraction Area, Processing Area, and Visibility Barrier.

- Month 2-4: Construction of the Quarry Access Road, in conjunction with ongoing site establishment works for the Extraction Area, Processing Area, and Visibility Barrier.

Commencement of extraction and processing within the Stage E1 Extraction Area may occur within Month 5 of construction but would require the completion of the Quarry Access Road before any material is transported offsite.

The NVIA was updated to include an assessment of worst-case cumulative construction noise from site establishment and construction activities. This included two construction scenarios for Month 1 and Month 2 to Month 4.

The outcomes of assessment are provided in Table 43 and Table 44 of the NVIA. In summary, the conclusions to assessment remain the same, that is that total construction noise levels will remain below the Highly Noise Affected Level at all nearby sensitive receivers. However, total noise levels from construction in Month 1 were calculated to exceed the noise affected level at residences within:

- NCA 5 at minimum and average distances; and
- NCA 6 at the minimum distance.

Total noise levels from construction for Month 2 to Month 4 were found to exceed the noise affected level at residences within:

- NCA 4 and NCA 5 at minimum and average distances; and
- NCA 6 at the minimum distance.

Additional construction noise mitigation and management has been outlined where feasible and reasonable to minimise construction noise impacts.

The barrier to be constructed along the Quarry Access Road would be constructed coincident with the road construction works where practical, however it cannot be guaranteed that this would be in place and provide a noise mitigation benefit for road construction. It is therefore preferred that construction noise and the mitigation applied considers worst-case outcomes.

While the outcomes to the construction noise assessment remain unchanged, the level of mitigation has been advanced. It remains the intention of the Applicant to consult with the community on construction activities, including scheduling so that the community is aware of road construction works occurring over the short period proposed and possible mitigation can be discussed directly with potentially impacted landowners.

Comment

It is EPA's expectation that as soon as the quarry transports any saleable product off site, construction activities are assessed under the guidance in the Noise Policy for Industry (NPI). The construction noise assessment should clarify when in the construction timeframe this is estimated to occur so that future activities from this point in time are included in the assessment of operational noise under the NPI.

Response

Transport of saleable product off site would occur following construction of the Quarry Access Road which is anticipated to occur in Month 5 of the construction timeframe.

Comment

The NVIA should provide additional information on the assumed locations for plant and equipment (preferably with a map) when modelling the predicted construction noise levels.

Response

Figure 14 of the updated NVIA presents the minimum assumed construction working distances for the secondary access road and Figure 15 of the updated NVIA presents the minimum assumed construction working distances for construction of the Quarry Access Road.

Comment

The discussion in Section 13 on mitigation for construction noise does not outline any reductions that can be made to minimise the noise impact at receivers. Given the predicted construction noise levels are up to 69dBA, the EPA recommends that the NVIA is revised to include specific mitigation to reduce construction noise levels at residential receivers, as per the guidance in the Interim Construction Noise Guideline, and/or management measures to minimise impact. For example respite periods for use of the rock breaker when operated in close proximity to residential receivers.

Response

Section 13 of the updated NVIA provides specific mitigation and management measures that would be implemented in relation to construction noise impacts. Further opportunities to reduce or minimise construction noise are presented in Appendix I of the NVIA. Where appropriate, noise reduction has been quantified for these activities. The following measures are described to reduce construction noise levels at residential receivers or minimise impacts, where they can be implemented.

- Where practical, construction of the acoustic barrier would be staged so that it can act as a barrier to noise generated by construction of the main access road.
- Prioritise using low power equipment where available and practical.
- Fit all equipment with “residential grade” exhaust silencers.
- Regularly inspect and maintain equipment to ensure that it is in good working order and not generating excessive noise.
- Locate laydown areas as far as practical away from sensitive receivers.
- Use broadband (non-tonal) background-adjusting reversing alarms.
- Proactively consult with the community on proposed construction activities, including the provision of direct contacts for complaints.

The above would proactively reduce noise generation, minimise the number of maximum noise events and audibility of construction above ambient background levels at sensitive receivers.

Comment

The EPA recommends that the road traffic noise assessment includes an assessment of potential noise impact from traffic generated on the local roads with vehicles using the secondary access road. This is particularly important for vehicles using the secondary access road until the primary access road is constructed, however all traffic generated on the local roads by the proposed development should be assessed in accordance with the Road Noise Policy.

Response

The NVIA was updated to include an assessment of traffic noise generated prior to construction of the Quarry Access Road. The impact of construction vehicles using the Secondary Access Road was assessed at 7 Mates Drive, the most sensitive receiver and results were shown to comfortably comply with the *NSW Road Noise Policy* (DECC, 2011).

Comment

The EPA considers the grading of access roads twice per month to be routine maintenance, therefore as per Fact Sheet C of NPfI the duration correction does not apply to this activity. The NVIA needs to include management/mitigation measures to reduce the impact from grading, or seal the section of road closest to sensitive receivers to minimise noise levels to achieve the criteria without the duration correction applied.

Response

To reduce the noise impacts to the receivers nearest to the Secondary Access Road, the first 120m of the Secondary Access Road would be sealed as presented **Figure 3.2** and Appendix C of the updated NVIA. Noise modelling for operational impacts was updated to include graders along the unsealed portion of the Quarry Access Road and Secondary Access Road only, and results indicate that noise levels would comply with the relevant noise trigger levels at all nearby sensitive receivers.

Comment

The EPA notes that different sound power levels are references throughout the report. For example, the report states that the grader has a sound power level of 108dB in Section 10.1.2 but in Table 40 states it to be 110dB. The front-end loader is reported as 110dB in Table 31 but is reported to be 113dB in Table 40. The EPA recommends that the NVIA should clearly present a reasonable worst-case scenario so that it is clear to neighbours.

Response

Sound power levels used in the construction noise assessment are presented in Table 42 of the NVIA, with typical sound power levels obtained from Table A1 in *Appendix A of Australian Standard AS 2436 Guide to Noise and Vibration Control on Construction, Demolition, and Maintenance Sites*. All equipment was assumed to operate continuously and concurrently, however in practice construction equipment would typically operate intermittently and it would be unlikely that all equipment is operating at once. Results using the given sound power levels would remain below the Highly Noise Affected Level at all nearby sensitive receivers for construction at any location along the access roads.

Comment

The EPA considers the statement in Section 10.1.1 that sufficient data is not available to make an assessment of the potential for low frequency and tonality, in accordance with the NPfI, is not adequately justified. As for the potential low frequency noise from the proposal has been identified in the NVIA, the EPA recommends that the predicted noise levels are revised to include the appropriate correction before comparing the levels against the Project Noise Trigger Levels, as described in the NPfI, and any necessary mitigation measures implemented to reduce predicted noise levels down to the Project Noise Trigger Levels.

Response

A low frequency noise assessment was included in the updated NVIA to consider low frequency noise risk. Given the large distance between noise sources and residences it is considered unlikely that low frequency noise would be a potential risk that requires assessment. Preliminary risk-based assessment has been completed that included information available in published literature for quarrying operations. The assessment concluded that a low frequency noise correction is not required at any residence (see Section 10.1.1.1 of the NVIA).

Octave Acoustics (2026) has reiterated its original conclusion that insufficient information is available to adequately assess tonality for the Project, noting that tonal noise impacts for quarrying activities are not a considerable risk.

These conclusions notwithstanding, if required the Applicant would include low frequency and tonal noise validation assessments as part of compliance monitoring at the post potentially affected sensitive receivers to ensure that noise levels are compliant with the Project Noise Trigger Levels. It is common for noise monitoring to be undertaken during different stages of operations to validate noise assessment outcomes.

4.1.2.3 Surface Water Management

Comment

Section 4 of the SWMR outlines consideration of Water Quality Objectives and appears to adopt the default trigger values in the ANZECC Guidelines. ANZECC guidelines do not consider the default trigger values to be the primary trigger values and it is more appropriate to conduct a site-specific water quality objective assessment to derive trigger values. EPA considers this of importance when considering any off-site water discharges.

Response

As the Project is a greenfield development, insufficient site-specific water quality data are currently available to derive statistically robust site-specific Environmental Values (EVs). Accordingly, the revised SWMR clarifies the framework for the development of site-specific EVs through the proposed surface water monitoring program (see Section 3.3.3 and Section 4.1 of the SWMR). Monitoring would be undertaken at the proposed discharge locations for key water quality indicators, including at a minimum pH, electrical conductivity, total suspended solids, turbidity, oil and grease, and visible pollutants (see Section 8 of the SWMR). Site-specific EVs would be derived from a minimum of two years of background monitoring data and progressively refined in consultation with the NSW EPA. This program of monitoring would be presented in the Water Management Plan to be prepared prior to the commencement of the Project. Specifically, the frequency, location and monitoring parameters would be selected following consultation with the EPA and would include all monitoring requirements specified by the EPL.

Until sufficient data is available to establish site-specific EVs, monitoring results would be assessed against the default trigger values (ANZECC/ARMCANZ, 2000 and ANZG, 2018) as described in Section 4.2 of the SWMR (SEEC, 2026).

Comment

The sediment basin design in Section 5.2.1 details the design during the construction phase. The sediment basin sizing and other standards that will be adopted during the operational phase of the proposal was not clarified in the SWMR. It appears that sediment basins are designed to contain up to a 95th percentile 5-day rainfall during the operational phase which equates to 33mm. Although the SWMP correctly identifies that a water management hierarchy will be established to use water for irrigation and dust suppression in favour of discharge to the environment, the EPA is concerned that the sediment basin sizing will potentially result in a high number of dirty water discharges per year. Where discharges of sediment laden water to the environment are proposed, the SWMR must clearly show how the discharges will protect the NSW Water Quality Objectives for the receiving waterway.

Response

The revised SWMR adopts the EPA's recommended design criterion, with operational sediment basins sized to manage the 1-in-10 year, 24-hour rainfall depth of 96.5mm, rather than the 5-day 95th percentile rainfall depth of 33mm applied in the exhibited EIS.

In response to the EPA's comments, the Applicant reviewed various options for increasing operational storage capacity and reducing the potential for uncontrolled discharge. Noting that the Eastern and Southern Dams could not be expanded without increasing physical disturbance, principal options evaluated were as follows.

- Retaining the original basin sizing based on the Blue Book design criteria with detained water treated and discharged as required to maintain capacity.
- Adopting the revised sediment basin design based on the 1-in-10-year, 24-hour rainfall event and also incorporating strategic transfers to the pit sump and increased internal storage capacity. This would allow captured runoff to be retained within the Project Site's water management system and transferred internally prior to needing controlled discharge, where required.
- Adopting a reduced operational freeboard approach, whereby within five days following a high rainfall event water would be transferred or discharged from sediment basins to approximately 50% of the required available freeboard allowance. This would maximise onsite water retention and reuse opportunities, reducing controlled discharge volumes but would increase the potential for uncontrolled discharge during successive rainfall events.

The original Blue Book-based operational design did not provide the increased operational storage capacity sought by the EPA for the operational phase of the Project, however was useful for comparison. The reduced freeboard approach was not adopted as it would depart from the operational storage requirements of the Blue Book and increase the potential for uncontrolled discharges during successive rainfall events. However, this method would reduce the total volume of water discharged (controlled and uncontrolled) as it principally prioritises holding water back for on-site use. Accordingly, the revised operational water management strategy,

incorporating the in 10-year, 24-hour sediment basin design that incorporates increased storage capacity in the pit sump, Northern Dam and Processing Area Dam and internal transfer of captured runoff, was adopted as the basis for the revised SWMR and water balance assessment.

The Extraction Pit Sump has been increased from the previously modelled capacity of 5ML to between 10.8ML and 25.7ML over the Project life. It is noted that the location and size of the pit sump would vary depending on the progress of development. The Processing Area Dam has been increased from 10.7ML to between 16.1ML and 32.2ML, representing an additional 5.4ML to 21.5 ML of storage, depending on the stage of development. The Northern Dam would provide between 10.4ML and 15.1ML of storage, compared with the previously adopted capacity of 11.1ML over the Project life. During rainfall events, water from the Eastern and Southern Dams would be pumped to the Processing Area Dam once the required freeboard is exceeded.

Given that retained rainfall runoff is an important water source for the Project, it should be made clear that controlled discharge would be treated as a last resort, with water treated and discharged in accordance with the applicable water quality objectives as described in Section 8 of SEEC (2026) and specified in the Quarry Water Management Plan and EPL.

This design revision increases operational storage capacity to provide the required 1-in-10-year, 24-hour capture volume requested by the EPA, while maintaining the ability to return sediment basins to the required available storage capacity within five days following rainfall where practicable. This approach prioritises avoidance of uncontrolled discharge, while still maximising opportunities for reuse of captured water on site.

The adopted water management hierarchy prioritises on-site reuse of captured water for dust suppression, and irrigation of vegetated tree screening or rehabilitation areas. Captured dirty water may also be transferred internally, including to the enlarged pit sump or Processing Area Dam, to maximise storage capacity and reduce reliance on discharge. As described in Section 3.3.3, controlled discharge would only occur where:

- heavy rainfall has made the site too wet for beneficial onsite re-use such as dust suppression; and/or
- the volume of detained surface water exceeds what can be feasibly re-used onsite prior to the next rainfall event; and/or
- heavy rainfall has made land application onto nearby vegetated or revegetation areas impossible; and/or
- there are no suitable onsite re-use options available in reasonable proximity to the detained body of surface water.

Any controlled discharge would be subject to the applicable treatment, monitoring and applicable water quality criteria as described in Section 3.3.3 and Section 8 of the SWMR (SEEC, 2026).

The water balance assessment has been updated to reflect the adopted operational storage configuration, staged catchment development, internal transfers and operational water demands. The revised strategy would materially reduce the risk of uncontrolled discharge, provide greater operational storage resilience during rainfall events, and minimise the volume of dirty water requiring discharge to receiving environments.

Comment

Section 5.2.2 of the SWMP outlines intend (sic) to use non-toxic flocculants and coagulants to treat water prior to discharge. EPA considers that any use of flocculants or coagulants should be supported by a robust ecotoxicology assessment undertaken on the proposed coagulants and/or flocculants that demonstrates that the proposed chemical will not pollute the receiving waterways.

Response

The revised SWMR has been updated to clarify that any chemical treatment requirements would be determined on a site-specific basis once the characteristics of the disturbed soils, detained water and proposed treatment product are known.

Prior to adopting a particular coagulant or flocculant, jar testing would be undertaken using representative soil samples or dirty runoff collected from the Project Site. The testing would be used to determine the effective dose concentration, the potential effect on pH and relative settling performance. This testing would be undertaken prior to construction and would be ongoing as different soils are encountered across the site (spatially and at different depths).

Typical dosage rates are expected to be in the order of 20ppm to 100ppm for commonly used liquid products such as Turbifloc - chitosan. Though the adopted chemical additive may change over the life of the Project, any proposed flocculant or coagulant would be subject to a site-specific assessment that may include processes to evaluate potential impacts on the receiving environment, assess degradation and accumulation potential, include NATA-accredited ecotoxicology testing of both the product and treated discharge, and establish a monitoring program to demonstrate compliance with applicable trigger values and water quality criteria. The specific requirements would be determined in consultation with the EPA. Further detail regarding the assessment framework to be applied to potential chemical additives is available in Section 5.2.2 of the revised SWMR.

Selected products, dosing procedure, assessment outcomes, monitoring parameters and associated operational controls would be documented in the Water Management Plan and refined in consultation with the NSW EPA before the flocculant or coagulant is used.

4.1.3 DCCEW – CPHR

Comment

The offset obligation could be staged in two stages reflecting the proposed project, and these should reflect the offset obligations for each stage (separate BAM cases may help to set out clearly the credits required for each stage).

Response

The BDAR presents staged biodiversity offset obligations aligned with the proposed staging of the Project. The credit obligation would be met in two stages comprising Stage 1 – Site Establishment and Stage 1 Extraction and Stage 2 – Extraction Area Development. Separate BAM Child Cases have been prepared for each stage and are presented in the updated BDAR (Capital Ecology, 2026 – see **Appendix 7**), with applicable ecosystem and species credit obligations identified for each. Surface disturbance within each stage would not commence until the biodiversity credit obligations applicable to that stage have been satisfied.

Comment

- Increase the indirect impact calculations to 50-60% loss to 10m from the clearing edge, then 20% to 50m
- Include requirements for a TARP and triggers for adaptive management, reporting and further offsetting for where monitoring indicates indirect/ uncertain impacts have exceeded that predicted by the BDAR, and
- Clarify locations/areas that must be subject to BMP actions & monitoring – pre construction, during construction and post construction/ ongoing.

Response

The approach applied in the BDAR presented with the EIS for predicted indirect impact assumptions has been retained as the outcomes were based on careful consideration of the nature of impact associated with the Project and available scientific evidence. It is noted that the BAM is not clear on the preferred approach to indirect impacts and it is considered that the approach applied by Capital Ecology, which accounts for potential reductions in biodiversity value associated with noise, edge effects and dust within defined distances of the Extraction Area, Processing and Stockpiling Area and Quarry Access Road, remains appropriate. These predicted reductions have been incorporated into the BAM Calculator through reductions to vegetation integrity scores and are presented in Table 31 and Section 3.5.2 of the BDAR (Capital Ecology, 2026).

The revised BDAR also clarifies the areas and management activities that would be subject to the Biodiversity and Rehabilitation Management Plan (see Section 3.3.1 of Capital Ecology, 2026). Proposed mitigation measures have been designated to management areas to clearly demonstrate where these would be applied. Management measures would include staged clearing and pre-clearance protocols, protection of retained vegetation, erosion and sediment controls, dust management, weed and pest management, and ongoing monitoring of retained native vegetation and habitat. The Biodiversity and Rehabilitation Management Plan would also include reactive and adaptive management measures to address any unforeseen impacts to significant vegetation and habitat in areas adjacent to the development footprint.

Comment (paraphrased)

CPHR considered that the extent of direct and indirect impacts on Small Purple-pea (Swainsona recta) had not been fully characterised, particularly given the proximity of the Project to a Saving our Species monitoring location and the occurrence of the species adjacent to the disturbance footprint. CPHR recommended that species polygons and indirect impact extents be further assessed and incorporated into the offset calculations.

CPHR considered that direct and indirect impacts to Small Purple-pea (Swainsona recta) may constitute a Serious and Irreversible Impact (SAII) due to the species' restricted distribution and limited area of occupancy. CPHR recommended that a SAII assessment be prepared and that additional avoidance, minimisation and management measures be considered.

Response

A SAII assessment for Small Purple-pea has been included in Appendix L of the updated BDAR (Capital Ecology, 2026). The assessment concludes that the Project is unlikely to fragment the existing population and would impact a small proportion of the known plants within the adjacent rail corridor and broader population.

A Small Purple-pea (*Swainsona recta*) Management Plan has been prepared in response to CPHR's comments and is included within the updated BDAR (**Appendix 7**). The Plan provides a framework for the identification, monitoring and management of direct and indirect impacts to Small Purple-pea habitat, including consideration of potential impacts associated with dust deposition, sediment mobilisation, hydrological changes and heavy vehicle movements. The Plan establishes exclusion zones, erosion and sediment controls, weed and dust management measures, and a monitoring and adaptive management framework to validate predicted impact extents and implement corrective actions where required. The Plan also provides for consideration of translocation in consultation with the Saving our Species program and other relevant specialists. It is anticipated that the Plan would be updated and incorporated into a Biodiversity and Rehabilitation Management Plan for the Project should the Project be approved.

Comment (paraphrased)

CPHR noted that Pale Pomaderris (Pomaderris pallida) is a Serious and Irreversible Impact entity and recommended that opportunities for additional micro-siting and implementation of appropriate management measures be considered to further reduce impacts.

Response

The BDAR assesses the Pale Pomaderris (*Pomaderris pallida*) as a SAIL entity and provides detailed consideration of the potential impact in Section 3.4.2 of the BDAR. The Project would directly impact the plant in two locations, each of which support a single plant. This has been assessed as 0.56ha of the 2.52ha of mapped Pale Pomaderris habitat within the property. Accordingly, approximately 78% of mapped habitat and more than 99% of the estimated Pale Pomaderris plants within the Property would be avoided.

The Project design has been developed following consideration of alternative extraction areas and the distribution of threatened flora and fauna habitat, with the selected Extraction Area characterised by a comparatively low occurrence of threatened species. The revised BDAR concludes that sufficient habitat would remain to maintain connectivity and viability of the retained Pale Pomaderris population and that the mitigation measures identified in Sections 3.2 and 3.3 of the BDAR, including implementation of the Biodiversity and Rehabilitation Management Plan, are sufficient to manage identified threats to retained habitat. On this basis, the Project is considered unlikely to result in a Serious and Irreversible Impact to Pale Pomaderris.

Comment

Southern Myotis should be surveyed for in the disturbance footprint as per the BAM and TBDC, and offsets assessed in the BDAR.

Response

Threatened microbat survey was conducted using three Anabat passive ultrasonic recording devices placed at the Property between 13 February 2026 and 18 February 2026. Data collected of a combined total of 16 survey nights were used for the analysis. The results of the survey are presented in the updated BDAR (Capital Ecology, 2026) and discussed in Section 3.3.6.

While a small number of ultrasonic calls were assigned to a broad species group that includes Southern Myotis, the species could not be confidently identified. Consistent with the specialist's recommendations, the likelihood of occurrence was therefore assessed using the survey results together with the species' known ecology and habitat requirements.

The updated assessment concluded that the subject land does not provide the key habitat attributes typically associated with Southern Myotis. Specifically:

- the site is approximately 98km inland from the coast;
- no large permanent waterways occur within the subject land, with the nearest substantial waterbodies being the Murrumbidgee River (approximately 5km west) and Googong Dam (approximately 7km east);
- inspection of all dams within the disturbance footprint and a 200m buffer found that most were dry, while the remainder were either heavily silted or lacked suitable fringing vegetation, resulting in only marginal habitat quality; and
- there are only two known records of Southern Myotis within 25km of the site.

Based on the targeted survey results, the absence of confirmed Southern Myotis detections, the limited extent of potential habitat and the lack of key habitat features required by the species, the updated BDAR concludes that Southern Myotis is unlikely to occur within the subject land. Accordingly, no species credits have been generated for Southern Myotis.

4.1.4 DPHI - Crown Lands

Crown Lands provided a submission to DPHI noting that Crown land and several Crown roads occur within the project footprint. The submission identified several land tenure and approval matters requiring consideration, including the use and occupation of Crown land, access arrangements for Crown roads, and the need to obtain any necessary approvals under the *Crown Land Management Act 2016* and *Roads Act 1993*. The following summarises Crown Lands' comments and provides a response to each matter raised.

Comment

The Crown land subject to the proposal includes Lot 7002 DP 1019607 (...) [this] land is reserved for the purposes of Trigonometrical Purposes. The land is currently held under licence for the purposes of Grazing.

Any use or occupation of the Crown land during the assessment phase will require consultation with Crown Lands to obtain the necessary authority under the Crown Land Management Act 2016 and/or the Roads Act 1993.

Response

The Applicant acknowledges that separate approvals and tenure arrangements may be required and will continue to consult with Crown Lands and obtain all necessary approvals prior to use or occupation of Crown land and roads. Crown Lands provided a deed agreement authorising access for the purpose of completing subsurface investigations to inform the Aboriginal Cultural Heritage Archaeological Report (as described in Section 3.3.4).

Comment

If Crown roads are required for access, they may need to be transferred to Council, or an application made to close and purchase the roads. Interim tenure may be required to avoid delays.

Authority to use, traverse, access, or construct infrastructure on Crown land and roads is required under the Crown Land Management Act 2016 and/or the Roads Act 1993. It is recommended that the proponent contact Crown Lands as early as possible to discuss and initiate the necessary processes to authorise the use of and/or access to Crown land and roads. If infrastructure is to be built on Crown land or roads, consent from the Minister for Water, Property and Housing (via Department of Planning, Housing and Infrastructure | 25/07992#19 5 Crown Lands) will be required. Constructed roads may also need to be transferred to Council.

Response

Figure 3.1 presents the principal components of the Project and includes where access to the Project Site would cross or use Crown roads. The Applicant will continue consultation with Crown Lands to determine the appropriate tenure and approval pathway for any Crown roads required for access or infrastructure. These arrangements would be finalised before commencement of the Project should an approval be granted.

4.1.5 NSW Rural Fire Service

The NSW Rural Fire Service (RFS) provided a submission to DPHI regarding bush fire management for the Project. The RFS recommended that a Fire Management Plan be prepared for the proposed facility and provided to the local RFS District Office for review. The submission also outlined the minimum matters to be addressed within the Fire Management Plan. The following summarises the RFS comments and provides a response to the matters raised.

Comment

The NSW Rural Fire Service (RFS) recommended that a draft Fire Management Plan (FMP) be prepared for the Project and provided to the local RFS District Office for review. The RFS advised that the FMP should include, at a minimum, emergency contact details, site infrastructure plans, firefighting water supply arrangements, site access and internal roads, asset protection zones, identification and management of hazards that may affect firefighting operations, measures to prevent fires occurring on site or escaping from the site, and any additional matters required by the local RFS District Office.

Response

The Applicant acknowledges the recommendations of the NSW RFS and would prepare a Bushfire Management Plan for the Project in consultation with the local NSW RFS District Office. The Plan would incorporate the matters identified by the RFS and any additional requirements identified during consultation.

4.1.6 Queanbeyan-Palerang Regional Council

Comment

The Environmental Impact Statement, prepared by RW Corkery, August 2025, indicates an initial construction period of six (6) months. Whilst the proposed heavy vehicle connection to Monaro Highway is constructed, impacts to residents on Monaro Station Road and Mates Drive during the initial works are considered likely due to the movement of heavy plant on these roads.

Officers recommend that time restrictions be placed on the movement of any heavy machines via Old Cooma Road, Monaro Station Road and Mates Drive to reduce noise impacts to residents in early morning and late afternoon. This is discussed further in terms of additional considerations.

Response

It is noted that construction traffic would be at low levels compared to operational traffic (that would use the Quarry Access Road) and the construction period would occur for an estimated six months (with the Quarry Access Road constructed by month four and thereafter available for access). The proposed operating hours for the construction period would be consistent with standard construction operating hours applied across NSW. That is, operations for construction may only occur between 7:00am and 6:00pm Monday to Friday and between 8:00am and 1:00pm on a Saturday. There would be no activity on a Sunday or public holidays. Any blasting activities that are required would only occur between 9:00am and 5:00pm Monday to Friday. These hours are consistent with the standard hours recommended by the EPA in its guidelines on construction noise¹. There are also allowances in the EPA guidance for activities that may occur outside this time and these include the delivery of over-sized equipment (in order to avoid peak traffic times) and for emergency works.

Comment

Clarification is sought on the schedule of initial plant movement to the site for quarry establishment works. i.e. quantity of plant, timing of proposed plant movements and whether it is intended for plant to remain on the site until the new heavy vehicle access road is constructed.

Officers suggest that movements of plant to the site could be restricted to the commencement of operations only, with plant remaining on the site, wherever feasible, until the permanent Heavy Vehicle access road is usable. This is to prevent unnecessary use of Old Cooma Road, Monaro Station Road and Mates Drive from becoming frequently used Heavy Vehicle access routes.

Officers suggest that a condition of consent be used to restrict heavy plant transport via Old Cooma Road, Monaro Station Road and Mates Drive as follows:

- 1. Heavy Vehicles associated with the quarry construction do not use Old Cooma Road during the same timeframe as the local school bus routes,*
- 2. Where feasible, plant delivered to the site during initial construction remain on site until the new Heavy Vehicle access road is usable,*
- 3. A dilapidation survey of the condition of Old Cooma Road, Monaro Station Road and Mates Drive is completed prior to any works commencing, and*
- 4. The proponent to either complete, or fund, repairs to restore abovementioned roads to the condition documented by the dilapidation survey.*

¹ See [Construction noise | EPA](#)

Response

During the construction period (approximately 6 months), light passenger vehicles (such as utes) would arrive in the morning in time to start work and depart at the end of the day. Delivery of materials would occur in larger vehicles over the day to supply the materials needed for construction work. It is anticipated that larger vehicles needed to transport mobile equipment for the work would occur at the commencement of work with equipment to be kept at the Project Site for the duration of construction works as much as possible. This equipment may be supplemented by additional equipment as aspects of the development progress or may be replaced in the event of breakdown. The transport of large equipment would not be a daily or weekly requirement. The Road Transport Assessment for the Project (TTPP, 2026) considered up to 40 light vehicles and four heavy vehicles per day with 10 loads to transport large equipment as a guide to assessing traffic generation for the Project.

Access to the Project Site for construction vehicles (light and heavy vehicles) would be via the Secondary Access Road, Mates Drive, Monaro Station Road, and Old Cooma Road until construction of the Quarry Access Road has been completed.

Monaro Rock acknowledges Council's recommendations regarding the management of construction traffic on the Secondary Access Road during the site establishment phase of the Project. While the Applicant is unable to commit to avoiding the use of Old Cooma Road during school bus operating times, measures to minimise potential interactions between construction traffic and other road users including school buses would be incorporated into a Driver's Code of Conduct for the development. Given the low level of traffic generation over this period, it is considered that this is an appropriate measure to manage transport-related risks.

Monaro Rock is comfortable to consider a commitment to a road dilapidation assessment before and following the site establishment phase of the Project and would include that in further discussion on the terms of a Planning Agreement. Any impacts caused by construction traffic on Mates Drive, Monaro Station Road, and Old Cooma Road would be remedied at the cost of Monaro Rock, however given the low level of traffic generation, substantial road degradation is considered unlikely to occur.

Comment

The Environmental Impact Statement, prepared by RW Corkery, August 2025, notes that the proposed operational heavy haulage route is to be by direct connection to the Monaro Highway within the ACT. Officers recommend a condition of consent which prohibits HV movements to and from the site during the operation phase of the development by any other access route.

Further in relation to the proposed new road, officers note that:

- 1. There is a likelihood of dust nuisance from usage of any proposed new road if that road is not sealed. Officers recommend sealing of this road be included as a condition of consent, and*
- 2. This proposed road services only the quarry and accordingly, should remain as a private road with all maintenance obligations remaining with the proponent.*

Response

The Project has been designed so that the principal access route would avoid Old Cooma Road for operational quarry haulage, with all operational heavy vehicles directed to a dedicated Quarry Access Road and intersection with the Monaro Highway. This design decision was made

specifically to reduce the exposure of local roads to quarry traffic and potential amenity impacts. Monaro Rock has regularly repeated its commitment that product despatch and heavy vehicle traffic would not use the Secondary Access Road and would be comfortable that this be included as a condition of consent. It must be noted that before the Quarry Access Road is constructed, the Secondary Access Road would be the only available access road for construction vehicles. The proposed access road has been designed as a sealed road for approximately 2.7km from the Monaro Highway intersection, including the section adjacent to the Goulburn Bombala Railway corridor. Sealing of this section is intended to minimise dust generation and associated impacts on surrounding receivers and road users. Monaro Rock has also now committed to sealing the first 120m of the Secondary Access Road from the intersection with Mates Drive. The Quarry Access Road would be managed and maintained by Monaro Rock as a private road in accordance with the requirements of any development consent and other relevant approvals.

Comment

Officers emphasise that the recommendations outlined in the Traffic Impact Assessment (August 2025) should be implemented and Council kept informed in relation to the Project's progress.

Response

Traffic associated with the Project would be managed in accordance with the recommendations and mitigation measures identified in the Traffic Impact Assessment (TTPP, 2026) and through the implementation of appropriate management plans and any relevant conditions of consent. The Applicant will continue to engage with Council regarding the progression of the Project and matters relating to traffic management where appropriate.

Comment

The development seeks operational hours to commence for the movement of product at 5am, including Saturdays. Whilst this may not include quarrying/processing activities, this will result in heavy vehicle movements within the period defined as "night" in the NSW Environment Protection Agency's Noise Policy for Industry 2017. Council officers consider this activity will likely disturb residents and recommend that hours of operation should be conditioned to commence from 7am on both weekdays and Saturdays in order to maintain the existing amenity of the area.

Response

The Noise and Vibration Impact Assessment (Octave, 2026) specifically assessed Project operations during the night period (5:00am to 7:00am) under two scenarios, including both standard and noise-enhancing meteorological conditions (see Section 10.1.1, Table 32 of Octave, 2026). The assessment concluded that predicted operational noise levels at surrounding receivers would comply with the applicable night-time criterion of 35 dB(A) $L_{Aeq,15min}$. Accordingly, the proposed commencement of product transport movements from 5:00am is not predicted to result in unacceptable noise impacts at surrounding receivers and is therefore considered acceptable from an operational noise perspective. The proposed noise barrier along the Quarry Access Road would mitigate noise generated by vehicles entering and exiting the Quarry in the morning period.

The morning period is essential for quarrying operations that produce aggregates that support concrete production and deliver material directly to the construction industry. As operating hours on construction sites across the region would most likely meet standard commencement times of

7:00am on weekday mornings, the activities rely on the prompt delivery of concrete and materials in order to efficiently occur. The peak periods for the transport of materials would occur during the morning as materials are delivered directly to construction sites or to the concrete plants to replenish materials once the initial concrete deliveries have been despatched (that would have used up materials delivered on preceding days). The level of mitigation applied in designing the Project has been selected to enable these operating hours and the technical assessment demonstrates it is acceptable. The location of the Quarry Access Road was deliberately selected to minimise amenity risks to the community and although it is more complex to develop, remains the preferred alternative for the Project.

Comment

Greater detail around the visual treatment of the proposed 3m high acoustic wall along the proposed access road to Monaro Highway is requested. The length of this wall will encompass two sides of a neighbouring property and therefore would potentially have a significant visual impact in a rural landscape.

Council - Preliminary Submission

The Visual Impact Assessment (included as Appendix F to the EIS) finds that the project risks transforming the character of a rural landscape into an industrial one, affecting residents' sense of place. In some cases, residents would see the quarry from their home. The impacts of these proposed changes were determined by the EIS to be moderate.

A sense of place, or place attachment, is derived from people's relationship with the environment in which they live. It can be considered an ecosystem service that provides physical and psychological benefits to people including a sense of community and of belonging.

The Millenium Ecosystem Assessment (United Nations, 2005) described a sense of place as the relationship between people and ecosystems, and as a natural condition indispensable for human existence. A moderate change to people's sense of place is an undesirable outcome of the project that cannot be mitigated and therefore is a matter of concern.

Council - Supplementary Submission

Response

The potential for the community to see aspects of the Quarry has been recognised in the Visual Impact Assessment (RWC, 2025), including views of the noise barrier along the access road. The proposed barrier is included as a measure to mitigate possible amenity impacts but would change the outlook for the landowners adjacent to the Quarry Access Road. However, Monaro Rock consider this aspect of the Project to be similar to the construction of a fence adjacent any neighbouring property. The final design of the acoustic barrier has not been fixed and may comprise a range of materials, including lapped timber paling, fibre cement sheeting, lightweight aerated concrete, transparent acrylic panels, glass or profiled sheet cladding, provided the required acoustic performance specifications are achieved. The design also incorporates measures to accommodate fauna movement whilst maintaining acoustic performance. Final design of the acoustic wall would consider opportunities to minimise visual impacts, including the selection of appropriate materials, colours and finishes having regard to the rural character of the surrounding landscape and the proximity of neighbouring properties.

Monaro Rock acknowledges that the Project may result in a change to the visual character of the local area and that some nearby residents would experience changes to their outlook. However, the Visual Impact Assessment (R.W. Corkery, 2025) concludes that visual impacts have been substantially minimised through project design, including use of existing landforms to screen the extraction area, construction of a substantial visibility barrier, progressive revegetation, tree screening and progressive rehabilitation. This is evidenced in the photomontage preparation that was presented with the assessment.

Comment

As the site will be defined as a private drinking water supplier under the Public Health Act 2010 a water Quality Assurance Plan (QAP) should be prepared and provided to NSW Health. Officers request an opportunity to review and comment on the QAP.

As effluent is proposed to be disposed of on the site, additional information is required. Officers request provision of an effluent report to determine:

- 1. A suitable disposal system,*
- 2. A suitable disposal area, and*
- 3. The necessary size of the disposal area.*

On-site effluent disposal will require approval from Council in accordance with the Local Government Act 1993

Response

The Project is not proposing to utilise captured rainwater or other onsite water sources for potable water supply. Drinking water for site personnel would be supplied externally, while any water captured and stored onsite would be used for ablution and operational purposes only.

Sewage and effluent generated onsite would be managed using an appropriately designed onsite treatment system, either as a biocycle system or through regular servicing and pump-out by a licensed contractor. The detailed design of the onsite wastewater management system, including the selection of an appropriate treatment and disposal method and, where required, identification and sizing of any associated land application area would occur during construction. The final design and implementation of the system would be prepared in consultation with Council and any necessary approval requirements. Therefore, any Quality Assurance Plan (QAP) for drinking water and effluent management system would be finalised following receipt of an approval for the Project.

Comment

Council officers have been engaged in relation to a Voluntary Planning Agreement (VPA). A contribution rate of 12.5c/t of extracted product to be put toward community driven initiatives and projects in the Royalla, Fernleigh Park and Googong localities has been proposed. The Proponent intends this to replace other contribution mechanisms (7.11 Developer Contributions) for extractive industries, on the grounds that there is a direct connection to the Monaro Highway rather than the Council's road network.

However, it is noted that Old Cooma Road is the logical travel route for deliveries of quarried product to the east. Despite the direct connection to the Monaro Highway, it is considered probable that Old Cooma Road may accommodate the majority of eastbound laden truck movements. Accordingly, it is suggested that this should be captured through a condition of consent that requires contributions to be paid in accordance with the relevant Council S94/S7.11 contributions plan for extractive industries. Alternatively, this matter could be addressed by inclusion in any VPA offer.

Response

The Applicant maintains that the majority (95%) of vehicles transporting quarry products would turn right at the intersection of the Quarry Access Road and the Monaro Highway. However, it is also acknowledged that some traffic would turn left and that some customers located to the east of the Quarry would be reached via Old Cooma Road. However, the immediate Planning Agreement offer of 12.5c per tonne of material produced is intended to encompass these deliveries through an offer to develop a Community Infrastructure Fund that would support local infrastructure and community-led initiatives, with spending priorities determined through community-led decision-making. The contribution of 12.5c per tonne of product sold would ultimately scale up to \$125,000 per year once production reaches one million tonnes per annum.

As noted above, the Applicant considers that a commitment to undertake a road dilapidation assessment of Mates Drive and Monaro Station Road prior to and following the completion of the site establishment and construction period may be incorporated into a Planning Agreement with the Applicant to fund any repairs determined to have been caused by access for construction activities.

Comment

The air quality impact assessment generally presents an apparently conservative assessment of potential impacts and recognises the variability of mitigation measures based on climatic conditions and local lifestyle habits. However, the use of metrics based on data from the Tuggeranong Valley is not considered appropriate as the quarry site terrain differs significantly from Tuggeranong Valley. The quarry is near the top of a hill with significant increase in altitude over the valley and has significantly less terrain or obstacle impediments to wind.

Response

The Air Quality Impact Assessment (AQIA) was prepared by Northstar (2026) and the assessment undertaken in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022). The assessment has been updated in response to comments from the NSW EPA (see Section 3.3.1). As part of this process, additional meteorological modelling and sensitivity analyses were undertaken incorporating data from the Tuggeranong Automatic Weather Station (AWS) within both the TAPM and CALMET modelling frameworks. These frameworks better represent the topography of the Project Site and how wind conditions may change. The updated assessment concluded that topographical influences act to reduce the frequency of calm conditions at the Project Site relative to the Tuggeranong Valley. That is, conditions are less likely to be calm in the vicinity of the Project Site. Although the revised modelling predicted some marginal increases in incremental particulate matter impacts (for example the maximum predicted 24-hour average PM₁₀ concentration at Residence R2 has increased from 11.2µg/m³ to 11.7µg/m³) there were reduced impacts in other locations. The assessment demonstrated that the Project can be operated in accordance with the adopted air quality criteria and that additional particulate matter exceedances are not anticipated.

Comment

Further, emerging studies and advancements in the understanding of the serious adverse health impacts of respirable crystalline silica suggest that the full impact has not been recognised. With the project proposed to operate for several decades, there is a danger that more conservative recommendations and mitigation measures surrounding the exposure to this dust will not be incorporated into the project.

Response

Section 3.4.2 of the AQIA (Northstar, 2026) specifically identifies RCS as a pollutant of interest associated with quarrying and material processing activities. In the absence of NSW specific air quality criteria for RCS, the AQIA reviewed criteria adopted by Environment Protection Authority Victoria and Environment Protection Authority South Australia, including a literature review undertaken by SA EPA and SA Health. The assessment adopted the South Australian interim criterion of $3\mu\text{g}/\text{m}^3$ (annual average) for the PM_{10} fraction of dust in ambient air, as this approach was considered more conservative than the Victorian criteria that related to $\text{PM}_{2.5}$ only. The assessment also adopted a conservative assumption of a maximum free silica content of 40% by weight when estimating ambient RCS concentrations.

The Human Health Risk Assessment (EnRisks, 2025) determined that with the management and mitigation measures proposed for the Air Quality Management System the health risks to residents in existing properties adjacent to the Quarry are low and acceptable. This notwithstanding, the Project would be regulated during operation by the NSW Resources Regulator and the NSW EPA. The NSW Resources Regulator regulates workplace safety including risks to the workforce associated with dust exposure. Similarly, the NSW EPA regulates pollution risks including risks to community health. It is generally accepted in the mining and quarrying industry that adequate protections for RCS applied for personnel at an active operation would ensure that community health risks are being managed adequately, this is consistent with feedback from the NSW EPA.

Comment

No consideration of the psychological impact of industrial noise is discussed within the health impacts assessment despite numerous studies demonstrating links between industrial noise and psychological harm. Such harm mechanisms include:

- *Increased stress levels,*
- *Anxiety and depression,*
- *Interference with cognitive processes,*
- *Impairment of attention, and*
- *Mental impairment.*

No apparent assessment has been completed as to the possible dust contamination of local residents rain harvested drinking water supply.

Based on above matters, concern is raised as to:

- *The reliability of projected air quality impacts in the surrounding region, including the emerging township of Googong, and*
- *The accuracy of assessment to likely human health impacts.*

Council considers the risk to human health has not been duly addressed and is too great a potential impact to consider without further assessment.

Response

Dust emissions associated with the Project are not anticipated to result in contamination of rainwater tank water at nearby residences. Publicly available advice from the NSW Government on water quality in water tanks indicates that the greatest risks of contamination are from microorganisms such as bacteria and parasites from bird or animal droppings or from roof or plumbing materials². Advice on how to protect water quality in tanks is provided and includes maintenance of the tank and the installation of first flush systems. It should be noted that the Project would not be the only source of dust in the region and predicted dust dispersion at private residences caused by the Project is well below guideline levels set by the NSW EPA.

The Noise and Vibration Impact Assessment (NVIA) was prepared by Octave Acoustics Pty Ltd (Octave, 2026) and concluded that operational noise generated by the Project would comply with the NSW *Noise Policy for Industry* and ACT *Environment Protection Policy* noise limits during all assessed periods, provided the mitigation measures are implemented. On the basis that noise generation would meet the requirements of the NSW EPA for industrial activities in proximity to private residences it is considered that mental health risks associated with industrial noise would not cause significant harm. The noise likely to be generated by quarrying activities would be experienced mostly as a low rumble and the occasional vehicle noise. Irregular blasting would be heard in proximity to the Project Site but would not be a substantial feature of the development.

It is not agreed that the NVIA (Octave, 2026), AQIA (Northstar, 2026) and the Human Health Risk Assessment (EnRisks, 2025) have not adequately considered risks to human health. The Applicant maintains that the risk of impact to human health from the construction and development of the Project is low and acceptable.

Comment

The Social Impact Assessment Report (Appendix N to the EIS) acknowledges the proposed development would constitute a change from a rural environment to an industrial site, with implications for how residents experience their living environment.

The conclusion that people will likely become habituated to the noise and other adverse impacts of the operation of the project (s.6.1.2) is flawed. Existing quarries are distant from the residents who would be most affected by the Monaro Rock Quarry proposal. In addition, the operations of those quarries are less extensive than the Monaro rock quarry proposal, having none of the downstream processing elements. Therefore, a comparison of the impacts on residents of this project with existing quarries is unreliable.

Further, the nearest dwellings to the Monaro rock quarry project would be within 1.5 km. This, added to the multiple operations proposed onsite and extensive hours of operation, means that the impacts on nearby residents would be much greater than current impacts from nearby quarries.

² See the NSW Government website - [Rainwater tanks](#)

Response

The Social Impact Assessment (SIA – Landscape Research, 2025) acknowledges that the Project would introduce an industrial land use into a predominantly rural setting and that this represents a substantive change to the existing environment. Reference to existing quarry operations is included only to provide context regarding cumulative impacts and existing community perceptions, rather than as a basis for predicting community responses to the Quarry. It is therefore not agreed that habituation to the Project presence is not likely. The reference to habituation was as an example from residents closest to those other quarries and scientific evidence on noise impacts that demonstrate that humans do habituate to changes in their noise environment. It is important to note that this is a social impact assessment and does not relate to the NSW EPA's consideration of noise outcomes in accordance with the legislation and guidelines relating to noise from industrial activities in NSW. Section 6.1.2 of the SIA (2025) identifies habituation as one of several assumptions considered further within a sensitivity analysis, informed by evidence of community adaptation to existing quarry operations (in proximity to those quarries). This assumption is considered alongside other social, demographic and adaptive capacity factors and is subsequently tested under alternative scenarios in Section 6.1.4 of the SIA.

Consistent with the NSW *Social Impact Assessment Guideline* (NSW DPHI, 2026), the SIA identifies a Local Study Area focused on the residents most likely to experience the greatest level of social change. The assessment also integrates technical inputs from the noise, air quality, traffic, health risk, surface water, groundwater and biodiversity assessments to inform the evaluation of potential social impacts. It assesses relevant impacts as manageable through design and mitigation measures, including the dedicated haul road to the Monaro Highway, acoustic and amenity barriers, environmental controls for noise, dust, vibration and blasting, transparent monitoring, a formal complaints process and ongoing community engagement.

Comment

While the social impact assessment states that the project supports economic diversification, it is not proposing a new industry. In fact, this would be the fifth quarry in the district. The Holcim quarry operates between Queanbeyan and Googong, off Old Cooma Road, and the Heidelberg Materials Canberra Quarry operates at Williamsdale. The Mugga Boral quarry operates at Symonston and the Hall Boral quarry operates at Jeir.

Response

Monaro Rock acknowledges that quarrying is an established industry within the Queanbeyan-Palerang and ACT regions and that the Project would not introduce a new industry to the regional economy. References to economic diversification in Section 1.4.5 of the SIA relate to the objectives of the *South East and Tablelands Regional Plan 2036* and the Project's potential contribution to a broader and more resilient regional economic base; it does not characterise quarrying as a novel industry.

Comment

The stated benefit of the site being revegetated at the end of the project life is mischaracterised. Rather than a benefit, this is a legal requirement of consent and only necessitated by the fact of the quarry operation.

Response

It is acknowledged that rehabilitation would be a conditional requirement for the Project, consistent with the commitments made in the EIS. The reference to rehabilitation as a social benefit is that some may perceive a benefit in that fact that the closure and rehabilitation of the Project would be regulated under the conditions of consent and the community can be reassured that as a State significant development this would occur. Monaro Rock would be required to provide a rehabilitation bond to be held in favour of the NSW Government over the life of the Project to ensure that sufficient funds are available to undertake rehabilitation.

Comment

Notwithstanding that permissibility is established by Clause 2.9(3) of the State Environmental Planning Policy (Resources and Energy) 2021, Council disagrees with the Proponent's assertion in the EIS that the proposal is consistent with the zone objectives.

For RU2 land, the proposal does not satisfactorily address the following zone objective:

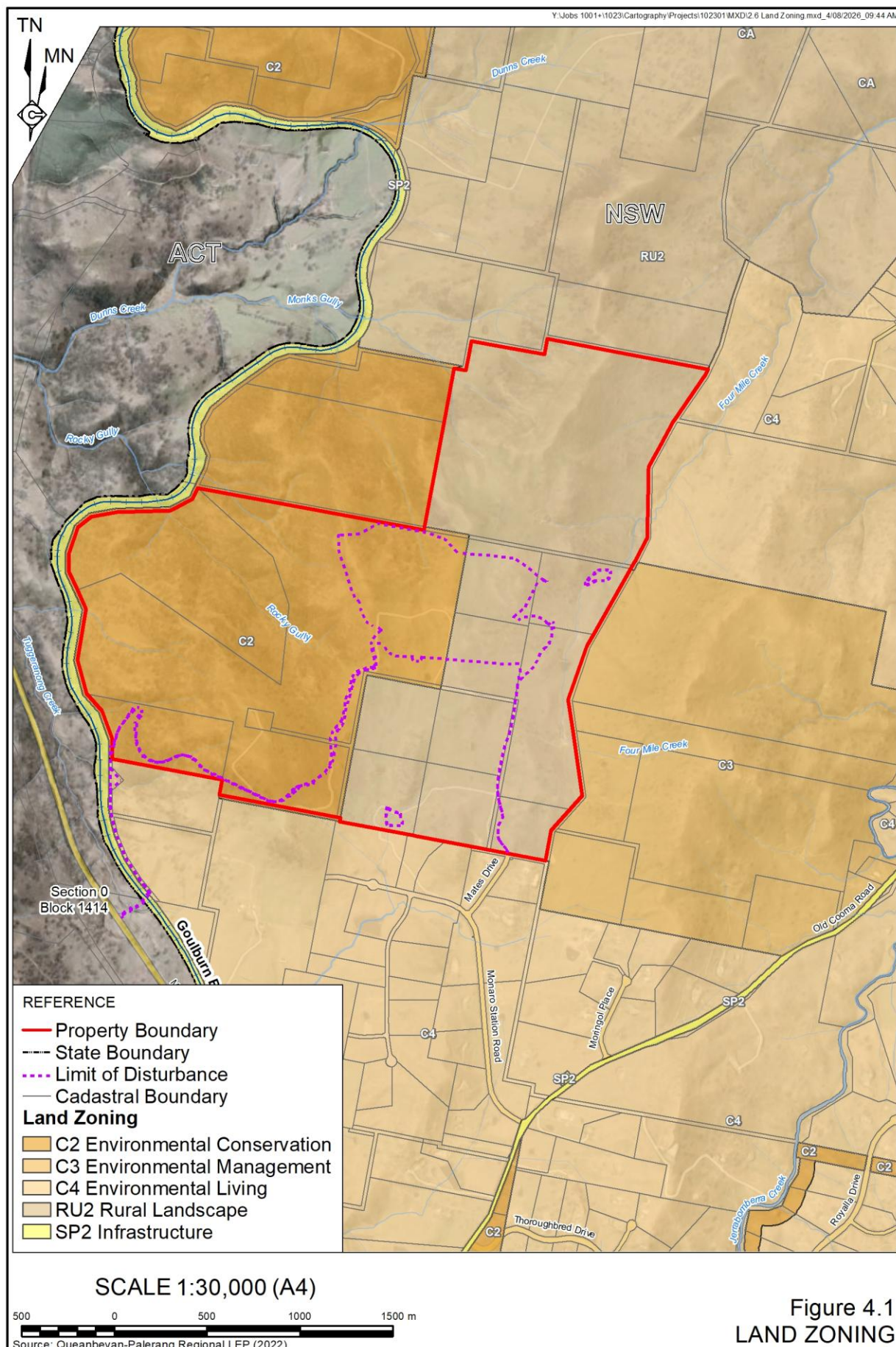
- To maintain the rural landscape character of the land.*

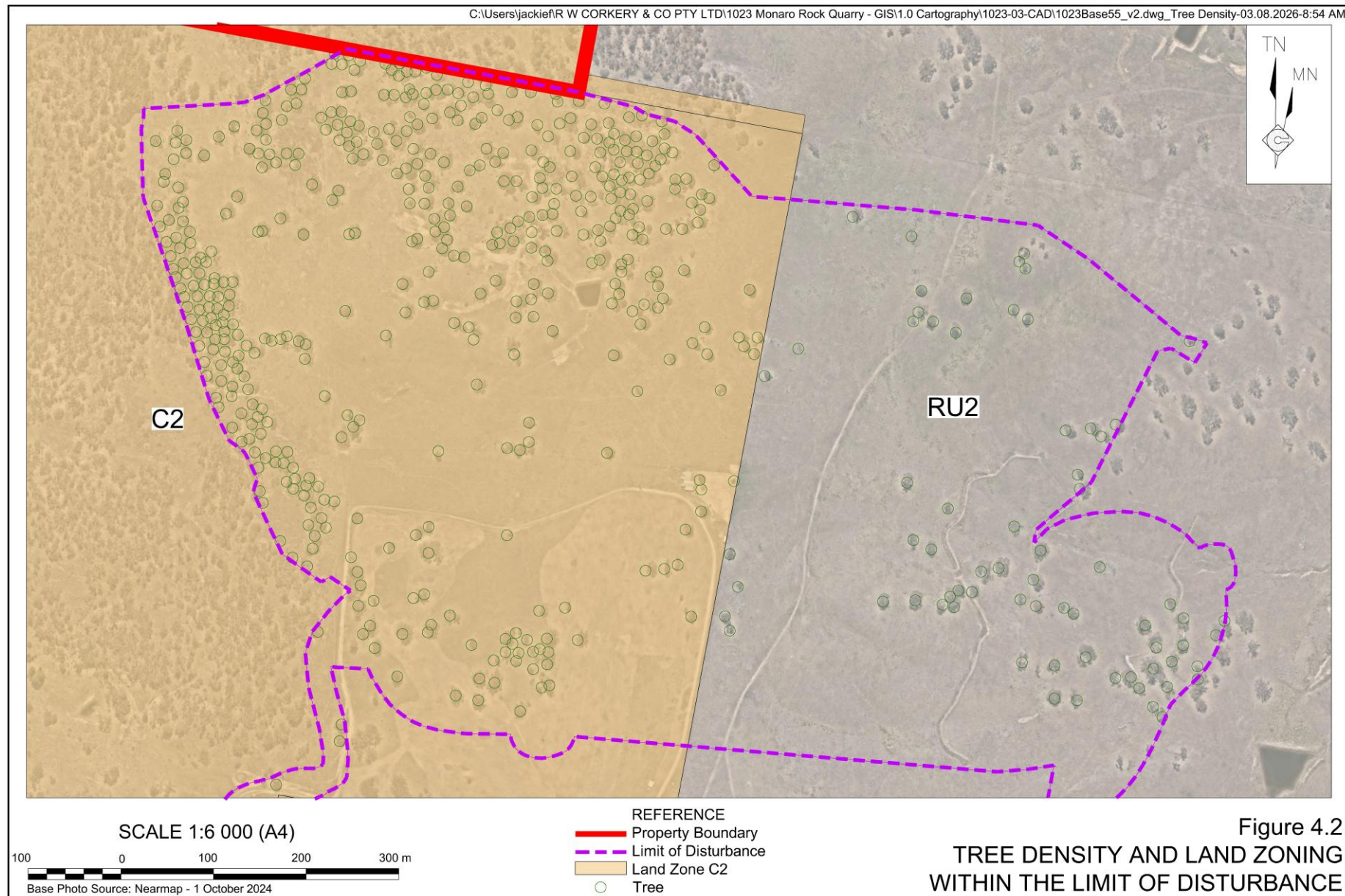
For C2 land, the proposal does not satisfactorily address the following zone objectives:

- To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values.*
- To prevent development that could destroy, damage or otherwise have an adverse effect on those values.*
- To encourage rehabilitation and regeneration of ecosystems.*
- To provide for a limited range of development and land use activities that support environmental conservation outcomes.*
- To identify and protect escarpment areas that enhance the visual amenity of Queanbeyan-Palerang Regional local government area and possess special aesthetic or conservational value.*
- To protect water quality by preventing inappropriate development within catchment areas.*

Response

Figure 4.1 displays the land zoning within the local area and **Figure 4.2** presents the zoning of the Project Site including a tree density analysis. The Project would be developed on land that is partially zoned Rural Landscape (RU2) and partially zoned Environmental Conservation (C2) as described in the *Queanbeyan-Palerang Local Environmental Plan 2022* (LEP). The Quarry Access Road would cross the railway corridor and land zoned Infrastructure (SP2). Surrounding the property, land is zoned Rural Landscape (RU2), Environmental Conservation (C2), Environmental Management (C3), and Environmental Living (C4).





Firstly, zoning guides permissibility by describing development that is permitted without consent, development that is permitted with development consent and prohibited development. The *State Environmental Planning Policy (Resources and Energy) 2021* (Resources and Energy SEPP) is the primary environmental planning instrument in NSW under which resources projects, such as the Project, are assessed. This includes establishing permissibility. It's relevant stated aims include to: "provide for the proper management and development of mineral, petroleum and extractive material resources for the purpose of promoting the social and economic welfare of the State" and to "facilitate the orderly and economic use and development of land containing mineral, petroleum and extractive material resources".

The Resources and Energy SEPP establishes planning controls through non-discretionary development standards that must be considered in development assessment for extractive industry development and that encourage ecologically sustainable development. Under Clause 2.9 of the Resources and Energy SEPP the permissibility of development in any zone in which agriculture is permissible is established as is the permissibility of certain activities (namely materials processing, concrete and asphalt production) that are co-located with extractive industry.

With permissibility established, there is still a necessary enquiry for the assessment authority to have regard to the relevant zoning objectives as contained in Part 2 of the LEP, when assessing the development application for the Project. It is important to consider the function of zoning in the planning framework for the State of NSW and the Queanbeyan-Palerang Local Government Area and how it reflects strategic planning intentions and guidance for the assessment of development applications. A comprehensive review of the zone objectives was presented in the EIS and is reproduced in **Table 4.1** which has been amended in light of Council's comments on the EIS.

Table 4.1
Queanbeyan-Palerang LEP Zone Objectives

Page 1 of 2

Objective	Consistency with the Project
Zone RU1 – Rural Landscape	
To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.	The Project would temporarily utilise land currently used for low-intensity grazing to extract a strategically important hard rock resource. The extraction would be staged and confined to a defined footprint, allowing for progressive rehabilitation. Post-quarrying, the land would be returned to a mix of grazing and conservation uses, with soil resources managed to support pasture re-establishment. This approach would maintain the long-term productivity of the land and enhance its value through improved infrastructure and landform stability.
To maintain the rural landscape character of the land.	The Project has been designed to integrate with the surrounding landscape, using natural topographic features such as Beatty Hill and Enchanted Hill to shield operations. A Visibility Barrier and tree screening would be constructed to obscure views of the quarry from nearby residences and public vantage points. Rehabilitation would include revegetation with native species and pasture grasses to restore the rural character of the site.
To provide for a range of compatible land uses, including extensive agriculture.	Extractive industry is permissible under the Resources and Energy SEPP on land where agriculture is permitted. The Project would coexist with surrounding agricultural uses and would not preclude future agricultural activities. The Infrastructure Area and Quarry Access Road have been sited to avoid fragmentation of agricultural land, and the final landform would support grazing and biodiversity conservation.
Zone C2 – Environmental Conservation	
To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values.	The Project has been designed to avoid areas of high-quality vegetation and habitat, including Box-Gum Woodland and Pink-tailed Legless Lizard habitat. The BDAR outcomes informed the final layout, and residual impacts would be offset.

Table 4.1 (Cont'd)
Queanbeyan-Palerang LEP Zone Objectives

Page 2 of 2

Objective	Consistency with the Project
Zone C2 – Environmental Conservation (Cont'd)	
To prevent development that could destroy, damage or otherwise have an adverse effect on those values.	The Project footprint was refined to exclude sensitive ecological areas and culturally significant Aboriginal sites, including a culturally modified ring tree. Construction and operational activities would be confined to the approved disturbance area, with clear delineation and limits established.
To encourage rehabilitation and regeneration of ecosystems.	Progressive rehabilitation would be undertaken throughout the life of the Project, with revegetation using native species. The Visibility Barrier would be stabilised and vegetated during construction, with extraction benches rehabilitated post-operations, to support habitat connectivity and landscape resilience.
To provide for a limited range of development and land use activities that support environmental conservation outcomes.	The Project includes offset strategies and the potential establishment of Biodiversity Stewardship Sites on adjacent land owned by the Applicant. These measures would contribute to long-term conservation outcomes and support regional biodiversity goals.
To identify and protect escarpment areas that enhance the visual amenity of Queanbeyan-Palerang Regional local government area and possess special aesthetic or conservational value.	The Project design incorporates visual screening and landform integration to protect scenic values. The upper benches of the Extraction Area have been designed to be shorter and vegetated earlier to reduce amenity impact.
To protect water quality by preventing inappropriate development within catchment areas.	Water management infrastructure has been designed to prevent pollution and manage runoff in accordance with best practice and in consultation with the EPA. Clean and dirty water systems would be separated, and sediment basins would be used to treat runoff before discharge or reuse. The discharge of water from the Project Site would be a last resort option in the water management strategy with the objective of utilising controlled discharge with managed water quality outcomes to avoid the risk of an uncontrolled discharge.
Zone SP2 – Infrastructure	
To provide for infrastructure and related uses.	The proposed Quarry Access Road and intersection with the Monaro Highway are consistent with this objective. These components would support safe and efficient transport of quarry products and integrate with existing infrastructure networks.
To prevent development that is not compatible with or that may detract from the provision of infrastructure.	The Project would enhance infrastructure provision by constructing a dedicated access road and intersection designed to accommodate heavy vehicle movements safely and efficiently. The design has been developed in consultation with Transport for NSW and ACT authorities to ensure compatibility and compliance.

While it is acknowledged that the Project would have unavoidable residual biodiversity impacts, the Project layout and staging was planned with the sensitivity and importance of remnant vegetation across the property in mind and is therefore considered to have been planned consistent with environmental conservation objectives. Section 2.8 of the EIS describes the consideration of alternatives for the Project and how areas of high biodiversity value were considered, alongside risks to community amenity. Any interpretation that vegetation clearing is not consistent with environmental conservation outcomes would require that no development that clears native vegetation may occur in the C2 Zone. This is clearly not the objective of the LEP or consistent with permissible development categories for the zone. While a consent authority must consider the objectives of the zone, it must do that in the context of the Project being permissible. Further to this, a review of the tree density in the vicinity of the extraction area for the Project was presented in the EIS and is reproduced as **Figure 4.2**. This clearly demonstrates how the development of the extraction area would avoid vegetation clearing within the more dense and better condition vegetation to the west. It is clear that part of the land zoned for Environmental Conservation has historically been used for agriculture and reflects the broadly established boundaries for zones, that are not validated by on-ground survey for accuracy.

When considering the development of the Quarry Access Road, the alternatives considered for the development demonstrate where multiple areas across the property were considered for access, and particularly the option to traverse Beatty Hill to the east as presented in **Figure 4.3** (which was subject to ecological and archaeological assessment and road design). While the current Quarry Access Road requires more vegetation clearing than some of the options considered, the decision on the current preference for access was informed by multiple factors (described in detail in Section 2.8 of the EIS), one of which was community amenity and outlook. A large portion of Beatty Hill has since been dedicated to biodiversity conservation through a Biodiversity Stewardship Site. This is a clear example of the Project being designed in a manner which is directly responsive to the relevant zoning objectives.

The Applicant has also considered the zoning and land use objectives for land surrounding the Project, noting that the closest private residence is 1.5km from the Project Site.

- To the north of the Project Site, land is zoned for Rural Landscape (RU2) and is currently used for minor sheep grazing. Impacts to the ongoing use of this land are not expected to occur.
- Land to the west of the Project Site is zoned for Environmental Conservation (C2). The risk of indirect impacts from the operation to remnant vegetation and habitat has been considered in assessment and risks of impact accounted for in the biodiversity offsetting obligations of the Project. The Project is not expected to significantly impact biodiversity values to the west of the operating areas.
- Land to the east of the Project Site is zoned for Environmental Management (C3) which is consistent with the Biodiversity Stewardship Site that has been established on Beatty Hill. The Project is not expected to limit the achievement of biodiversity outcomes for the stewardship site.
- Land to the northeast and south of the Project Site is zoned for Environmental Living (C4). The Visual Impact Assessment (RWC, 2025) demonstrates that views of operating areas would be limited and specific mitigation measures including a Visibility Barrier, tree screening, a 3m fence along the Quarry Access Road and specific protocols for the development of upper benches of the Extraction Area would mitigate the potential for views of the Project to occur. In addition, the amenity of residents would be maintained, as demonstrated in the outcomes of assessment on noise, blasting, air quality and water resources. The Project would not represent an impediment to the ongoing use and enjoyment of rural residential land in the vicinity of the Project Site.

Considering the above, Monaro Rock believes that the Project has been planned and would be implemented in a manner which is consistent with the land use objectives specified for the land zones that apply to the property. As a guide to strategic land use planning decisions, the land zoning has been considered in the rejection of alternatives to the current design and in steps taken to avoid vegetation clearing, where possible, and in planning for management measures that would be applied for the Project to mitigate environmental risks. The fact remains that the Project is permissible with development consent in this location, and the consideration of land zoning and land use objectives is evident in the Project design and the mitigation and management proposed that support the conclusion that significant impacts to the local environmental setting are not expected to occur.

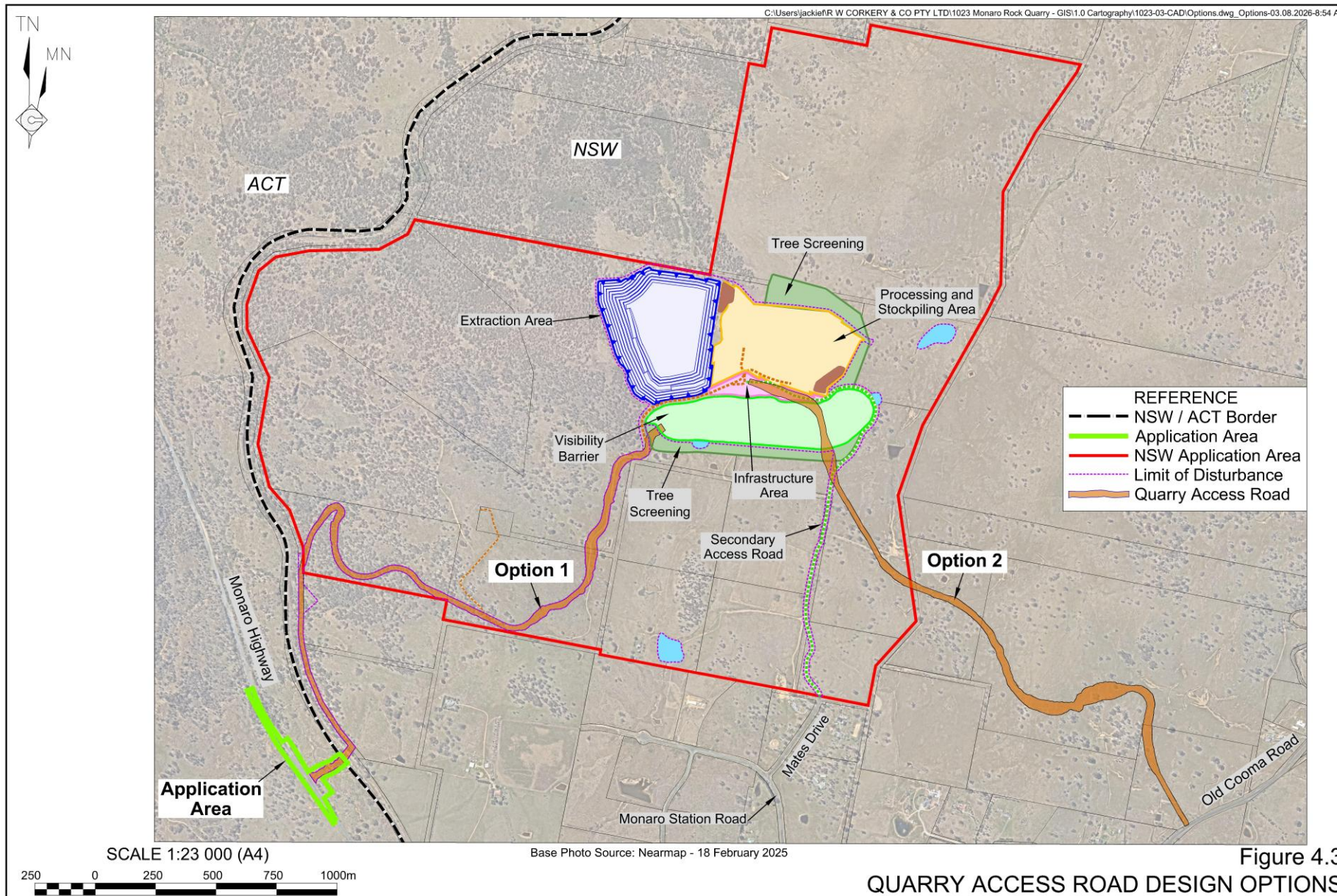


Figure 4.3
QUARRY ACCESS ROAD DESIGN OPTIONS

Comment

The Biodiversity Development Assessment Report (included as Appendix G to the EIS) notes the Project has been assessed as having serious and irreversible impacts on listed plant communities, and listed plant and animal species; causing fragmentation and potential impacts on adjoining and nearby reserves & TSRs.

213ha of the 557ha site is identified as high quality critically endangered Box Gum Grassy Woodland BGGW (EPBC Act). The Project would require clearing 77.03ha of native vegetation including 22.44ha of BGGW and the impacts on this plant community are described as serious and irreversible. Most of this endangered ecological community has disappeared, with less than five percent of pre-European extent remaining, raising questions about the suitability and effectiveness of offsetting any further loss.

Serious and irreversible impacts would also occur to Pale Pomaderris ecological community.

Habitat suitable for listed fauna and flora native species would be cleared. A number of vulnerable, threatened and endangered plant and animal species were recorded at the project site: Silky Swainson-pea; Pale Pomaderris, Small purple-pea; Hoary sunray; Dusky wood swallow; Gang gang cockatoo; Speckled warbler; Varied Sittella; Scarlet Robin; Flame Robin; Key's Matchstick Grasshopper; and the Latham's snipe. Habitat suitable for the pink-tailed legless lizard was also recorded. These species would be exposed to habitat loss as well as disturbance from activities for which consent is sought.

The risk of adverse impacts beyond direct clearing include fragmentation to corridors linking neighbouring nature reserves (Melrose, Mt Rob Roy, Royalla Swainsona, Wandiyali and Havelock) and Travelling Stock Reserves (Tuggeranong, Royalla). These reserves form part of an east-west corridor that links the Great Eastern Ranges to the Murrumbidgee River Corridor.

Other indirect impacts of concern include noise, edge effects and dust on retained and adjacent areas to the worked site area. These range from a 10% reduction in biodiversity value within 100m of the extraction, processing and stockpiling areas to a 20% reduction in biodiversity value within 50 metres of these areas.

Response

Matters such as biodiversity corridors, and indirect impacts were comprehensively addressed in the BDAR for the Project prepared by Capital Ecology (2026). The BDAR has been updated in response to requests from CPHR for further assessment, however it should be noted that while the BDAR provides an assessment of potential SAI outcomes, the conclusion on SAI is the responsibility of the regulatory authority. In this case CPHR concluded that the Project did not represent a significant risk to Box-gum Woodland but has asked for further consideration of how impacts to the Pale Pomaderris and Small Purple-pea may be avoided or managed.

A species-specific management plan has been developed for the Small Purple-pea to guide management of risks of indirect impacts to the species. Regardless, it is considered that the risks of impact to threatened species and ecosystems within the Project Site has been avoided to the greatest extent practical and ongoing risks would be mitigated and managed through operating protocols given force through conditions of development consent.

The subject land supports 218.11ha of Box-Gum Woodland across vegetation zones of differing condition. The Project would directly affect 22.44 ha, comprising approximately 10% of the Box-Gum Woodland on the subject land, 4% within the assessed immediate locality and 0.009% of its estimated NSW extent. Approximately 195.67ha would remain on the subject land. The Project footprint has been refined to avoid higher-quality vegetation where practicable, including additional Box-Gum Woodland, Pale Pomaderris habitat and higher-quality Gang-gang Cockatoo foraging habitat.

The BDAR concludes that sufficient connected habitat would remain to maintain the viability of the retained population and that the Project is unlikely to result in an SAIL to Pale Pomaderris. The Project would affect two Pale Pomaderris plants, while more than 99% of the estimated plants and approximately 78% of mapped habitat on the subject land would be retained.

Landscape connectivity was specifically assessed in Section 3.2.3.2 of the BDAR. Substantial connected habitat would remain to the north, east and west of the development footprint, and the average minimum distance between Box-Gum Woodland patches would remain unchanged at 39.13m. The BDAR therefore concludes that the retained vegetation would remain sufficient to support ecological function and fauna movement through the locality.

The recorded Hoary Sunray, Latham's Snipe habitat and occupied Pink-tailed Legless Lizard habitat would be largely avoided. Residual impacts on other threatened species and their habitat have been quantified through the BAM and generate corresponding ecosystem or species-credit obligations.

Comment

The Aboriginal Cultural Heritage and Archaeological Report (included as Appendix H to the EIS) identifies 31 Aboriginal items consisting of 16 isolated finds and artefact scatters, two culturally modified trees (considered rare), seven artefact scatters and six areas of potential archaeological deposits (PAD) within the survey area. Of these, 19 sites lie within the project site and would be impacted by the project. Ten sites are within the direct vicinity of the works (within 20 metres) and are at risk of accidental harm.

The disturbance of the natural landscape in which these artefacts sit and the removal of some scatters for investigation exacerbates the disturbance of Aboriginal people's cultural heritage that has occurred since European occupation of the land. While artefacts removed for investigation will be returned, the transmutation of the forest and woodland environment into an industrial landscape undermines ecological and cultural integrity of Country which Traditional Custodians have occupied and cared for, for thousands of years. Rehabilitation, whether it occurs in 35 or 100 years, likely offers little consolation.

Response

The Applicant acknowledges that Aboriginal cultural heritage values extend beyond the physical presence of artefacts and include broader cultural connection to Country. These values have been considered in the ACHAR, which was prepared in consultation with Registered Aboriginal Parties (RAPs) in accordance with NSW Heritage guidelines. The assessment included archaeological survey, significance assessment and extensive consultation with Aboriginal stakeholders and has subsequently been updated to incorporate the outcomes of a program of subsurface testing

Following completion of the original assessment, the Project was redesigned to avoid impacts to culturally significant sites identified through consultation with RAPs. In particular, the two high-significance culturally modified trees (MQ8 and MQ9), have been excluded from the development footprint and would be protected by exclusionary fencing during construction.

The updated ACHAR identifies 21 Aboriginal heritage sites within the revised Project Site, with impacts to 19 sites considered unavoidable. Subsurface investigations undertaken in 2026 confirmed that the affected potential archaeological deposits comprise low-density dispersed artefact deposits of low archaeological significance. Based on the significance assessment, the ACHAR concludes that there are no heritage items of high significance that would preclude the Project proceeding.

Where impacts cannot reasonably be avoided, the Project incorporates a comprehensive suite of mitigation measures, including salvage excavation and artefact collection, return of recovered artefacts to Country under a RAP-endorsed protocol, protection of retained heritage sites through fenced and buffered exclusion zones, preparation and implementation of an Aboriginal Cultural Heritage Management Plan and Unexpected Finds Protocol.

While the ACHAR recognises that disturbance of Aboriginal cultural heritage cannot be entirely avoided, the impact assessment concludes that the revised project design, avoidance measures applied and comprehensive management framework represent an appropriate and proportionate approach to minimising impacts on Aboriginal cultural heritage, consistent with the requirements for State significant development under the *Environmental Planning and Assessment Act 1979*.

Comment

According to the Road Transport Assessment (Included as Appendix I to the EIS), up to 500 heavy vehicle movements will occur daily, with half of them being fully laden. Travelling during a 13-hour our window, six days a week. That's an average of 38 vehicles an hour, or almost one vehicle every two minutes. Notwithstanding that any appropriate alteration to the hours of operation to mitigate noise impact to the community would increase this hourly rate, the typical hourly truck count establishes an average dispatch rate of one fully laden truck every 2-3 minutes. The addition of fully laden truck to the Monaro highway at this rate will result in dangerous conditions for commuters.

This number of heavy vehicles presents a risk to other road users, particularly during morning and evening commuter periods and during winter when days are shorter and fog more likely.

The proposed operational vehicle access is via a new access road to the Monaro Highway and is subject to ACT Government approval. Given the safety issues arising from a high number of heavy vehicles entering the single carriageway highway, in many cases turning across the traffic, there is a real risk that approval will not be granted. This would leave the proponent seeking access either via Old Cooma Road, imposing significant social, economic and environmental impacts on residents living along Old Cooma Road and potentially through Queanbeyan residential areas to access the highway in addition to a high economic cost to QPRC, and via Beatty Hill, which is reserved under Biodiversity Stewardship Agreement.

Neither of these options is desirable. Old Cooma Road is not designed to accommodate that volume and significant direct residential driveway/home access exists on this route with substantial residential traffic entering the route from Googong Township intersections.

Under the proposed operations, heavy vehicle traffic movements would start from 5am on weekdays to 6pm, and from 5am on Saturdays. 5am is not an appropriate time to commence such significant quantities of heavy vehicle movements in such close proximity to residential development. Council also notes that the commencement of operations from 5am in winter will require lighting of the work area potentially leading to additional impacts which have not been assessed.

Response

Monaro Rock has consulted with the ACT Government on the proposed access and while development consent for the short section of road and the intersection has not been secured, in principle agreement to the design and traffic outcomes for the Project has been provided. This feedback is subject to further assessment for any development application, however it is sufficient for Monaro Rock to proceed with the application in NSW with confidence.

The Road Transport Assessment (TTPP, 2026) assessed the traffic implications of the Project in detail, using a maximum operational scenario of approximately 500 total heavy vehicle movements per day. The assessment concluded that the dedicated quarry access intersection with the Monaro Highway would continue to operate at acceptable Levels of Service and with acceptable delays under maximum production conditions. The assessment also confirms that the proposed intersection layout provides appropriate sight distance and turning facilities for the design vehicles, with the intersection specifically designed to convey traffic safely.

Importantly, operational quarry haulage has been designed to occur exclusively via the new dedicated access road and Monaro Highway intersection. The proposed access arrangement has been developed in consultation with the former Transport Canberra and City Services (now Community and Environment Directorate) and includes concept intersection design, SIDRA operational analysis, road safety assessment and mitigation measures to demonstrate that the proposed access can safely accommodate quarry traffic. The use of Old Cooma Road for quarry haulage is not proposed unless customers must be reached by Old Cooma Road. In these instances, vehicles would turn left at the Monaro Highway and then left on to Old Cooma Road before travelling to their destination. All operational heavy vehicles would access the Project Site directly from the Monaro Highway and the Quarry Access Road.

The Social Impact Assessment also considered amenity impacts associated with traffic, noise and changes in the local environment and identified a range of mitigation measures and management commitments to minimise impacts on nearby residents. Lighting requirements associated with early morning operations would be designed and managed in accordance with relevant Australian Standards and environmental management measures to minimise off-site light spill and impacts on surrounding receivers.

Comment

According to the Groundwater Impact Assessment (included as Appendix L to the EIS) Quarry operations intend to seek permission to draw a maximum of 42.4 million litres per year of groundwater. The estimated total groundwater take over the project life is 916 megalitres, noting this assessment report refers to a 30-year project life, not 35 years as referenced in other documentation.

There are 70 registered groundwater bores to the north, east and south of the project site, 38 of them known to be in use for households, one community water supply, two used for irrigation and one for livestock.

Two bores within the predicted impact zone of the project have been identified as most likely to experience drawdown as a result of quarry operation. These bores are used for irrigation, and for stock and domestic supply. Refer Table 11.

At stage 4 of the project, the quarrying operations would intersect with the groundwater table, resulting in the potential impact and take of groundwater. The maximum excavated depth below the groundwater table is 50 metres.

The assessment identifies a likely risk of quarrying operations at this stage causing a drop in resource availability for private bore holders. This presents an unacceptable risk to water security given bore water use by households, for irrigation and livestock, as well as community use, and in view of the current trajectory of climate change and associated likely negative feedback loops on water resources.

At the end of the project life, the quarry pit is expected to fill with rainwater, runoff and groundwater inflows. Groundwater is expected to flow into the pit lake from the east and discharge to the west. It's not clear from the assessment report what impacts that might have on groundwater to the west of the project site.

In relation to modelling conditions and assumptions, groundwater monitoring was undertaken over 28 months between September 2021 and January 2024, during a relatively wet period. Therefore, it might not accurately reflect the range of climate conditions influencing groundwater inflows and Council considers that this data is unable to be determined as representative of actual groundwater conditions.

The assessment report also notes that the impact of the Royalla Fault on the groundwater system is unknown, but that the fault is likely to influence the groundwater impacts of the project. This creates a degree of uncertainty in the modelling that the assessment has relied upon, reducing confidence in the assessment conclusions.

Further, the peer review of the numerical groundwater modelling at Appendix D states that modelling was based on two average climate conditions. Refer section 2.2.9. This introduces a further element of uncertainty in the groundwater impact assessment given current climate change forecasts and the trajectory of recent warming.

Further to the comments made under the "Groundwater Impact" and "Surface Water Impact" headings, the proposed groundwater draw of up to 42.4 million litres of water a year is quite significant. Couple with a penetration to 50m below the water table raises concern that the ultimate effect of these operations will be the permanent lowering of the water table directly impacting the ability of residents and rural properties to access this critical resource.

Response

The Groundwater Impact Assessment (GIA – The Hydrogeologist, 2025) assessed the predicted groundwater take, impacts to groundwater users and post-closure groundwater conditions in accordance with the Guidelines for Groundwater Documentation for State Significant Development Projects (DPE, 2022), the Minimum Groundwater Modelling Requirements for Major Projects in NSW and the *NSW Aquifer Interference Policy*. The proposed maximum

groundwater take of 42.4ML/year would only occur once quarrying intersects the groundwater table. Monaro Rock has secured the necessary Water Access Licence to account for this take of water, signifying that the take of groundwater would be consistent with water allocations for the aquifer and would be available. Numerical groundwater modelling predicts that impacts would be localised, with only one existing bores expected to exceed the NSW Aquifer Interference Policy minimal impact criteria. Where these criteria are exceeded, make-good provisions would apply to ensure that affected groundwater users do not experience a loss of water supply. The assessment does not conclude that the Project would result in a permanent regional lowering of the groundwater table or widespread impacts to surrounding groundwater users. Instead, post-closure modelling predicts groundwater levels would progressively recover as the final void fills and a new long-term equilibrium is established.

The GIA determined that although approximately 70 registered bores occur within 3km of the Project, modelling predicts that only one existing bores may experience drawdown exceeding the Aquifer Interference Policy minimal impact criteria. In accordance with the Policy, where these criteria are exceeded, make-good provisions would apply to ensure the continued availability of water to affected users. Unfortunately, the owners of these bores have not provided access to determine the condition and depth of water in the existing bores. The assessment also models post-closure conditions, including formation of a pit lake and the re-establishment of groundwater flow, and concludes that no significant adverse impacts to surrounding groundwater users or the regional groundwater regime are expected.

While the site-specific monitoring program comprised approximately 28 months of groundwater data, the assessment supplements this with records from the SILO dataset spanning 1900 to 2024 to characterise historical variability, together with a conceptual hydrogeological model, numerical groundwater modelling, uncertainty analysis and an independent peer review. The reference to a 30-year modelling period reflects a conservative assessment of a Project with an anticipated operating life of 30 to 35 years. Similarly, the influence of the Royalla Fault is recognised within the conceptual model and incorporated into the numerical modelling and uncertainty analysis. The independent peer review considered the modelling methodology and assumptions, including the adopted climate scenarios, and did not identify any deficiencies that would invalidate the assessment conclusions.

Accordingly, the GIA concludes that groundwater impacts are localised, predictable and capable of being effectively managed through licensing, monitoring and the proposed mitigation measures.

Comment

In relation to runoff & discharge discussed in the Surface Water Management Report (included as Appendix K to the EIS), Guises Creek & Tuggeranong Creek are noted as receiving waterway though there is no mention of Jerrabomberra Creek which is also in the direct vicinity of the project. Presumably topography may prevent runoff from reaching Jerrabomberra Creek, but this not substantiated by the report.

Council questions what climate change projections for surface water and rainfall have been relied upon for the purposes of the management report? As previously discussed under the "Groundwater Impact" heading above, it is noted that the Project's reliance on groundwater for quarry operations could affect water security for residential & rural properties, particularly in dry years. This will hold true for the use, and affectation, of surface water also. Accordingly, it

is imperative that suitable climate change projection models are used to determine the probable impact to water access. In the absence of the application of suitable climate models, Council considers the risk to water access unable to be assessed.

Response

The Surface Water Management Report (SWMR) prepared by SEEC (2026) identifies the receiving waters for the Project based on the site's topography and local catchments. As described in Section 2.2 of the SWMR, surface water from the Project drains to Four Mile Creek which flows north to join Jerrabomberra Creek.

The Surface Water Management Report does not rely solely on recent rainfall observations, but uses long-term climate records obtained from the SILO database to undertake continuous simulation water balance modelling. The assessment evaluates site performance under various conditions consistent with the SEARs, and adopts conservative operational assumptions regarding water demands, groundwater inflows and controlled discharge. The updated modelling demonstrates that the Project has a high level of water reliability while maintaining sediment basin capacity. The report ultimately concludes that the proposed water management system is capable of appropriately managing surface water quantity and quality throughout the life of the Project.

Comment

Further, no assurance is provided that there is enough capacity available in the electricity grid for this development. The EIS states that only that connection enquiries have been made. Council notes the possibility that an oversubscribed service could result in brownouts and damage to equipment relied upon by residents and rural properties for water security, such as pumps and bores.

Response

The availability of electrical network capacity is a matter for the relevant electricity network provider and forms part of the detailed design and connection approval process. As noted in the EIS, preliminary connection enquiries have been undertaken and a formal connection agreement would be established prior to operation. There is no evidence that the Project would result in brownouts or adversely affect electricity supply to surrounding properties. Any required network upgrades would be identified and addressed through the network provider's connection assessment process before the Project could connect to the grid.

Comment

Council raises concern over the validity of the economic need assessment and, in particular, questions the data sources, rationale and rigour used in the assessment to support economic need case. For example:

- 1. How has the remaining estimate of resource at existing nearby quarries been determined? Has this data simply been extrapolated from other publicly available EIS documents? Or has there been a more rigorous process that actually assesses each other quarry at a common, and recent, moment in time?*
- 2. Has this assessment considered the implications for Williamsdale quarry developing a known resource of significant quantity?*

3. *Has the assessment considered that this particular hard rock resource is not unique to this site, and actually extends south of Royalla? Accordingly, has there been any assessment as to whether other sites may be more suitable, or at least less impactful for material extraction?*
4. *What is the rationale to select the medium population projection series when assessing potential future product demand?*

Further to the above examples of deficiency in the rigor of economic assessment, Council questions how valid the contention is, that the project is needed to keep housing and infrastructure projects from being higher than they would be without the project? It is difficult to test this assertion as it is founded on several assumptions which might not prove to be well founded (e.g. pace of growth, demand for housing, government investment in infrastructure, other potential quarry operations), and the fact that concrete is only one of the costs of housing, and not the most significant cost.

The economic benefit considered in the project need does not factor the degradation of economic value to the community insofar as unrealised value of future land releases or a direct impact to cumulative property values.

Negative economic impact to Council is realised through the net reduction in land values, the cost of any future rehabilitation and through degradation of council services and infrastructure despite the terms of any potential Voluntary Planning Agreement.

Council is aware that the existing quarries are currently under-producing and have room to increase production and expand before a new quarry is actually needed and notes any new jobs created by the quarry may adversely impact on the operations of existing quarrying employers. This is not consistent with the premise that a material under supply exists or is soon to exist.

The proposal brings very little economic value to the region except for profits for the quarry ownership. Few local jobs will be created, most employees will come from out of the area and the money back into the community is extremely limited. The proposed financial benefit to council of a few cents per tonne of output is insultingly small given the horrendously negative impact the proposal would have on the whole council area.

Response

The Economic Assessment (Gillespie, 2025) addresses the significance of the resource by relying on information presented in the Assessment of Economic Need prepared by Ecoroc Pty Ltd (2025). The assessment can only rely on the data available and provides an indication of demand forces that support development of a new quarry in this location. The supply analysis is based on the remaining reserves currently approved for extraction at the four existing hard-rock quarries within 30km of central Canberra, assessed against projected regional demand over a 26-year period. It does not assume that all geological resources identified at existing quarries are available for extraction. Section 7.3 and Section 8.5 of Ecoroc Pty Ltd (2025) expressly recognises that the Williamsdale Quarry may contain additional resources which, if approved, would reduce the forecast supply shortfall.

The assessment also recognises that while suitable rock occurs elsewhere, its viability as an alternative depends on resource quality, land availability, environmental constraints, approval status, access and haulage distances. The medium population projection provides the most measured planning scenario for estimating demand. A sensitivity analysis considers the sensitivity of outcomes should some assumptions not match outcomes and the demand argument

remains strong. The analysis supports the anecdotal evidence that Monaro Rock is receiving from within the construction materials industry that supply sources are being tightly managed and that price drivers support the inclusion of an additional source to encourage competition.

The Economic Assessment applies a cost-benefit analysis consistent with the NSW economic assessment guidelines, including capital, operating, transport, water licensing, environmental management, biodiversity offset, road construction, rehabilitation and decommissioning costs. Potential environmental, social and cultural impacts including infrastructure costs and displacement of other industries are identified as potential economic costs, with residual effects assessed having regard to the conclusions and mitigation measures of the specialist studies. The assessment estimates 30 direct jobs, of which approximately 12 would be filled by existing Queanbeyan-Palerang residents, approximately \$9.5 million per year in local non-labour expenditure, and broader direct and flow-on effects of approximately 53 regional jobs and \$25 million in annual value-added.

4.1.7 Heritage NSW

Heritage NSW's submission raised issues relating to review of the Aboriginal cultural heritage assessment in regard to addressing the SEARs. The comments seek clarification on the identification, extent, and significance of heritage sites, as well as more rigorous assessment of potential impacts. The following paraphrases the submission of Heritage NSW in relation to these issues and provides a formal response.

Comment

1. In accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW 2010; Consultation Guidelines), please provide all consultation records (including all letters and email correspondence) undertaken for the project. Specifically, please provide evidence that emails/letters have been issued to all project RAPs.

Response

The consultation log relating to the preparation of the ACHAR is provided in Appendix 1 of that report (Past Traces, 2026 – **Appendix 5**) and outlines the timing and nature of consultation for the preparation of the report. The detailed records have been treated as confidential by Past Traces and will be provided separately to Heritage NSW as evidence of the activities occurring.

Comment

2. Please provide an updated Aboriginal Heritage Information Management Systems (AHIMS) search. AHIMS searches are only valid for a period of 12 months.

Response

An AHIMS search was conducted on 2 June 2026 and has been included as Appendix A.2 of the updated ACHAR.

Comment

3. Please ensure that all sites identified during survey and assessment be registered on AHIMS to ensure the area is managed appropriately beyond the lifetime of the current proposal.

Response

All sites recorded during survey have been registered on AHIMS. AHIMS reference numbers for each site can be found in Table 4 of the ACHAR (Past Traces, 2026).

Comment

4...provide detailed and thorough mapping which includes all survey track logs, including for the two smaller project areas adjacent to the main boundary.

5.....ensure that a sketch of the tree and scar that includes the location and shape of scar, location of features (...) and overall condition of the tree and scar are included in the site recording form.

Response

Pedestrian transect logs have been produced in Figure 9 of the ACHAR (Past Traces, 2026). The site recording form has been uploaded to the NSW Heritage database, complete with hand drawn sketch as specified.

Comment

6. Please update Section 5.5 Field Survey Results and Section 6.2 Significance Assessment to include only sites identified within the current project area. Details of sites identified and recorded outside the current project area or in previous project boundaries should be used to inform the predictive model, with detailed recordings included as appendices to the current ACHAR.

Response

Sections 5.5 and 7.2 of the ACHAR (Past Traces, 2026) have been updated to include only sites within the project area. Sites identified and recorded outside the current project area are detailed in Appendix 3 of the ACHAR and have been used to confirm the accuracy of the predictive model for the region.

Comment

7. Please describe the nature of potential impacts to PAD MQ9 and:

If PAD MQ9 is at risk of impact, the project area should be amended to include this location of potential indirect impact and appropriate assessment and mitigation measures developed; or

If PAD MQ9 has the potential to continue into the current project area, the PAD boundary should be amended accordingly and subject to subsurface testing to determine its extent.

Response

MQ9 is located on a creek flat of the southwest area of the proposed extraction area. The ACHAR has been amended to specify that no impacts will occur to MQ9 due to redesign to avoid the scarred tree. MQ9 is in proximity to an area proposed for tree screening. To mitigate risk to MQ9 during works, barrier fencing with a buffer of 10m must be installed prior to any works in vicinity occurring, as per section 9.1 of the ACHAR. Barrier fencing may be removed following completion of works. This site would be further protected from any accidental impacts by no harm areas to be marked on all project mapping and heritage induction training for all personnel. As a mature remnant tree, MQ9 is already supported by an established root system. The proposed tree screen is not expected to result in substantial root competition or ground disturbance in the vicinity of the scarred tree.

Comment

8. Please clarify if site MQ2 PAD is directly associated with isolated artefact site MQ2, as these are indicated as spatially separated on Figure 12a.

Response

Section 5.5.2 of the ACHAR (Past Traces, 2026) has been updated to clarify that the MQ2 site is associated with the MQ2 PAD.

Comment

9. Please provide further discussion regarding the cluster of isolated artefact sites and localised areas of Potential Archaeological Deposit (PAD) (MQ2 PAD, MQ2, MQ5, MQ4, MQ26 PAD) indicated on figure 12a. In particular, please provide discussion to determine if these sites would be considered as a single area of open scatter and PAD.

Response

Section 6.5 of the ACHAR (Past Traces, 2026) details that the subsurface testing programme indicated that artefactual material is sparsely and discontinuously distributed across all tested areas of PAD, with no discrete concentrations or areas of elevated density identified.

Comment

10. Please provide further discussion as to why some sites were designated as PADs in certain landforms while others were not. For example, MQ13 and MQ2 are identified as surface artefact sites with PAD, while other surface artefact sites in the same landform are not identified as also containing PAD.

Response

Section 5.5 of the ACHAR (Past Traces, 2026) has been amended to include a brief description under each site heading regarding the subsurface potential for artefacts, or lack thereof.

Comment

11. Please clarify the potential impact and proposed mitigation for modified tree MQ9 . Table 9 outlines the MQ9 will be subject to total direct harm, however elsewhere in the ACHAR it is indicated that the modified tree sites will be fenced and avoided due to redesign.

12. Please clarify if the visibility barrier to be constructed near MQ9 is a tree barrier, fencing, or both. If a tree barrier, please clarify how potential root growth may impact MQ9.

Response

The ACHAR has been amended to specify that no impacts will occur to MQ9 due to redesign to avoid the scarred tree. The visibility barrier is an earthen barrier that would be revegetated. This barrier is not expected to result in substantial root competition in the vicinity of the scarred tree.

Comment

13. Please provide an impact assessment for potential vibration impacts due to proposed extraction close to modified tree MQ8.

Response

There are no established guidelines or assessment frameworks that define vibrational limits for vegetation. Considerations relevant to vegetation, including noise, dust, and edge effects, have been evaluated within the Noise and Vibration Impact Assessment (Octave, 2026) and BDAR (Capital Ecology, 2026) and incorporated into those assessments. Accordingly, the 10m buffer adopted in the BDAR, aligned with an assumed 30% impact within 50m, provides a conservative basis for impact avoidance. On this basis, no measurable or significant impact to MQ8 is expected.

Comment

14. Heritage NSW recommends that all assessment should be undertaken prior to the approval of impacts to Aboriginal cultural heritage. Without adequate and complete assessment (in this case subsurface testing) to establish the cultural significance it cannot be demonstrated that more places of significance, or places which may further enhance the significance of the known Aboriginal cultural heritage in the area will not be found.

It is recommended that the proposed program of archaeological test excavation of the PADs identified in the ACHAR be undertaken in accordance with a detailed methodology developed in consultation with RAPs prior to project approval to allow for adequate consideration and mitigation of any Aboriginal objects, sites and/or values.

Test excavations to determine the nature of the subsurface archaeological materials and the potential extent of PADs will provide greater certainty on the areas that should be conserved and those locations that require additional management and mitigation prior to any approval for their impact.

Response

Subsurface testing was undertaken to determine the presence, significance and extent of any archaeological subsurface deposit which may be present within the identified areas of PAD. Further details regarding the aims and results of the subsurface testing programme can be found in Section 6 of the ACHAR (Past Traces, 2026) and as described in Section 3.4.4.

Comment

Section 8 Management and Mitigation should be updated to include a requirement for an Aboriginal Cultural Heritage Management Plan (ACHMP) (...)

Response

Section 9.2 Management Recommendations has been updated to recommend the development of an ACHMP to the requirements specified by Heritage NSW.

Comment

Please update Appendix 4 to reflect NSW, not Australian Capital Territory (ACT) requirements.

Response

The Unexpected Finds Protocol is now presented as Appendix 6 of the ACHAR and has been updated to reflect NSW requirements.

4.1.8 ACT Government – City and Environment Directorate

Comment

The design and construction of any sedimentation basins must minimise the potential for causing any insanitary condition (local mosquito nuisance) under the Public Health Act 1997. The applicant is advised to contact the Health Protection Service for further information regarding this issue.

Response

Sediment basins and associated water management infrastructure would be designed, constructed and operated in accordance with the Surface Water Management Report and the Erosion and Sediment Control Plan (SEEC, 2026). The objectives of the proposed water management system include the following.

- Separation of clean water from externally draining catchments and dirty water from internally draining catchments.
- Efficient recovery and use of natural water resources to minimise external water demand;
- Effective management of available storage volumes that minimises the risk of uncontrolled discharge to receiving environments; and
- Effective water quality management strategies that limit the need for controlled discharge or uncontrolled discharge of impacted water to receiving environments.

SEEC (2026) presents a number of design controls and mitigation measures that would support the achievement of these objectives and ensure that water quality is managed appropriately. The Applicant would be comfortable to consult with the ACT Government during the preparation of a Water Management Plan to ensure that the proposed measures are consistent with requirements of the ACT Health Protection Service.

Comment

The topography will result in overland flow paths generally sloping towards the ACT. Appropriate erosion and sediment control measures must be in place to keep all development sediment, mud and silt confined to the quarry site / access road and not flow toward the ACT / NSW border.

Response

The Project has been designed to capture and manage runoff generated within disturbed areas through a system of clean water diversion drains and sediment basins. The highest priority for the management of detained water would be to avoid the occurrence of uncontrolled discharge of sediment-laden runoff from the Project Site, including towards the ACT/NSW border. Section 3.3.3 describes the outcomes of an update to the Surface Water Management Report and the Erosion and Sediment Control Plan (SEEC, 2026). Importantly, the approach to management of stormwater runoff has been modified to increase storm storage and limit the potential for water discharge.

Comment

The ACT Environment Protection Authority (EPA) is satisfied that their previous comments have been adequately addressed in the EIS and supplementary study reports. Notably, the supplementary reports 'Air Quality Impact Assessment' and 'Noise and Vibration Impact Assessment' both include the ACT within the study area/spatial extent of the project. However, EPA advised that the EIS requires more detailed information on the requirements to be met before releasing water offsite. Within the ACT, Guidelines for Construction and Land Development provide measurable standards for ESC.

Response

The Surface Water Management Report (SEEC, 2026) details the proposed erosion and sediment control measures and water management system for the Project. Erosion and sediment control measures have been modified to improve storm storage and management of potentially sediment-laden water. Water would only be discharged from the site in accordance with the discharge framework detailed in SEEC (2026) following confirmation that relevant water quality requirements have been achieved.

Comment

Potential impacts of the proposal to ACT ecological values are noted largely restricted to indirect impacts, including noise, dust and water pollution.

Airborne dust has potential to impact native vegetation (including Box Gum Woodland) within Melrose Nature Reserve, by blocking photosynthesis. There is also potential for dust and sediment to enter waterways and impact numerous aquatic values. These threats should all be

managed by appropriate control measures incorporated in the relevant Management Plans. Assessment of dust suppression measures should consider water availability, and any downstream impacts associated with extraction.

Response

Potential impacts associated with dust, surface water and sediment have been assessed in the relevant technical studies. Specifically, the BDAR (Capital Ecology, 2026) has considered risks associated with indirect impacts to biodiversity such as dust deposition on flora. The Surface Water Management Report includes an assessment of the Project's water demand and water balance, demonstrating that operational water requirements, including dust suppression, can be met through the proposed water management strategy while maintaining appropriate controls on runoff and discharge. Indirect impacts to adjacent native vegetation and waterways are not expected to be significant following implementation of the proposed mitigation and management measures. Following an approval, the Applicant would prepare environmental management plans to guide the operation and provide details on associated monitoring programs. Any residual impacts would be managed through the implementation of relevant management plans as required by the development consent.

Comment

The construction may increase bushfire risks and maintenance of ACT lands. Construction and ongoing maintenance of the access road and its verge from the Monaro Highway to the Quarry site will increase the risk of ignition and potentially spread fire to the ACT. The modification of the existing vegetation and arrangement of fuels on the development site has the potential to increase the fire risk to both environmental and built assets on the ACT side of the boarder.

In addition, due to the sites' proximity to the ACT boarder, it is plausible that during an unintended fire event emanating for the site, both NSW and ACTRFS/Parks resources may be dispatched. It is recommended consultation continue through the development of the site and operational considerations such as site emergency management plans.

Response

Bushfire risk has been assessed as part of the EIS, and appropriate bushfire prevention and emergency response measures would be implemented throughout construction and operation of the Project. Operational controls and emergency response procedures would be documented in the relevant management plans prepared as conditions of consent. The Applicant would continue to consult with relevant NSW and ACT emergency services during operations, where appropriate, recognising the Project's proximity to the ACT border and the potential for coordinated emergency responses.

Comment

Section 2.6.2 to 2.6.4, pg.8-14: Surveyed traffic volumes are from 2021 and were affected by public holidays and the COVID shutdown period. Given the data is over 4 years old, more recent data (ideally 2025 data) should be presented for a more realistic representation and assessment of existing traffic demands. Any application to the ACT Government should have more up to date supporting information. For assessment of the EIS, it is also recommended more recent information be used.

It is strongly recommended that further engagement with the CED Development Coordination Branch be undertaken regarding the proposed new Monaro Highway road connection prior to making a decision regarding this EIS.

Response

The Road Transport Assessment (TTPP, 2026) has been updated to incorporate the results of additional traffic surveys undertaken in November 2025 and a review of background traffic growth on the Monaro Highway. The outcomes of this review are presented in Section 3.3.5 and demonstrate that projected traffic growth applied by TTPP in the assessment that supported the EIS was accurate for weekday peak traffic growth but over-predicted traffic growth for peak hours on a Saturday. The updated surveys therefore validated the assumptions adopted in the original assessment and demonstrate that it was conservative in nature. The updated Road Transport Assessment concludes that the Project's transport impacts remain minimal, with Project traffic able to be accommodated within the existing road network and the proposed Monaro Highway intersection operating safely under forecast traffic conditions.

Comment

Development approval will be required for the construction of the proposed access road on Territory land within the ACT will be required (sic). To this end, a development application (DA) will need to be made to the ACT Territory Planning Authority This advice is provided with regard to the EIS and does not imply that the DA will necessarily be supported the ACT Territory Planning Authority.

Block 1414 Section 0 Tuggeranong is zoned NUZ2 Rural and within the Tuggeranong District under the Territory Plan 2023. There are 'Special Requirements' within the National Capital Plan within 200m of the road centre line. In addition, and separate to the DA to the ACT Government, the Monaro Highway is 'Designated Land' and therefore subject to a Works Approval from the National Capital Authority (NCA).

Response

The Applicant acknowledges the ACT Government's advice. The Applicant has continued consultation with the City and Environment Directorate, ACT Heritage and the Conservator of Flora and Fauna regarding the development application for the proposed short road and intersection with the Monaro Highway.

4.1.9 Transport for NSW

Comment

1. Landowner's consent: Transport for NSW (TfNSW) notes that the Environmental Impact Statement (EIS) prepared by R.W. Corkery & Co (Ref No. 1023/03, dated August 2025) addresses land ownership in Section 2.4.3 and Figure 2.9. However, it does not reference obtaining consent from the Transport Asset Manager of NSW (TAM), formerly known as the Transport Asset Holding Entity (TAHE). TAM is the registered owner of Lot 5403 DP1244966, which encompasses the railway corridor. Accordingly, landowner's consent from TAM is required for any proposed crossing of or works in or over Lot 5403 DP1244966. Internal discussions confirm that this consent has not been obtained at this stage for any such works.

Response

Landowners consent for the proposed railway crossing was provided by TfNSW on 8 December 2025. At this stage of the development, the landowners consent relates only to the lodgement of the development application. Formal landowners consent to develop the railway crossing would be sought once detailed designs are finalised for the crossing. This activity would occur should the Project be approved.

Comment

2. Bridge/rail crossing design: The EIS provides insufficient detail regarding the proposed crossing of Lot 5403 DP 1244966 to allow for a proper assessment of potential impacts on the Country Regional Network (CRN) rail corridor. Specifically, TfNSW has been unable to identify within the submitted EIS documentation the following required information:

a) Bridge Crossing Design: No design plans for the proposed bridge have been provided.

b) Excavation and Earthworks: The EIS lacks information regarding the extent and location of excavation or fill works, particularly whether these works exceed 2 metres in depth within 25 metres of the CRN rail corridor boundary. The plans must also detail batter slopes, retaining structures, and spoil management measures. It must be demonstrated that any earthworks will not result in land instability, erosion, or encroachment towards the rail corridor.

c) Stormwater and Drainage: A drainage design has not been included. The design must clearly demonstrate how stormwater will be managed and directed away from the CRN rail corridor, including flow paths, discharge locations, and the prevention of discharge towards or into the rail corridor.

d) Access Road and Overbridge: Structural and drainage details for the overbridge and its interface with the access road and rail corridor are missing. It must be shown that these works will not affect the stability of rail land or interfere with existing drainage systems. The above information is required not only for the TfNSW assessment but also for the DPH&I to adequately consider the environmental impacts of any road works associated with or ancillary to the proposed development. These matters must be addressed as part of the DPH&I assessment under Part 4 of the Environmental Planning and Assessment Act 1979.

Response

An approval in principle for the proposed railway crossing was provided by UGL Linx on behalf of TfNSW on 28 November 2025. The approval requires detailed design plans to be submitted for review and approval prior to any construction. This would occur following an approval of the Project.

Comment

3. Other approvals: The EIS provides limited information on how the current application aligns with the approvals required for works within the ACT, specifically, the construction of an auxiliary left (AUL) turn lane and a channelised short right (CHR(S)) turn lane on the Monaro Highway as well as the required access road/connection that is located within the ACT.

Response

Section 6.10 of the EIS considered the traffic-related impact risks associated with development of the Project and deliberately referred to impacts within NSW and the ACT. This was intended to provide a cumulative assessment of impacts and to ensure that the reader (government officer or community member) was provided with details on what is proposed. That section referred to consultation with the Development Coordination Branch of Transport Canberra and City Services (now within the City and Environment Directorate) that confirmed general support for the preferred intersection configuration as presented in Section 3.8 of the EIS and Appendix C of TTPP (2026).

The Applicant is currently awaiting advice from the City and Environment Directorate and the Conservator of Flora and Fauna on the approvals required within the ACT. Assessments have been completed on risks associated with biodiversity and cultural heritage associated with the development of the short access road and intersection within the ACT and the Road Transport Assessment (TTPP, 2026) principally focuses on the development and use of the intersection with the Monaro Highway.

The subject of how the necessary approvals may be coordinated is a matter for DPHI and the City and Environment Directorate.

Comment

4. Oversized Overmass Vehicle (OSOM) Movements: TfNSW notes that the EIS indicates potential OSOM vehicle movements during construction. However, limited information has been provided regarding these movements, particularly for high risk OSOM (as defined on TfNSW website). Additional detail is required to enable a proper assessment of proposed OSOM activities, including but not limited to the following: a) High-Risk OSOM Vehicle Movements: High risk OSOM vehicles require a concept level route assessment to determine if the route is suitable or if any road upgrades are required. This is required for each proposed route.

Response

The Project may require oversize or overmass vehicles during construction activities and TTPP (2026) nominate in Section 4.1 of the Road Transport Assessment the process that would be followed to seek the necessary permits and prepare a Traffic Management Plan for the activity, where required. To be clear there are no plans for high risk OSOM vehicles to be required and therefore a concept level route assessment is not required.

Comment

5. Other comments: a) Use of rail: TfNSW has been unable to locate sufficient information to address the requirements of Chapter 2, Part 2.3, Section 2.22 (Transport) of State Environmental Planning Policy (Resources and Energy) 2021. Specifically, the requirements of subclause 1 (a).

Response

Table 4.1 of the EIS considered the pre-conditions to granting approval, including the requirements of the State Environmental Planning Policy (Resources and Energy) 2021. With regards to Section 2.22 it was noted that there were no opportunities for rail transportation at the locality. The Applicant considered the opportunity to use the Goulburn Bombala Railway Line

in initial planning, however the opportunity would be cost-prohibitive, and it is understood that the preferred use for that route is for a rail-trail. Given that material delivery would principally be to concrete plants or construction sites within the Queanbeyan-Palerang and ACT regions, the use of rail is not warranted.

4.1.10 DCCEW – Water Group

Comment

The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to demonstrate the ability to access sufficient water entitlement by identifying potential willing sellers or available entitlement to purchase.

Response

The Project would require up to 42.4ML per year of groundwater from the Lachlan Fold Belt MBD Groundwater Source of the Water Sharing Plan for the *NSW Murray Darling Basin Fractured Rock Groundwater Sources 2020*. The Applicant has secured a Water Access Licence (WAL45679) with a share component of 45ML to ensure that any take of groundwater is accounted for.

Should the Project be approved, the Applicant would apply for a Works Approval relating to the proposed take of groundwater using a production bore and for water taken through development of the extraction area.

Comment

DPHI should ensure the proponent's works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land.

Response

Should approval be granted for the Project, the Applicant would prepare a Water Management Plan prior to the commencement of site establishment and construction. Where activities would occur on waterfront land or alter streams flowing across the Project Site, any plans for works would be described in the Water Management Plan and DPE Water would be consulted on what is proposed before activities are commenced.

Comment

DPHI should request the proponent to commit to periodically liaise with potentially impacted registered groundwater users to support the completion of a bore census.

Response

The Applicant understands that one of the registered groundwater bores is privately owned, while the second is managed by a strata management company on behalf of several landowners that have a right of access to water from the bore. Should approval be granted for the Project, groundwater monitoring at these locations would be included in a Water Management Plan for

the Project, subject to the grant of access. Further attempts to access the bores to measure existing standing water levels and water quality would be attempted during preparation of the Water Management Plan and periodically after that time.

Comment

DPHI should request the proponent to incorporate a scheduled program to validate groundwater model predictions prior to the commencement of stage 4 quarrying, when groundwater table intersection is expected. The program must include:

- *Validation against observed drawdown and water quality data*
- *Reporting of observed versus model outcomes:*
 - *After 1 year of quarry operations*
 - *Every 5 years during operations*
 - *Prior to Stage 4 quarrying, with updated predictive modelling and impact assessments*

Response

The Groundwater Assessment (Hydrogeologist, 2025) predicted that the Project presented a low risk of impact to the groundwater setting. The numerical groundwater model is considered fit for the purpose of predicting groundwater impacts in this locality and this has been confirmed through independent peer review.

The Applicant agrees to undertaking a validation of the groundwater model prior to the commencement of Stage 4 of quarrying and to update predictions of groundwater take based on monitoring data. It is appropriate that once that validation is completed, a schedule for future reporting on observed versus modelling outcomes may be established.

Groundwater use through a production bore would be reported each year in accordance with the conditions of a Works Approval for the bore and Water Access Licence 45679.

4.1.11 The Murrumbidgee and Southern NSW Local Health District Public Health Unit

Comment

It is important to note that under the provisions of the Public Health Act 2010, and Public Health Regulation 2022, the provision of water to employees utilising any staff amenities building will be considered as a private water supply. In this regard, it is recommended that the following conditions are applied to any determination of this application:

- *The applicant must demonstrate that the drinking water supplied to any office/staff amenities building used for potable consumption will consistently meet the Australian Drinking Water Guideline requirements; and*
- *The applicant must develop and adhere to a Quality Assurance Program, prepared in accordance with the requirements of the Public Health Act 2010, and the Public Health Regulations 2022.*

Further, it is recommended that a site and soil Evaluation (sic) report, carried out by an appropriately qualified and experienced wastewater consultant is submitted in support of the application to demonstrate the most appropriate wastewater management system to be installed on site which can adequately dispose of the hydraulic loading created by any staff amenities installed in association with the proposed development.

Response

The Applicant is not proposing to utilise captured rainwater or other onsite water sources for potable water supply. Drinking water for site personnel would be supplied externally, while any water captured and stored onsite would be used for ablution and operational purposes only. Sewage and effluent generated onsite would be managed using an appropriately designed onsite treatment system, either as a biocycle system or through regular servicing and pump-out by a licensed contractor.

Comment

Further, it is recommended that a site and soil Evaluation (sic) report, carried out by an appropriately qualified and experienced wastewater consultant is submitted in support of the application to demonstrate the most appropriate wastewater management system to be installed on site which can adequately dispose of the hydraulic loading created by any staff amenities installed in association with the proposed development.

Response

The detailed design of the onsite wastewater management system, including the selection of an appropriate treatment and disposal method and, where required, identification and sizing of any associated land application area, would occur during construction. The final design and implementation of the system would be prepared in consultation with Council. Therefore, any Quality Assurance Plan (QAP) for drinking water and effluent management system would be finalised following receipt of an approval for the Project.

4.1.12 Department of Primary Industries – Agriculture

Comment

It is noted that there is a large tract of land to the north of the quarry site that extends to Tralee and Environa that is partially cleared land and appears suitable for extensive grazing. No consideration of that land has been included in the EIS. The existing land use of that area should be outlined, and if used for agriculture, the following points need to be assessed:

Land to the north of the quarry towards Tralee and Environa

- Detail the current use of the land to the north of the quarry. Outline the current and historical agricultural land uses including the land capability and agricultural productivity.*
- Detail the potential impacts of the proposal on agricultural land and agricultural land uses in that area.*

- *Assess impacts on any agricultural support services, processing and value adding industries.*
- *Undertake a LUCRA to objectively assess the effect of the proposal on those neighbouring land uses. Identify potential impacts the proposal may have on nearby existing agricultural land uses and activities and outline appropriate mitigation measures and a monitoring program.*

Response

A Land Use Conflict Risk Assessment (LUCRA) has been prepared for the Project and is presented as **Appendix 8**. The LUCRA identifies historic and existing land use practices that are limited to sheep grazing, selective cropping and rural residential blocks. There is no evidence of agricultural support services, processing and value adding industries. Impacts to agricultural land and land use practices may result from the generation of noise and dust from quarrying activities and through quarry-related traffic. Impacts to existing agricultural practices on the Property and to the south of the Project Site would be mitigated under the Project including the construction of a 3m high barrier fence and road sealing. Land directly adjacent to the Quarry Site extraction area to the north features steep terrain and native vegetation in good condition. Land more suited to agricultural uses is over a kilometre to the north and is not likely to be impacted by noise or dust generated by the Quarry. Traffic for the operation is directed south and so not a risk to agricultural land uses here.

Comment

...the current land use of the quarry owned land itself requires detailing.

- *Outline the current and historical agricultural land uses including the agricultural productivity and any proposal for continuing agriculture on the quarry owned land, if applicable.*
- *Detail the location and areas of land to be temporarily removed from agricultural land use on quarry owned land, and those areas which are to be returned to agricultural use on completion of the development.*
- *Detail the potential impacts of the quarry on agricultural land and agricultural land uses on the quarry site.*
- *Assess impacts on any agricultural support services, processing and value adding industries.*

Response

Existing agricultural practices on the land owned by the Applicant are also described in the LUCRA and include predominantly sheep grazing with selective cropping. It is not anticipated that the development of the Project (which represents 67.6ha within the 545ha landholding) would compromise existing agricultural productivity.

It is anticipated that, following completion of quarrying activities, the majority of the land may be return to agriculture or revegetated with native vegetation. The Quarry void would be retained as a water storage and may be accessed for agricultural land use.

Comment

The Department recommends that the following be included in the EIS:

- *conduct a comprehensive assessment of biosecurity risks and impacts and understand their legal obligations under the NSW Biosecurity Act 2015.*
- *develop a Biosecurity Management Plan, considering:*
 - *activities that could lead to the introduction, presence, or spread of a pest or disease of plants or animals, a pest animal or a weed*
 - *effective management of risks during both the construction and operational phases*
 - *effective management of bulk earthworks (potential soil contamination), excess fill and new fill for the site*
 - *identify risks, prioritise and develop strategies to prevent, eliminate or minimise these risks and develop contingency plans for any failures. Include monitoring and mitigation measures for weed and pest management.*

Response

The Applicant would develop a Biosecurity Management Plan following an approval of the Project as part of the Quarry Biodiversity and Rehabilitation Management Plan. The plan would include a description of the Applicant's obligations for management of the Project Site as required under the *NSW Biosecurity Act 2015*.

Comment

While it is noted that options for the final landform and land use are outlined, within the EIS, the future purpose for the quarry void should be outlined, stating its future use and any works required for alternative uses of the void.

While it is noted that the EIS commits to preparing a rehabilitation plan post approval, it is noted that a decommissioning plan has not been addressed. A plan for decommissioning and closure of the site should also be developed.

Response

The following presents a summary of information relating to the quality of soil and pasture to be placed over the infrastructure and processing and stockpiling areas, as well as further details on the future purpose and management of the void.

A Soil and Land Capability Assessment for the Project was undertaken by SEEC (2025) and is summarised in Section 6.11 of the EIS. In summary, the soils within the Project area:

- have a variable infiltration rate ranging from very slow to very rapid;
- have a high wind erodibility rating;
- are moderately to highly dispersible;
- are non-saline;

- are moderately to strongly acidic;
- are non-sodic (excepting the sample from Test Pit 2); and
- are very weak to weakly leached (indicating their limited capacity to hold any additional nutrients applied).

Land capability class varies from class VI – VII, class V, and class II – IV.

The Applicant commits to ensuring the soil and pasture is replaced to the same land capability class and structure, as well as the same pasture productivity. Soil and pasture tests would be carried out on similar landforms (analogue sites) prior to closure and rehabilitation to enable benchmarking and monitoring.

Planning for decommissioning and closure of the Project would be presented in the Biodiversity and Rehabilitation Management Plan and cover the proposed rehabilitation objectives and provide sufficient information to inform the calculation of a Rehabilitation Bond for the Project. As the Project is developed, more detailed plans for decommissioning and closure would be presented and be informed by monitoring outcomes and any changes to landform planning that occur over the life of the Project.

4.2 Organisation and Public Submissions

4.2.1 Introduction

This section presents a response to the matters raised in submissions received from public organisations and individuals. The responses take into account the action taken since exhibition of the EIS (as discussed in Section 3).

Individual responses to every comment are not provided in this section. Instead, a selection of comments from various submissions—chosen for their representation of the key issues raised—have been extracted and presented in *italics*, with original spelling and grammar preserved. A response to the matters raised is provided, however in some cases the specific submission or submitter is responded to. This particularly applies to those members of the public living in Royalla who are recognised to be most likely to experience change as a result of approval of the Project.

Appendix 1 contains a register of all submissions, along with a checklist identifying the matters raised in each and where they have been addressed within this document. While the references are necessarily broad, they are intended to assist individual submitters in locating the relevant sections that respond to their concerns. Considerable effort has been made to accurately reflect each submission and the issues raised. However, it is acknowledged that some submitters may not agree with the responses provided or may feel their concerns have not been fully addressed. The Applicant remains open to further engagement with the community on these matters.

4.2.2 Aboriginal Heritage

4.2.2.1 Cultural Significance of the Royalla Landscape

Representative Comment(s)

As a proud Ngunnawal man I have watched Royalla grow from a sheep farm into an environmentally strong corridor for native animals to travel and use. This rejuvenated landscape has allowed me to enjoy a more culturally significant life on our property. Some of the wildlife will be impacted by the quarry which will negatively impact my cultural ties to country.

Submission No. SE-93799457, Royalla

My husband and children are Ngunnawal, so aboriginal culture is very important to our family and many other culturally sensitive residents.

Submission No. SE-94106732, Royalla

the proposed sight sits close to a sacred indigenous site near Theodore - Indigenous grinding groves the area has culture significant for the Ngunnawal and Ngambri people.

Submission No. SE-94637707, Conder

Response

The Applicant acknowledges the cultural importance of the Royalla landscape for Aboriginal communities, including Ngunnawal and Ngambri peoples. Submissions have highlighted the area's role in supporting cultural identity, native wildlife, and ongoing connection to Country. The ACHAR (Past Traces, 2026) considered these values through consultation with RAPs, including Ngunnawal representatives (see Section 2 of the ACHAR).

While most identified sites were assessed as low archaeological significance, the Extraction Area was revised to avoid impact to a culturally significant modified ring tree. Mitigation measures—including salvage, return to Country protocols, protective fencing, and continued consultation—form part of the Project's Heritage Management System (see Section 9 of Past Traces, 2026). These measures aim to respect both the physical heritage and the broader cultural landscape.

4.2.2.2 Aboriginal Cultural Sites and Artefacts

Representative Comment(s)

This quarry is paying no attention to the significant indigenous heritage known to exist within the proposed site. Both a known ring tree, used as a guidance device, and a scar tree, utilised for both product and potential spiritual significance to the local indigenous peoples, providing direct links to their ancestors and beliefs.

Submission No. SE-94664709, Calwell

The documents list the artefacts found as insignificant, to find any existing artefacts around this area is amazing as the aboriginals were displaced from this area around the 1880s when the pastoral lands were acquired. These artefacts are valued and should be left undisturbed, after all there are very few cultural artefacts left on Ngunnawal country. Ten to twenty metre barrier is insufficient to protect these artefacts, any mitigation strategy will not protect those trees from the effects of blasting.

Submission No. SE-94106732, Royalla

We have real concerns about the protection of the incredibly rare ring tree located less than 20m from the proposed pit & artefacts still to be surveyed for.

Royalla Landcare, Submission No. SE-95028960, Royalla

Response

The Applicant recognises the cultural value the identified sites may hold for Aboriginal communities. The significance of the culturally modified trees has been identified in the ACHAR (Past Traces, 2026) and measures put in place to avoid the sites and establish a buffer to impact. The separation distance from the ring tree was determined following consultation with the Project ecologists as well as the blasting consultant. The ring tree would be separated from the Extraction Area by a 10m buffer area as well as a light vehicle road and safety bunding that would be constructed along the circumference of the area.

Past Traces (2026) has identified 21 Aboriginal heritage sites consisting of isolated finds, small artefact scatters, potential culturally modified trees and subsurface deposits. These sites are mainly confined to the level areas of creek ridgelines, descending spur lines and creek flats. The

majority of sites were assessed as being of low archaeological significance, consistent with open occupation patterns common in the region. Mitigation measures—including surface collection, subsurface testing, and return to Country protocols—would be implemented as part of the Heritage Management System. These measures are designed to limit cumulative impacts and ensure compliance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW.

4.2.2.3 Consultation with Aboriginal Communities

Representative Comment(s)

The Indigenous Artefacts that were found on site during the survey, has there been consultation with Indigenous members allowing the quarry to go ahead on this land? I think not.

Submission No. SE-93873708, Royalla

Will a survey be conducted with the Ngunnawal LALC ...This is a highly sensitive area for the Ngunnawal people and as such their land should be respected.

Submission No. SE-94923479, Royalla

I notice that multiple organisations claiming to be have cultural claim over the land have been consulted for the Aboriginal Impact Statement. How were differing advice/opinions from the different groups treated?

Submission No. SE-94923479, Royalla

Response

A comprehensive outline of the process used to identify and consult with Aboriginal stakeholders for the ACHAR (Past Traces, 2026) is described in detail in Section 2 of the report and Section 6.8.2.4 of the EIS. The registration and notification of Aboriginal stakeholders and their involvement in the assessment process was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010a) and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010b).

Consultation included, but was not limited to, engagement with multiple Ngunnawal representatives and organisations, such as the Ngunnawal Elders Corporation, Ngunnawal Pajong/Wallabaloa Descendents, Karlari Ngunnawal Pajong / Wallabaloa Descendents, and Ngunnawal Heritage Aboriginal Corporation, who participated in both the registration process and the field survey. RAPs were consulted in regard to the proposed survey methodology and the subsequent management and mitigation measures that are to be implemented throughout the Project development.

Feedback from RAPs directly informed the redesign of the Extraction Area and Visibility Barrier to avoid culturally modified trees within the Project Site.

There was no differing advice received from the RAPs on the outcomes of assessment and the intended management of identified site.

Representative Comment(s)

The proponent must satisfy the Due Diligence Code and seek any necessary Aboriginal Heritage Impact Permit only after robust consultation.

Submission No. SE-94827459, Royalla

Response

As the Project is classified as State significant development, an Aboriginal Heritage Impact Permit under Section 90 of the *National Parks and Wildlife Act 1974* is not required; however, the assessment of heritage impacts is incorporated into the broader environmental approval process administered by DPHI.

4.2.3 Agriculture

Representative Comment(s)

There has also been no assessment of the noise and blasting impacts on animals. In my view, the proposed operations at the quarry are likely to startle and stress livestock, particularly those that may graze near the quarry boundary. Chronic exposure to noise and blasting, may lead to issues such (sic) behavioural changes in the animals (sic), reduced productivity and compromised animal welfare – and impacts which have not been considered or assessed as part of MRPL's assessment.

Of particular concern is the severe windy nature of the area – this wind can be a southerly and/or westerly, which increases the risk that dust generated from crushing and haulage activities will settle on grazing land, potentially affecting pasture quality and leading to respiratory issues in livestock. There has been no assessment of the potential for RCS exposure in livestock or the long-term impacts on animal health.

Submission No. SE-95064459, Sydney

Not only will the noise impact on residents but it can scare and cause injury to livestock, horses and pets.

Submission No. SE-93232707, Royalla

Horses are easily spooked and stressed, to have a blast everyday with horses in nearby fields will cause a horse stress and will create ongoing issues with those horses. No mitigation strategies will save these horses from stress, I can't remember reading how they address this issue or even acknowledge it as a major safety concern.

Submission No. SE-94106732, Royalla

Response

Impacts to grazing sheep on land adjacent to the Project Site may be considered akin to indirect impacts. Indirect impacts may occur to land adjacent to operating areas through the effects of noise, air quality (dust) and edge effects. To account for possible indirect impacts, Capital Ecology (2026) applied the following reductions in biodiversity value for the purpose of the BDAR.

1. A 20% reduction in biodiversity value within 50m of the extraction, processing, and stockpiling areas.

2. A 20% reduction in biodiversity value within 30 m of the unsealed section of the Quarry Access Road.
3. A 10% reduction in biodiversity value within 100 m of the extraction, processing, and stockpiling areas.
4. A 10% reduction in biodiversity value within 30 m of the sealed section of the Quarry Access Road.

Grazing land adjacent to the Project Site is greater than 100m from the extraction, processing, and stockpiling areas and therefore is unlikely to experience the effects of noise, dust or blasting. It is noted that blasting would be infrequent and most likely to be experienced as a distant rumble rather than a sharp impact noise that may startle animals. Grazing animals that are accustomed to aeroplanes flying over the land are not likely to be startled by operational noise or blasting.

The air quality criteria applied in the AQIA (Northstar, 2026) including the PM₁₀, PM_{2.5}, and dust deposition standards prescribed under the NSW EPA's *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* are established primarily to protect human health and residential amenity at defined sensitive receptors. The NSW regulatory framework does not prescribe separate criteria for livestock exposure or agricultural productivity, and agricultural land is not generally treated as a "sensitive receptor" in the same manner as residences, schools, and other human-use locations for the purpose of compliance assessment. Accordingly, applying human health and amenity criteria directly to grazing land would represent adopting thresholds that were not developed for that receptor type and are not an approach specified in the relevant guidelines.

The literature examining dust impacts on agricultural productivity primarily relates to conditions of substantial foliar dust loading (such as near unsealed roads or extractive operations) where deposition rates can reach several times criteria levels and are sufficient to cause visible coating and measurable changes in leaf function (light interception, stomatal effects) that may translate to reduced growth under certain conditions. For example, a review commissioned by the WA EPA indicates that deposition of around 4.5 g/m²/month can be associated with an estimated approximately 10% reduction in net dry matter production, with higher deposition producing larger effects. In contrast, the incremental dust deposition predicted in this assessment is less than 0.1 g/m²/month, one to two orders of magnitude below the deposition levels typically associated with measurable vegetation productivity effects in the literature.

The modelled incremental contributions at the nearest sensitive receptors at distances comparable to the subject land are low. The 24-hour average PM₁₀ concentration is reported as the highest single 24-hour average across all 365 modelled days, representing a true worst-case increment; on this basis, the maximum incremental value was between 1.0µg/m³ and 2.0µg/m³. The corresponding maximum incremental 24-hour average PM_{2.5} concentration was between 0µg/m³ and 1µg/m³, and modelled dust deposition was less than 0.1 g/m²/month. These contributions are incremental to an existing background environment in which particulate levels can vary episodically due to dry ground conditions, stock movement, farm and unsealed-road traffic, and regional events such as dust storms and bushfire smoke. In that context, the project's incremental contribution is not expected to produce a material change in ambient conditions across the subject land.

The assessment also considered the composition of predicted particulate concentrations, not only total mass loading. Potential respirable crystalline silica (RCS) exposure was assessed on an annual average basis and is predicted to be well below the applicable criterion. The maximum

predicted annual average incremental RCS concentration at any modelled receptor was $0.24\mu\text{g}/\text{m}^3$, compared with a criterion of $3\mu\text{g}/\text{m}^3$. This indicates that even for this higher-specificity particulate constituent, predicted concentrations remain comfortably within the relevant health-based benchmark.

Finally, whilst this concern has been carefully considered, at the predicted incremental levels of PM_{10} , $\text{PM}_{2.5}$, and dust deposition, no plausible mechanism has been identified by which the proposal would cause measurable adverse effects on stock health, pasture productivity, or land carrying capacity. The objection does not specify a pathway of impact or provide evidence that the predicted incremental particulate loading would translate to agronomic or veterinary harm. Given the low predicted increments, and their conformance with the most stringent applicable human health and amenity criteria at sensitive receptors, the concern raised does not provide a reasonable basis to modify the proposal.

4.2.4 Air Quality

4.2.4.1 Air Quality – General Dust

Representative Comment(s)

Dust suppression over a 30-year period is not a guarantee. Further there will be no active dust mitigation during the night when the plant is not operating.

Submission No. SE-93099457, Royalla

I am not satisfied that the company has provided a good enough explanation of how they will handle this dust. Watering down is the usual method I believe but what happens when the area has one of its frequent drought periods?

Submission No. SE-93269958, Royalla

I asked if there will be new processing equipment used with dust suppression built in and not the use of old second hand equipment.

Submission No. SE-94704207, Theodore

Response

Northstar Air Quality Pty Ltd assumed a range of emission controls in the dispersion models of the Air Quality Impact Assessment (AQIA) (hereby referred to as Northstar, 2026) (**Appendix 2**). These controls would be implemented for dust and particulate matter suppression during the Project, as outlined in Section 6.2.6 of the EIS.

The application of water for dust suppression would be used on all access roads, materials crushing and screening operations and for transfer of materials and loading of stockpiles from the plant. Water availability, including use for dust suppression, has been considered in the Surface Water Management Report (SEEC, 2026). SEEC (2026) determined that the Project's demand for water supply, including for water suppression activities, would be met >98% of the time (SEEC, 2026). However, a shortfall of up to 3.1ML per annum is predicted during Year 4, with an annual average shortfall of ~0.6ML per annum.

During events when there is a shortfall, as stated in Section 7.5 of SEEC (2026), the Project would either:

- Reduce water usage through the use of chemical dust suppressant.
- Seek an external water source and tanker water to the quarry.
- Temporarily reduce the scale of operation and limit concrete production to ensure the dust management objectives are being achieved.

The first priority for water supply would be water for dust suppression.

Mitigation measures for dust dispersion, listed in Section 6.2.6 of the EIS, would not only include water suppression but also through management of how equipment is used and maintained. This includes fabric filters on drill rigs, regular servicing of the drill rig dust collection system, reverse pulse dust filters of materials storage silos and maintenance of mobile equipment in accordance with the manufacturer's specifications.

Dust suppression would be applied during operating hours, when dust generating activities (e.g. blasting and hauling) are occurring and mitigation is required. Outside of operating hours, dust generation would be limited to wind blown dust from stockpiling areas, however would not be expected to result in significant dust generation. Northstar (2026) has identified that the principal source of dust is vehicles tyres on roads.

Representative Comment(s)

Monaro Rock's wind forecast is based on data from Isabella Plains. While this is the closest weather monitoring station, it is in a valley and surrounded by suburbs. By comparison, the quarry site is near the top of a hill and exposed. It is likely that the wind forecasts are understated and there will be many high wind days exceeding the EIS' forecasts that will carry dust in many directions. All wind testing should be done locally on site.

The Royalla Community Association
Submission No. SE-95108463, Royalla

Response

As part of the AQIA, a detailed dispersion modelling assessment was performed using the NSW EPA approved CALPUFF atmospheric dispersion model. Meteorological data was inputted into this model, including wind speed and direction. In order to ensure data quality assurance, meteorological data was collected from Automatic Weather Stations (AWSs), operated by the Australian Government Bureau of Meteorology, allowing for collection of five years of completed data. Tuggeranong (Isabella Plains) AWS was considered the most likely to represent conditions at the project site, as it was the closest AWS to the Project.

While data for wind speed and direction was collected from Isabella Plains, data collected from an AWS ensures data quality assurance, and data has been incorporated into the modelling programs to more accurately reflect site conditions.

Queries from the NSW EPA regarding this data have been addressed in the updated AQIA (Northstar, 2026) and as described in Section 3.3.1 and in the response to the EPA comments in Section 4.1.2. In summary, review of the varied topography of Tuggeranong and the Project Site,

identified fewer periods of calm conditions and the assessment outcomes have been updated to reflect this refinement to the dust dispersion modelling inputs. It should be noted that the updated modelling did not materially change assessment outcomes.

Representative Comment(s)

It is widely known that the air quality in the area is already impacted significantly in winter due to the ACT wood heating practices.

Submission No. SE-93320957, Royalla

The other control measures identified in the EIS are all self-regulated, with 'an assumed air quality monitoring program' there is little to no assurance that the operator will apply these measures or have any responsibility for third party users of the site being compliant.

Submission No. SE-94979458, Royalla

The Air Quality Assessment identifies that exceedances in particular matter monitoring from the quarry are a result of elevated background concentrations likely due to wood heater smoke. What this shows is that our air quality is already poor, and the quarry could exacerbate it. Significant efforts are being made to improve our air quality and the proposed development would be a step backwards in air quality for our region.

Submission No. SE-95037215, Canberra

Response

The impacts of wood heating practises in relation to the Project's air quality impacts are discussed in Section 6.4 of the AQIA (Northstar, 2026) and Section 6.2.8.3 of the EIS. Existing exceedances historically monitored at representative locations close to the quarry were caused by hazard reduction burns or occurred in winter when it would be expected that increased use of wood-fired heaters would cause high levels of fine particulates to be present. The predicted contribution from the Quarry would be minor when compared to these sources of particulates.

To manage dust impacts to nearby sensitive receptors, the Project would implement an Air Quality Management System including trigger actions response plans. The proposed monitoring would provide real-time meteorological and air quality observations that would inform reactive management, should air quality conditions indicate a potential exceedance of the nominated air quality criteria. Any exceedance of air quality criteria must be notified to DPHI and EPA immediately and outcomes presented in annual reporting for the Project.

Representative Comment(s)

In scrolling through Appendix B Air Quality Impact Assessment prepared by Northstar Air Quality Pty Ltd on page 97 of the Mitigation and Monitoring section advises that Should chemical suppressant be the dust control method of choice, then its effectiveness would be reviewed and additional suppressant applied as required. Exactly what chemical suppressant is to be used and what could be the short – long term environmental / human impact? Is this going to be another PFAS issue right on our doorstep.

Submission No. SE-95062963, Tralee

Response

The application of chemical-based suppressants / sealants for dust management is a standard practice used in the quarrying, road construction and other construction industries either for application at the point of material crushing or applied in water carts to haul roads. The suppressants are biodegradable and would not result in a contaminants entering the air.

Representative Comment(s)

Dust will collect on roofs impacting the efficiency of solar panels and requiring more regular cleaning.

Royalla Community Association
Submission No. SE-95108463, Royalla

Response

The AQIA (Northstar, 2026) has predicted relatively low levels of dust generation as a result of the Project, it is not anticipated that that dust from the Project would cause or exacerbate dust deposition on solar panels on properties in the local area. The separation distance of more than 1.5km would limit the volume of dust that may disperse from operating areas.

4.2.4.2 Air Quality – Odour

Representative Comment(s)

I am very worried about the smell from the asphalt plant. One only has to drive past a road being asphalted to realise how bad a smell this is. Residents won't be able to open their windows for fresh air without getting that bad strong smell coming in.

Submission No. SE-93253460, Royalla

Asphalt and concrete production create odours that will carry long distances on strong winds and be an irritant or nuisance for residents in the ACT and NSW. This can be especially impactful for pre-existing respiratory conditions such as asthma, bronchitis, and COPD.

The Royalla Community Association Inc
Submission No. SE-95108463, Royalla

Let's add to that the foul smell of hot mix asphalt blowing over from the quarry and delivery trucks as well as the relentless stink of diesel exhaust that will now flow through our windows as the trucks roll on by, this is impossible to mitigate am I not correct?

Submission No. SE-94970211, Royalla

Response

The assessment of odour presented in the AQIA (Northstar, 2026) has been updated to refine the assessment of odour in response to comments received from the EPA. The assessment outcome are presented in Section 3.3.1 and Section 6.3 of Northstar (2026).

The updated modelling of odour predicts marginally higher levels of odour (1.3 OU) than those presented in the original assessment, though outcomes remain well below the adopted criteria of 2.0 OU that was based on population density. As a result, it is unlikely that odour from asphalt production would be detected at private residences.

4.2.4.3 Air Quality – Asphalt emissions

Representative Comment(s)

...the asphalt plant risks are significant and almost have no coverage in the EIS.

This is well covered in literature with the following Science Direct statement summarising the risks, “Asphalt-related emissions pose significant health risks due to the release of volatile organic compounds (VOCs) that affect both workers in construction and the general public”.

Submission No. SE-95114708, Royalla

This EIS was the first time I was aware of the asphalt plant. From this website Health Risks of Asphalt Emission: State-of-the-Art Advances and Research Gaps - ScienceDirect Asphalt-related emissions pose significant health risks due to the release of volatile organic compounds (VOCs) that affect both workers in construction and the general public.

Submission No. SE-95114991, Royalla

Response

The assessment of VOCs relied upon outcomes at other operations where asphalt production would occur at much higher intensity than at the Project. However, the assessment of VOCs was updated with the outcomes presented in Section 3.3.1. In summary, Northstar (2026) assessed potential emissions of oxides of nitrogen (NOX) and Volatile Organic Compounds (VOCs) associated with asphalt production. The predicted worst-case emissions (99.9th percentile incremental 1-hour concentrations) of NO₂ and VOCs would be significantly below the relevant criteria provided in the *Protection of the Environment Operations (POEO) (Clean Air) Regulation 2022*.

4.2.4.4 Air Quality – Traffic Dust

Representative Comment(s)

One thing is crystal clear, FOG would prefer that the entire length of the quarry access road be sealed to prevent avoidable dust impacts. Musing frankly, proposing a project of this nature and scale on partly sealed road appears strategic.

Friends of Grasslands
Submission No. SE-94526458, Curtin

The proposed level of vehicle movements cannot but generate large volumes dust, and the provision of fencing will not limit visual impacts of both the fencing and dust saturation to the surrounding vegetation.

Submission No. SE-95078713, Royalla

Dust suppression: During the dry summer months, December to April, when dust suppression may be most difficult, the prevailing wind direction is easterly and users of the rail trail could be subject to poor air quality. If the access road is unsealed then trail users will certainly be subject to dust as trucks travel parallel and close to the rail corridor. We do note that the EIS statement reports that there will be no discernible changes to the air quality. However, an assurance that the access road is to be sealed along that section close to the rail corridor would alleviate concerns from MRT Inc.

Monaro Rail Trail Inc
Submission No. SE-94822707, Steeple Flat

Response

The Quarry Access Road would be sealed for the length of 2.7km from the intersection with the Monaro Highway. This includes the section of access road passing the Goulburn Bombala Railway. The Secondary Access Road would be sealed for the length of 120m from the intersection with Mates Drive. A 3m high fence would follow the sealed length of the Quarry Access Road, further mitigating dust generation and dispersion. The remainder of the access road from the Quarry operating area to the south towards Enchanted Hill would be unsealed and graded.

Northstar (2026) identified a range of mitigation measures concerning transport that would be implemented to ensure the Project achieves the annual average air quality criteria for dust deposition (see Section 2.10 of the Northstar (2026) and Section 6.2.6 of the EIS). Mitigation measures include:

- Application of water or chemical suppressants on unpaved roads to achieve a 90% particulate control efficiency, and application of water on paved roads to achieve a 30% reduction in particulate emissions.
- Speed on paved and unpaved roads would be limited to 30km/hr.
- 3m high fencing and planting of vegetation along the paved haulage route from the Project Site.

4.2.5 Biodiversity

4.2.5.1 Terrestrial Ecology

Representative Comment(s)

The EIS also requires a commitment that the native vegetation in the unaffected areas will be managed sustainably, requiring control of invasive weeds, treatment of erosion and judicious management of wildfire risk.

Queanbeyan Landcare Group
Submission No. 95018474, Queanbeyan

Response

The BDAR (Capital Ecology, 2026) and EIS (Section 6.7.5.3) outline a suite of management measures for retained vegetation, including annual weed and feral animal control within 200m of the disturbance footprint, erosion control, and progressive rehabilitation. These measures are designed to maintain biodiversity values and ecological function in unaffected areas.

Management of bushfire risk is detailed in Section 6.14.2 of the EIS. An Emergency Management and Evacuation Management Plan would be prepared in consultation with the RFS to outline hazards and identify controls and measures for fire risk reduction. Additionally, the Project's Environmental Management Plans would include provisions for vegetation health, surface water management, and dust suppression, which indirectly support fire resilience. These commitments ensure that retained native vegetation is actively managed in accordance with best practice.

Representative Comment(s)

The EIS completely fails to take into account...the Tuggeranong Hill Nature Reserve which is only separated from the proposed project site by the Monaro Highway. Despite being less than 2km away, the Tuggeranong Hill Nature Reserve is not even mentioned in the EIS at all. While the EIS has apparently been limited by the ACT/NSW border, I note that birds and wildlife are not constrained by such arbitrary lines.

Submission No. 95073459, Conder

Response

The BDAR (Capital Ecology, 2026) and EIS (Section 6.7.2) assess ecological impacts within the NSW jurisdiction, in accordance with the *Biodiversity Conservation Act 2016* and the BAM. While Tuggeranong Hill Nature Reserve lies within the ACT and is not directly referenced, the BDAR includes landscape-scale assessments of habitat connectivity and fauna movement corridors that extend beyond the Project Site. The Project is situated between large expanses of Box-Gum Woodland, and the design has been refined to maintain ecological connectivity across the locality. These measures ensure that broader ecological processes, including wildlife movement across jurisdictional boundaries, are considered in the impact assessment.

Representative Comment(s)

It is important to note the Bogong moths are on the endangered species list and any proposed project that would impact them should not be allowed.

Submission No. SE-93799457, Royalla

Response

The Bogong Moth (*Agrotis infusa*) is listed as endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). However, the BDAR (Capital Ecology, 2026) did not identify suitable habitat for this species within the Project Site. The species is typically associated with alpine and subalpine environments, which are not present within the Project footprint. As such, the Bogong Moth was not assessed further in accordance with the BAM, which requires assessment only where habitat is present or species are recorded. The Project's biodiversity monitoring program would remain adaptive to emerging data and the Applicant would respond accordingly should new evidence of habitat use arise.

Representative Comment(s)

I am writing as a concerned community member regarding the potential impacts of the proposed Monaro Rock Quarry on hill-topping behaviour and hill-topping sites used by butterflies in the Royalla region...hill-topping behaviour is highly site-specific and small topographic or visual changes can render a site unusable, producing local population declines that are not Fixed by generic offsets.

Submission No. SE-95099710, Royalla

Response

The BDAR (Capital Ecology, 2026) did not identify hill-topping butterfly species or hill-topping sites within the Project Site during targeted fauna surveys. The Project footprint avoids prominent ridgelines and elevated landforms typically associated with hill-topping behaviour. While this behaviour is recognised as ecologically important, the BAM requires assessment only where species or habitat features are present. In the absence of recorded hill-topping species or suitable topography, this matter was not assessed further. However, the Project includes visual screening, progressive rehabilitation, and biodiversity monitoring (EIS Section 6.7.5.3), which will help minimise topographic and visual disruption and allow for adaptive management if new information emerges.

4.2.5.2 Aquatic Ecology

While aquatic ecology was not identified as a specific assessment requirement in the SEARs for the Project, potential impacts to watercourses and aquatic habitats were considered in the BDAR prepared by Capital Ecology (2026) and summarised in Section 6.7 of the EIS. The BDAR confirmed that no groundwater dependent ecosystems were present within the Project Site (EIS Section 6.7.4.1; BDAR Section 3.2.3).

Representative Comment(s)

The vibrations and explosions from the quarry will irrevocably damage the habitat and watercourses in the region (with particular concern about Jerrabomberra Creek which flows into the environmentally sensitive - and beautiful - Jerrabomberra Wetlands).

Submission No. SE-92375707, Googong

Response

The Project has been designed to avoid direct disturbance to downstream watercourses, including Jerrabomberra Creek. Clean water diversion drains, sediment basins, and bunding would be installed to manage runoff and prevent sediment-laden water from entering aquatic environments (EIS Section 3.15 and Section 6.7.3.3). Groundwater use would be subject to licensing and monitoring under the *Water Management Act 2000*, and the Project's water management system is designed to avoid interference with natural groundwater flows (EIS Section 3.15).

Any discharge from sediment basins would be required to meet the conditions of an Environment Protection Licence (EPL), ensuring water quality remains within acceptable limits. These may include but not be limited to the following.

- pH: 6.5–8.5
- Electrical conductivity: 30–350µS/cm
- Total Suspended Solids: ≤ 50mg/L
- Turbidity: 2–25 NTU (for aquatic systems)
- Dissolved oxygen: (% saturation)
- Visual clarity, colour, and absence of oil and grease

Any discharge exceeding these limits would be classified as an incident, and immediately reported to DPHI and the NSW EPA. Incident investigation and reporting protocols would be outlined in the Project's Water Management Plan (see EIS Section 3.15.4).

The Project does not involve direct disturbance to Jerrabomberra Creek or the Jerrabomberra Wetlands. Indirect impacts such as sedimentation and vibration have been considered, and mitigation measures including sediment basins and clean water diversion drains have been incorporated to protect downstream water quality (EIS Section 6.7.3.3).

Representative Comment(s)

Some of the wildlife will be impacted by the quarry which will negatively impact my cultural ties to country, include:-

a) We have turtles in the dam on our property. Turtles are highly susceptible to silica dust as it can block their eyes and can block their organs if ingested.

Submission No. SE-93799457, Royalla

Response

Potential dust impacts, including silica dust, have been addressed in the EIS (Section 6.2) and Air Quality Impact Assessment (AQIA - Northstar, 2026). Dust suppression measures, vegetated buffers, and progressive rehabilitation would be implemented to minimise risks to sensitive aquatic fauna, including turtles to dust (EIS Section 3.16). All turtles are protected species in NSW and the Eastern Long-necked Turtle (*Chelodina longicollis*) was identified within the property during field survey. However, there is no indication in the AQIA that dust generation would be anywhere near levels that may impact water quality, nor would sediment in any controlled water discharge be likely to impact the species.

4.2.5.3 Threatened Flora and Fauna

Representative Comment(s)

The land clearing proposed will reduce the extent of a threatened grassy ecological community, abbreviated here as Box Gum Woodland (BGW), which is protected at the NSW, ACT and national levels (in each jurisdiction it is critically endangered). The BGW that will remain within the property boundary will almost certainly be indirectly impacted by a substantial alteration to the surface water drainage pattern, and is likely to be impacted by increases in noise, vibration, light and air pollution from particulates especially dust.

Friends of Grasslands (FOG), Submission No. SE-94526458, Curtin

As FOG notes, the project's integrated form, large scale and lengthy duration will result in serious, irreversible direct and indirect impacts to critically endangered Box-Gum Woodland (BGW) and all the species within it. It will push a grassy forest community closer toward a threatened status. These impacts are simply unacceptable.

Conservation Council ACT Region, Submission No. SE-95026219, Canberra City

the direct clearing of 78Ha of woodland will have irreparable impact on the remaining 218Ha of high quality Box-Gum Grassy Woodland listed under the EPC Act of 1999 & protected also in ACT & NSW as critically endangered and also zoned C2 in NSW.

Royalla Landcare, Submission No. SE-95028960, Royalla

Response

The feedback from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) - Conservation Programs, Heritage and Regulation Group (CPHR) on the Project considered if the proposed clearing of Box-Gum Woodland would be likely to result in Serious and Irreversible Impacts (SAII) and provided the following advice.

It is unlikely that the proposed development will have a SAII on the BGGW. Nevertheless, the significance of the remnant in the local context and in providing important habitat to threatened woodland birds should be considered.

The Applicant recognises the importance of Box-Gum Woodland to the community. Capital Ecology (2026) identified 22.44 ha of vegetation within the Project Site as consistent with the critically endangered Box-Gum Woodland ecological community (PCT3376), listed under both the EPBC Act and BC Act. This includes 12.29 ha of high-quality vegetation (Condition Class A) and 10.15ha of lower-quality vegetation (Condition Class B). An additional 5.39ha will be indirectly impacted by dust, noise, and edge effects. The impacted areas represent 10% of the Box-Gum Woodland within the Project Site, 4% in the immediate locality, and just 0.009% of the Box-Gum Woodland estimated extent in NSW, and 0.006% of the estimated national extent.

While the Project is situated between extensive areas of Box-Gum Woodland, with direct impacts occurring primarily along the edges of these expanses, Capital Ecology (2026) noted that post-development, these large woodland areas would remain intact and are expected to be of sufficient size and strategic location to support movement corridors and maintain ecological connectivity across the locality.

Notwithstanding, the Project footprint was refined to avoid higher-quality Box-Gum Woodland where feasible, and remaining areas would remain ecologically connected. Offset obligations for both direct and indirect impacts total 465 ecosystem credits, which will be satisfied in accordance with the NSW Biodiversity Offsets Scheme. This may include the establishment of a Biodiversity Stewardship Site on adjacent land, purchase of credits from existing sites, or contribution to the Biodiversity Conservation Fund (see Section 6.7.5.4 of the EIS).

Mitigation measures—including dust suppression, progressive rehabilitation, and biodiversity monitoring—are outlined in Section 6.7.5 of the EIS. These measures are designed to minimise further degradation and ensure the long-term conservation of Box-Gum Woodland within and surrounding the Project Site.

Representative Comment(s)

Additionally, the environmental impacts of this project are unacceptable due to the proposed clearing of habitat...including the Small Purple-pea and Pale Pomaderris.

Laura Nuttal Member for Brindabella, Submission No. SE-95037215, Canberra

This will impact detrimentally on the 320 species that it supports including many listed as threatened such as the Small Purple Pea Swainsona recta, Silky Pea Swainsona serica, Pale Pomaderris

Royalla Landcare, Submission No. SE-95028960, Royalla

Response

Feedback from the CPHR regarding the Pale Pomaderris (*Pomaderris pallida*) included the following comment.

CPHR consider that it is unlikely that the project will lead to Serious and Irreversible Impacts

CPHR has requested further assessment of the Small Purple-pea (*Swainsona recta*) which is discussed in Section 3.3.6 and 4.1.3 with further detailed SAII assessment presented in Appendix L of the BDAR (Capital Ecology, 2026). The assessment concluded that while the Project would directly impact 10 plants (0.5ha of habitat) for the construction of the rail overbridge, the management of indirect impacts would limit impact risks to remaining plants. The Small Purple-pea Management Plan (Appendix M of the BDAR), would guide the avoidance of potential indirect impacts and proposed monitoring over the life of the Project.

Offset obligations for threatened flora species have been calculated using the BAM Calculator and are detailed in Section 3.5.2 of the BDAR (Capital Ecology, 2026). Biodiversity offsetting obligations for the Project include the following species credits for threatened flora.

- 18 species credits for Small Purple-pea.
- 34 species credits for Pale Pomaderris.
- 76 species credits for Silky Swainson-pea.

These credits would be satisfied in accordance with the NSW Biodiversity Offsets Scheme, which may include establishing a Biodiversity Stewardship Site on adjacent land, purchasing credits from existing sites in the Monaro / Murrumbateman IBRA subregions or paying into the Biodiversity Conservation Fund (see Section 3.5.2 of the BDAR).

In addition to offsetting, the Project would implement staged clearing protocols, pre-clearance surveys, and annual biodiversity monitoring to track the condition of retained habitat and the presence of threatened flora. These measures are designed to ensure that residual impacts are transparently assessed, mitigated where practical, and offset in accordance with legislative requirements.

Representative Comment(s)

*I am writing as a concerned community member regarding the potential impacts of the proposed Monaro Rock Quarry on the endangered Swift Parrot (*Lathamus discolor*). This species is nationally significant, with fewer than 750 individuals thought to remain. It migrates through our region in autumn and winter, feeding on flowering eucalypts...The Swift Parrot is one of Australia's most threatened birds. Even though the site has no confirmed records so far, the habitat present means it is highly probable to be used by these nomadic, migratory parrots.*

Submission No. SE-95099710, Royalla

Response

The Swift Parrot (*Lathamus discolor*) is listed as critically endangered under the EPBC Act. While the species was not recorded during targeted surveys, the BDAR (Capital Ecology 2026) assessed the likelihood of occurrence based on habitat availability and regional records. The Project Site contains limited foraging habitat, and no breeding habitat was identified. The species was therefore assessed as having a low likelihood of occurrence, and no significant impact was predicted.

Representative Comment(s)

Endangered and Vulnerable Species

Pink-tailed Legless Lizard (Aprasia parapulchella): This is a vulnerable reptile species known to inhabit the rocky areas of the region. While the EIS claims no individuals were detected within the immediate disturbance area of the quarry, it is known to be in the wider area, and its habitat is at risk...

...Gang-gang Cockatoo (Callocephalon fimbriatum): This bird is listed as an endangered species. Surveys for the project identified suitable breeding habitat for the Gang-gang Cockatoo within the proposed disturbance area...

Swift Parrot (Lathamus discolor): This species is critically endangered and is mentioned as a species that will likely be put under stress by the quarry.

Other vulnerable species and ecological communities mentioned in the reports for the broader region include the Scarlet Robin, Varied Sittella, and the Dusky Woodswallow. These species are also a concern given the potential habitat loss and fragmentation caused by the quarry development.

Submission No. SE-95099710, Royalla

Response

The BDAR (Capital Ecology 2026) assessed all threatened fauna species with potential to occur within the Project Site, including the Pink-tailed Legless Lizard (*Aprasia parapulchella*), Gang-gang Cockatoo (*Callocephalon fimbriatum*), and Swift Parrot (*Lathamus discolor*). While no individuals were recorded during surveys, suitable habitat for the Pink-tailed Legless Lizard was identified. A total of 1,127 species credits will be retired to offset potential impacts to the Pink-tailed Legless Lizard habitat (see Section 3.5.2 of the BDAR)

For the Gang-gang Cockatoo, suitable foraging and potential breeding habitat was identified within the disturbance footprint. While no active hollows were recorded, the Project includes pre-clearance surveys, fauna rescue protocols, and the salvage of habitat features such as hollow-bearing trees (EIS Section 6.7.5.3). Habitat loss will be offset through ecosystem credits, and retained vegetation would be managed to support ongoing habitat function.

Other species of conservation concern, including the Scarlet Robin, Varied Sittella, and Dusky Woodswallow, were assessed in the BDAR and determined to have low to moderate likelihood of occurrence. The Project's biodiversity offset strategy and management measures are designed to address cumulative habitat loss and maintain landscape-scale connectivity for these and other woodland-dependent species.

Invertebrates

Representative Comment(s)

The ecosystems to be cleared, leads to detrimental impacts to our...Key's Matchstick Grasshopper...

Submission No. SE- 94662707, Gilmore

The project would clear 77.83 hectares of native vegetation, including 22.44 hectares of critically endangered Box Gum Grassy Woodland, protected under NSW and Commonwealth legislation. The site also provides habitat for threatened species, including...Key's Matchstick Grasshopper - 2.35 ha...

Submission No. SE- 94819466, Googong

I am deeply concerned by the EIS' finding that "there are likely to be significant impacts to Commonwealth-listed...Key's Matchstick Grasshopper habitat..."

Submission No. SE- 95073459, Conder

Response

Key's Matchstick Grasshopper (*Keyacris scurra*) is listed as endangered under the EPBC Act. The BDAR (Capital Ecology 2026) identified 2.37ha of potential habitat within the Project Site, primarily in PCT3375 Zone 1 and PCT3376 Zone 1. While the species was not recorded during surveys, the habitat was assessed as suitable, and a significant impact under the EPBC Act is considered possible. Accordingly, 93 species credits would be retired to offset residual impacts (see Section 3.5.2 of the BDAR). The Project's biodiversity offset strategy includes the potential establishment of a Biodiversity Stewardship Site on adjacent land, and all offsetting would be undertaken in accordance with the NSW Biodiversity Offsets Scheme (EIS Section 6.7.5.4).

4.2.5.4 Landscape Connectivity and Ecological Linkages

Representative Comment(s)

I am also greatly concerned about the fragmentation of the surrounding woodland, death by a thousand cuts. This property is uniquely positioned between the Melrose Nature Reserve & opposite Mt Rob Roy Reserve. It provides linkages through to other surrounding reserves Royalla TSR, Havelock, Devils Cnr, and Royalla Swainsona Reserve, Wandiyali & other crown & council owned land. This provides stepping stones through the remaining Box Gum Grassy Woodlands of which there is less than 5% left every bit is precious.

Submission No. SE-95055207, Royalla

The proposal actually suggests (Appendix F - Visual Impact Assessment) that will install a 3m high solid fence. The fence will be a barrier to the fauna moving from environment to environment blocking the natural roaming of our wildlife and to an extent the dispersal of natural flora. This is inconsistent with the environmental values and planning principles that underpin the Queanbeyan-Palerang region.

Submission No. SE-95105223, Royalla

Fragmentation – of the Box-Gum Grassy Woodland disrupting the existing corridors & connections to adjacent reserves in NSW & ACT including Melrose, Mt Rob Roy, Tuggeranong TSR, Royalla TSR, Royalla Swainsona Reserve, Havelock, Devils corner, Wandiyali, Beattie Hill, Mt Campbell, various nearby crown lands & council land set aside. The suggestion of erecting a 2km long colorbond fence will further fragment flora & fauna populations.

Royalla Landcare Inc Chair, Submission No. SE- 95028960, Royalla

Response

The BDAR acknowledges that “*the subject land is well connected to the surrounding landscape and likely forms part of an important connectivity corridor*” and that the Project holds potential to impact habitat connectivity (see Section 3.2.3.2 of Capital Ecology 2026). However, Capital Ecology conclude that the proposed development is considered unlikely to impact habitat connectivity for threatened species to the degree that it removes the ability of those species to move throughout the locality and/or isolates areas of habitat.

Capital Ecology (2026) determined that habitat connectivity within the Project Site is already partly compromised due to existing clearing and thinned canopy in the areas proposed for extraction and processing. While the 3m fence proposed for the Quarry Access Road may affect north-south movement, the adjacent southern landscape is heavily cleared and supports lower biodiversity, reducing the significance of this impact. Additionally, regional barriers such as the Monaro Highway, existing cleared agricultural land and Goulburn Bombala Rail Line already limit connectivity. Importantly, substantial areas of intact vegetation would remain to the north, east and west of the development footprint, which are expected to maintain functional movement corridors post-development.

Capital Ecology (2026) provided the following conclusion with respect to fauna movement.

the proposed development is therefore considered unlikely to have a prescribed biodiversity impact on the connectivity of different areas of habitat of threatened species that facilitates the movement of those species across their range.

4.2.5.5 Wildlife Displacement and Mortality

Representative Comment(s)

The nature of quarry operations will ensure that the project property will not be the only landholding affected as the entire area will transform into a hostile environment for all wildlife within an indeterminate but substantial radius of the project site and surrounds. No species of any description, capable of fleeing will remain anywhere near the project property due to the frequent blasting shock, constant noise created by processing machinery, the heavy amount of associated transport traffic on, into and out of the project site, and the expanding destruction of their habitat.

Submission No. SE-93636458, Royalla

Response

The BDAR (Capital Ecology, 2026) assessed potential impacts to fauna from indirect impacts including noise, vibration, and habitat loss. While some displacement is expected during construction and operation, the Project footprint was refined to avoid high-quality habitat and

maintain movement corridors. Mitigation measures include staged clearing, pre-clearance fauna surveys, and salvage of habitat features such as hollow-bearing trees. The Project also includes vegetated buffers and progressive rehabilitation to reduce edge effects and support recolonisation. These measures are designed to minimise wildlife displacement and maintain ecological function across the locality.

Representative Comment(s)

Old Cooma Road is identified by the NRMA as one of the most wildlife accident prone roads in NSW. There is a natural wildlife corridor along Jerrabomberra Creek which crosses Old Cooma Road. There will be a significant increase in wildlife fatalities with the addition of 500 daily heavy vehicle movements as kangaroos, wombats and deer cross the road, causing great danger to humans and animals.

Submission No. SE-94959957, Googong

Response

The EIS (Section 3.14.2) acknowledges increased traffic volumes associated with the Project and includes a Traffic Impact Assessment to evaluate safety risks. While wildlife-vehicle collisions are a broader regional issue, the Project will implement speed controls, signage, and driver awareness protocols to reduce collision risk. The BDAR (Capital Ecology, 2026) also assessed fauna movement corridors, including those associated with Jerrabomberra Creek, and the Project footprint was refined to avoid direct disturbance to these areas. Ongoing monitoring will track fauna activity and inform adaptive management if new risks emerge.

Representative Comment(s)

I am particularly concerned there is no mention anywhere in EIS what measures are proposed to mitigate the loss of individual wildlife & their homes including, Wombats, Sugar Gliders, Possums, Snakes, Pink tailed worm lizards, keys matchstick grasshoppers, woodland bird nests, frogs, turtles, water bugs & insects (not even surveyed) nesting water birds along with the hollow bearing trees are they to be bulldozed into oblivion? Are there going to be wildlife sweeps before each day of destruction?

Submission No. SE-95055207, Royalla

Response

The BDAR (Capital Ecology, 2026) included targeted surveys for threatened fauna species and habitat features, including hollow-bearing trees, rocky outcrops, and riparian zones (see Section 2.2 of the BDAR). Species such as the Pink-tailed Legless Lizard and Key's Matchstick Grasshopper were assessed and biodiversity offset obligations have been calculated accordingly (see Section 3.5.2 of the BDAR). While not all species listed in this submission were recorded or considered likely to occur, the Project would implement staged clearing protocols, pre-clearance fauna surveys, and salvage of habitat features to minimise direct mortality. These measures are outlined in the EIS (see Section 3.3 of the BDAR) and form part of the broader biodiversity management strategy.

Representative Comment(s)

Destruction of Box-Gum Woodland in the project site may result in more species moving to Tuggeranong Hill, creating higher demand for resources and more animals being hit by cars as they cross the Monaro Highway due to displacement from their habitat.

Submission No. SE-95073459, Conder

Response

The BDAR (Capital Ecology, 2026) assessed habitat connectivity and fauna movement across the landscape, including potential displacement effects. The Project footprint was refined to avoid high-quality Box-Gum Woodland and maintain movement corridors between retained vegetation patches (BDAR Section 5.4; EIS Section 6.7.5.2). While some displacement may occur, the remaining habitat is expected to be of sufficient size and configuration to support local fauna populations. The Project's biodiversity offset strategy includes long-term conservation of habitat in perpetuity, and adaptive management would be informed by ongoing ecological monitoring.

4.2.6 Blasting

4.2.6.1 Vibration

Representative Comment(s)

...blasting from the quarry will be felt in homes kilometres away. This will be insufferable. Again how will these vibrations affect our health and wellbeing...

Submission No. SE-95102457, Googong

I did not locate any studies on the potential vibration caused by drill and blast activities in the submission...Reviewing the geological map within the hydrogeological studies, it appears that the quarry is wholly contained within a hard rock volcanic unit that extends to the receptors (houses). In addition there are indications of east-west fault lines that could channel vibrations through hard rock caused by blasting towards these receptors.

Submission No. SE-93359457, Goulburn

Blasting, crushing, and truck movements will produce continuous noise and intermittent high-intensity vibration. Residents may experience:

- *Sleep disturbance.*
- *Stress and anxiety...*

Submission No. SE- 94631208, Royalla

Blasting on the sites will definitely be felt at our home...

Submission No. SE- 94655718, Conder

Response

Octave (2026) assessed the predicted ground vibration and airblast impacts associated with the Project in accordance with Australian Standard AS 2187.2:2006 *Explosives – Storage and use, Part 2: Use of explosives* (see Section 6.5 of the EIS). Using the largest planned Maximum Instantaneous Charge mass of 126kg, Octave (2026) concluded that blast vibration impacts at the closest receivers is predicted to comply with the relevant assessment criteria at all private residences (within NSW and the ACT).

All blasting undertaken for the Project would be designed to satisfy blast criteria with respect to ground vibration and airblast overpressure (see Section 6.5.3 of the EIS). All blasting would occur within the hours of 9:00am to 5:00pm Monday to Friday. No blasting is proposed to occur on Saturdays, Sundays or Public Holidays. Community members would have the opportunity to register for blasting notifications that would be sent prior to and on the day of the blast through email or text messages (depending on individual preference).

4.2.6.2 Structural

Representative Comment(s)

We consider that over time the explosions, vibration and seismic impact at the proposed quarry will damage the substructure in the area affecting the environment and the foundations of homes including our own.

Submission No. SE-92375707, Googong

Housing may not be designed to mitigate vibrations from blasting, leading to cracking in structures and potential damage to utilities such as gas lines, if the vibrations have not been assessed and may impact these areas.

Submission No. SE-93359457, Goulburn

My house is close to the quarry, and is built on a rock seam, so I am expecting a lot more seismic activity during blasting and potential house damage occurring, so I am sure that I will be in a dispute about damages, and I am also sure that this process will drag out while waiting for some compensation.

I will have a property inspection done of my house if the proposal goes ahead (in consultation with Monaro Rock) and then we will see what damage is done as blasting occurs, I will also have a seismometer on my property to monitor vibrations.

Submission No. SE-93573209, Royalla

there are unanswered questions about compensation for future damage to dwellings caused by quarry blasting

Submission No. SE-93864708, Burra

Response

Concerns regarding structural damage from quarry blasting have been addressed through detailed assessment presented in the Noise and Vibration Impact Assessment prepared by Octave (2026). The assessment applied criteria from AS 2187.2 and the ANZEC Blast Guidelines, which set

conservative thresholds for human comfort and cosmetic building damage. Predicted ground vibration and airblast levels at all nearby sensitive receivers are expected to remain well below these thresholds.

Specifically, airblast levels are predicted to be less than 115dBL at the closest residence, noting that airblast outcomes below 133dBL do not cause cosmetic damage based on observations made in Australian and international studies.. Ground vibration levels are also expected to comply with the 5mm/s peak particle velocity limit for structural integrity. Octave (2026) concluded that the proposed blasting operations are unlikely to cause damage to dwellings or underground utilities.

The Applicant would implement a Blast Management Plan, including measures for pre-blast notifications and blast monitoring (see Section 6.5 of the EIS). Any exceedance of criteria would be treated as an incident and investigated in consultation with relevant authorities. It is common for conditions of consent to provide for landowners within 2km of the Extraction Area to request an inspection to establish the baseline condition of any buildings or structures on their land. The Applicant would be comfortable to address any requests in accordance with such a condition (should it be included the development consent for the Project).

4.2.7 Bushfire

Representative Comment(s)

The proposed quarry is in a bushfire zone. We are concerned about activity there compounding bushfire risks (trucks and operations sparking fires) and that the silica dust will mix with bushfire smoke and dust prevalent in the area during summer.

Submission No. SE-92375707, Googong

Royalla is in a bushfire prone area & I am concerned this industrial site is storing 37,000litres of diesel fuel & other associated chemicals. There has been no mention of what fire mitigation measures are proposed.

Submission No. SE-94996459, Royalla

The Fuel & chemical storage on site is too great a risk for the surrounding woodland, waterways & population. Storage leaking, accidental spills, the risk of bush fire are all too real.

Submission No. SE-95055207, Royalla

Response

A bush fire assessment was included in Section 6.14.2 of the EIS and was prepared in accordance with “Planning for Bush Fire Protection” (Rural Fire Service (RFS), 2019), applying the documented methods for identifying potential bush fire hazards.

Table 4.2 presents the proposed bush fire management and mitigation measures, which include general bush fire management measures, along with targeted controls and safeguards for identified ignition sources.

Table 4.2
Bushfire Hazard – Activities and Controls

Activity	Possible Ignition Source	Safeguards and/or Controls
Refuelling	Spilt fuel or dry grass ignited by spark.	- Refuelling undertaken within cleared areas of the Project Site. - Engines in all vehicles to be turned off during refuelling. - No smoking policy to be enforced in designated areas of the Project Site. - Fire extinguishers maintained within all site vehicles and mobile earthmoving equipment.
General Activities	Cigarettes, Rubbish, e.g. glass, metal.	- No smoking policy to be enforced in designated areas of the Project Site. - No throwing cigarette butts from product trucks along the Quarry Access Road. - Focus on housekeeping to be maintained by the Quarry Manager. - Water cart available for firefighting purposes. - All site vehicles and mobile earthmoving equipment to carry a fire extinguisher.

Diesel fuel is the only potentially hazardous material that would be transported to and stored within the Project Site. Controls and safeguards would be implemented to minimise the potential for contamination, outlined in Section 6.14.3 of the EIS. Refuelling has been identified as a bush fire ignition source and mitigation measures would be applied (see **Table 4.2**).

Bushfire hazards associated with the Project would be considered acceptable with the implementation of the proposed safeguards and controls outlined in the EIS. The Project would not significantly contribute to raising the risk of bushfires impacting the community, property or environmental assets.

4.2.8 Cumulative Impacts

Representative Comment(s)

The cumulative impact of dust, noise, and traffic from multiple quarries is already being felt by residents, and this proposal would only exacerbate the problem.

Submission No. SE-93099457, Royalla

Cumulative impacts with existing quarries amplify dust, noise, traffic, and environmental effects, which have not been fully accounted for.

Submission No. SE-93255961, Royalla

The EIS did not model multi-source cumulative quarry emissions under realistic, worst-case meteorology and activity scenarios.

Submission No. SE-93704979, Googong

The EIS also fails to properly acknowledge and address the fact that there are already four other quarries within a 30km distance and the cumulative environmental impacts associated with those quarries, including dust, noise and vibration, and water quality...

Instead, the EIS simply asserts that the nearby quarries to the north (Cooma Road Quarry and Mugga (Symonston) Quarry) and that to the south (Williamsdale Quarry) are not close enough to result in discernible cumulative amenity impacts. In our client's experience, however, the combined effects of multiple quarries in close proximity can have significant and lasting impacts on the local environment and community amenity, and these should be properly assessed as part of the approval process.

Submission No. SE-95064459, Sydney

Response

Section 7.5 of the EIS described in detail the nature of cumulative impact risks assessed for the Project. This includes impacts in both the NSW and ACT as well as consideration of risks from existing impact sources, including existing quarries. Impacts associated with existing quarry operations would not be exacerbated or cross any regulatory thresholds due to the presence of the Project. The assessments have demonstrated that on a cumulative basis impacts would be acceptable as follows.

- Air quality impacts have been considered for residences in NSW and within the ACT demonstrating that all outcomes would be acceptable.
- Greenhouse gas emissions have been assessed for the Project as a whole, taking into account quarrying operations as well as product transport that would occur with the ACT and NSW.
- Human health risks have been considered at privately-owned residences in NSW and the ACT and are predicted to be low and acceptable.
- Noise-related impacts may be experienced with NSW and the ACT and assessment has demonstrated that construction and operational noise would be managed over the life of the Project.
- Blasting risks associated with airblast overpressure, vibration and flyrock would also be suitable with private residences in both NSW and the ACT considered for assessment. Airplanes approaching Canberra Airport would not be at risk from flyrock based on the outcomes of assessment.
- Biodiversity impacts would occur in NSW and the ACT. The BDAR (Capital Ecology, 2026) has considered the cumulative outcome with regards to assessment in both NSW and the ACT and concluded that impact outcomes have been thoroughly assessed in both locations and the cumulative impacts would not exceed any thresholds or introduce new types of impacts not previously considered.
- Aboriginal heritage impacts have been assessed in NSW and the ACT and while there are sites in both areas, the impacts would remain consistent in both regions and would not represent a significant impact to Aboriginal cultural heritage values.

- A single historic heritage site has been identified in the ACT that comprised rubble considered to have been present from railway construction. The site does not represent a significant site that warrants inclusion on a heritage register. There were no historic heritage sites identified in NSW.
- Project traffic would enter the public road network predominantly in the ACT at a dedicated intersection with the Monaro Highway. Potential transport risks are considered acceptable, and the ACT government has provided preliminary support for the proposed intersection configuration. Limited traffic would be generated during site establishment on local roads within NSW including Mates Drive, Monaro Station Road and Old Cooma Road. Traffic safety risks for the Project as whole would be managed through a Transport Management Plan and Drivers Code of Conduct.
- Water would be sourced predominantly from rainfall runoff and groundwater collected within the Project Site. Water resources are located at the Project Site, but their management may have impacts in the ACT as drawdown may be experienced across the border and any water that leaves the Project Site would eventually enter the ACT through Tuggeranong Creek, Jerrabomberra Creek or Guises Creek. Potential impacts to water resources in NSW and the ACT would be managed over the life of the Project and monitoring would be undertaken to demonstrate management has been successful and outcomes are consistent with assessment predictions.
- Bush fire risks existing within NSW and the ACT and would be managed across all aspects of the Project Site. The management of hazardous materials also has the potential to cause impacts in NSW and the ACT through ignited fires or contamination. Risks from hazardous materials would be managed of the life of the Project.
- Economic outcomes for the Project would be experienced equally in NSW and the ACT as employment opportunities and supplier benefits may occur across both regions.
- Social impacts may be experienced in the Area of Social Influence that encompasses part of the suburbs of Royalla, Fernleigh Park, Googong and Tuggeranong. Social amenity impacts are most likely to be experience closest to the Project Site, but these includes aspects of transportation outcomes as well as noise, dust and visual amenity outcomes that may be experienced in a number of locations.

4.2.9 Economic Impacts

4.2.9.1 Local Jobs

Representative Comment(s)

The proposed 30 jobs and access to additional rock do not justify the massive health, safety, and environmental costs. The primary financial benefit goes to the quarry operators, not to our community.

Submission No. SE-93182958, Gordon

The predicted benefit of jobs/employment is disingenuous. Skilled employees will most likely be bought in from elsewhere.

Submission No. SE-93867457, Royalla

Response

An Economic Impact Assessment was prepared by Gillespie Economics (hereafter referred to as Gillespie, 2025 - EIS Appendix M). Section 6.15.2 of the EIS presents that Gillespie (2025) was undertaken in accordance with:

- Clause 7(1)(f) of Schedule 2 of the EP&A Regulation which requires environmental impact statements to provide “*the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations...*”. The Note to Clause 7(1)(f) provides as follows. “*A cost benefit analysis may be submitted or referred to in the reasons justifying the carrying out of the development, activity or infrastructure.*”
- Economic aspects of Section 4.15 of the EP&A Act which requires the following matters to be taken into consideration.
 - The public interest (taken as the collective public interest of households in NSW).
 - The likely impacts of the development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.
- The NSW Treasury (2017) *NSW Government Guide to Cost-Benefit Analysis*.

Gillespie (2025) included a cost-benefit analysis, determining whether the state would be economically better off ‘with’ the Project compared to ‘without’ it. The Project is expected to deliver a net economic benefit of approximately \$41 million to NSW. Most environmental and social impacts are addressed through mitigation or offset measures. Residual impacts are minimal, with the only quantified external cost the greenhouse gas emissions over the life of the Project. The analysis concludes that the Project is economically efficient and would contribute positively to the State’s overall welfare.

A local effects analysis examined local (Queanbeyan-Palerang LGA) economic outcomes and identified economic benefits including job creation, wage retention, and supplier spending. It also confirms that there are no significant adverse impacts on housing, wages, or infrastructure.

Gillespie (2025) identifies the economic benefits to the State of NSW and local region. The impact of these local benefits is highlighted on one of the supporting submissions (Submission No. SE-93421971 from Googong) that stated the following.

The quarry will directly create multiple new jobs and provide flow-on benefits through local businesses that support the project. Both companies behind this proposal have a proven track record of employing local people and contributing to our community. Their ongoing success translates directly into stronger employment outcomes, economic stability, and greater opportunities for families across Queanbeyan-Palerang and the wider ACT region.

4.2.9.2 Community Benefits and Costs

Representative Comment(s)

.....there is no clear commitment to meaningful local community offsets, long-term environmental rehabilitation funds, or binding compensation mechanisms for affected households.

Submission No. SE-95026709, Googong

There seems to be a lot of cons to this project for the community but not a lot of benefit. I don't understand why this project is even being consider for the benefit so few.

Submission No. SE-93320957, Royalla

The developers should offer residents the option of compensation at the current market value to reflect the disruption and devaluation caused by the project, and allow residents to relocate if desired due to the associated health risks.

Submission No. SE-95103994, Royalla

Response

The Applicant recognises the importance of maximising the projected economic benefits to the local area, while minimising the environmental impacts of the Project. As a result, negotiations have commenced with Council to establish a Planning Agreement (Section 2.6 of the EIS). The Planning Agreement would include the payment of a 12.5c/t contribution to be managed by Council for distribution as follows.

- Contributions towards projects established by Community Management Committees established under Section 355 of the *Local Government Act 1993*. It is expected that these groups would be focused on local community halls and support or sponsor events or projects managed by committees associated with each hall.
- The funding would be directed to Community Management Committees located in Royalla, Fernleigh Park and Googong.
- Contributions to a community fund for support of community led projects that may include local environmental regeneration projects such as those managed by local Landcare groups.
- Procedures for implementation of the above.

Direct compensation to residents/affected households has not been triggered under the *Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Developments* (VLAMP) (NSW Government, 2018), meaning that voluntary land acquisition is not a requirement of the Project.

In regard to environmental rehabilitation funds, as required under expected conditions of consent, the Applicant would lodge a security deposit with DPHI that covers the Quarry's full rehabilitation costs in the unanticipated event that the Applicant defaults on its rehabilitation commitments.

Representative Comment(s)

there is a real possibility of additional costs to implement extra filtration measures to our drinking water and the air within our homes.

Submission No. SE-94971209, Googong

The addition of the 500 heavy vehicle movements plus the quarry construction equipment to these dual-lane rural roads will further degrade these roads and require further council maintenance and expenditure which has not been captured in the project's cost benefit analysis. This will then further force up council rates for all the ratepayers in the region, throughout the proposed 30 year lifespan of the site.

Submission No. SE-95117457, Burra

Response

Implementation of extra filtration measures within resident's homes for drinking water and air quality would not be necessary. Contamination of drinking water is not anticipated and is addressed further in Section 4.2.12.4 of this report. The Project is predicted to comply with all impact assessment criteria for annual average concentrations of TSP, PM_{2.5}, PM₁₀, Odour, RCS and deposited dust with the implementation of the standard mitigation measures.

As stated in Section 5.6.4 of Gillespie (2025)

'The Project will fully fund any demand it has for local infrastructure and services for the production process e.g. an intersection'.

The Applicant would make further monetary contributions to Council, as discussed above. Heavy vehicles would rarely utilise local roads, with the Quarry Access Road proposed to access the Monaro Highway. Overall, it is considered that the proposed transportation activities of the Project would remain within the capacity of the road network

4.2.10 Electricity Reliability

Representative Comment(s)

The project's substantial energy demand places an unnecessary burden on the local grid for no community benefit, contradicting NSW's goals for sustainable energy use.

Submission No. SE-94318249, Royalla

We have 3 phase equipment along with our other appliances. These can be damaged when there are surges in the supply. If you have to claim on insurance, our policy amount will increase especially if there are many claims going through in the area.

Submission No. SE-94603707, Royalla

The proponent proposes to connect electricity into the existing 11kV power supply. There is no consideration of the project on the load/capacity to service not only the development but the surrounding estate.

Submission No. SE-94972209, Gilmore

The extra electricity required by the new quarry, without any infrastructure upgrades worries me as I have already been impacted by local surges and voltage swings. We can't afford the constant increases in insurance premiums to cover the possibility that we will incur more frequent voltage swings when the quarry takes more electricity from the grid.

Submission No. SE-95110958, Royalla

Response

As described in Section 3.11.2 of the EIS, the Project Site would be powered via private powerlines that would connect to an existing 11kV supply located adjacent to Old Cooma Road and via Mates Drive. A connection application enquiry has been submitted to Essential Energy and the capacity for power supply confirm (subject to improvements not related the Project).

4.2.11 Greenhouse Gas Emissions

Representative Comment(s)

The quarry will require significant electrical infrastructure to power crushing equipment, lighting, and water pumps. This contributes to a high carbon footprint inconsistent with NSW's climate goals.

Submission No. SE-94968725, Royalla

Regarding greenhouse gas emissions, the EIS states that the Project's direct emissions are likely to be approximately 19,531t CO₂-e per annum. This is a significant impact that is not meaningfully addressed in the EIS or supporting material, other than a general commitment by MRPL to investigate ways to minimise emissions.

Submission No. SE-95064459, Sydney

I also believe that the carbon emissions that come from this quarry will be significant - and in a country that has signed onto the Paris Climate agreement, and has a legislative aim of net zero carbon emissions by 2050, I do not believe that any infrastructure development should be going ahead without full carbon offset.

Submission No. SE-95121720, Royalla

Response

Greenhouse Gas (GHG) emissions from the Project were comprehensively assessed in EIS Section 6.3 and are presented in the AQIA (Northstar, 2026). The assessment, prepared by Northstar (2026) considered emissions in three ‘scopes’ in line with the *Australian National Greenhouse Accounts Factors 2024* (DCCEEW, 2024) and the *Greenhouse Gas Protocol* (WRI, 2004). Emissions were categorised across all three scopes:

- Scope 1 (Direct emissions): includes diesel combustion from on-site mobile equipment, asphalt production, and material transport under the Applicant’s operational control.
- Scope 2 (Indirect emissions): Covers electricity consumption at the Project Site, including administration and concrete batching facilities.
- Scope 3 (Other indirect emissions): Includes upstream fuel production, employee commuting, and downstream electricity-related emissions.

Based on the activity data for the operation of the Project and the emissions factors outlined in Table 6.15 of the EIS, annual GHG emissions were calculated by Northstar (2026) and are presented in **Table 4.3**.

Table 4.3
Calculated Project GHG Emissions

Scope		Activity Rate	Units	Energy Content	Units	Emission Factor		Emissions CO ₂ -e (t·yr ⁻¹)
1	Diesel fuel in plant and machinery on site	1,200	kL·yr ⁻¹	38.6	GJ·kL ⁻¹	70.2	kg CO ₂ -e·GJ ⁻¹	3,251.7
	Material transport	5,438						14,735.5
	Diesel fuel in plant and machinery at asphalt batching plant	570						1,544.5
Scope 1 (subtotal)								19,531.7
2	Electricity consumption	218,750	kWh·yr ⁻¹	-	-	0.66	kg CO ₂ -e·kWh ⁻¹	144.4
Scope 2 (subtotal)								144.4
3	Diesel fuel in plant and machinery on site	1,200	kL·yr ⁻¹	38.6	GJ·kL ⁻¹	17.3	kg CO ₂ -e·GJ ⁻¹	801.3
	Material transport	5,438						3,631.4
	Diesel fuel in plant and machinery at asphalt batching plant	570						380.6
	Employee travel	42.9		34.2				17.2
	Electricity consumption	218,750	kWh·yr ⁻¹	-	-	0.04	kg CO ₂ -e·kWh ⁻¹	8.8
Scope 3 (subtotal)								4,847.3
Source: Northstar (2026) Table 38								

Total GHG emissions from the Project are predicted to be minimal and make only minor contributions to the total GHG emissions for NSW and Australia. Direct (Scope 1) emissions would contribute 19,531.7t CO₂-e per annum, accounting for less than 0.002% of 2022 NSW total GHG emissions and less than 0.005% of 2022 Australian total GHG emissions. Similarly, indirect ‘Scope 2 and Scope 3’ emissions would contribute a total of 4,991.7t CO₂-e per annum, representing 0.004% of 2022 NSW total GHG emissions and less than 0.001% of 2022 Australian total GHG emissions.

GHG mitigation would be regulated by the NSW EPA. The Applicant agrees to consider measures to avoid emission generation where feasible and where this is not possible to mitigate emission generation. This may include the use of solar power at the Project, the shift from diesel power generation to grid supply or the purchase of 'green' electricity through grid supply.

While the Project's emissions are considered minor in the national context, the Applicant has committed to implementing mitigation measures to reduce emissions where feasible. These include:

- Turning off vehicles, plant, and machinery when not in use
- Regular servicing and tyre pressure optimisation
- Designing truck routes and loading capacity to reduce distance and effort
- Maintaining roads in good condition to avoid meandering
- Reducing gradients around site where feasible
- Using B5 fuel in plant and equipment where possible

Comment

In line with Australia's climate change strategies and commitments, a renewable energy source at the site would help to compensate for industrial greenhouse gas emissions. Upon completion of the project, such a facility could revert to the local community to support a decentralised power network.

Submission No. SE-95018474, Queanbeyan

Response

GHG emissions associated with the Project have been quantified and assessed as described above. A range of measures would also be implemented to minimise GHG emissions throughout the life of the Project.

The feasibility of establishing renewable energy infrastructure at the Project Site, including its potential ongoing use following completion of quarrying activities, may be considered as part of future Project and rehabilitation planning. However, no renewable energy generation facility currently forms part of the Project.

4.2.12 Groundwater

4.2.12.1 Usage and Availability

Representative Comment(s)

I am concerned the quarry's use of the available groundwater will cause my bore to run dry, impacting my ability to provide water for care of my animals, gardens and to provide fire protection.

Submission No. SE-93232707, Royalla

According to one local expert who specialises in servicing bore pumps and equipment, with an intricate knowledge of the situation in our district has publicly stated that the water table has dropped 17 metres in the time he has been working locally over 22 years. He has stated that this has resulted in a drop in yield of approximately 25% at his own bore site.

We, and many others, depend on groundwater as a necessary source for our stock animals and critically essential static water supply for fire protection.

Submission No. SE-93636458, Royalla

The proposed quarry would extract up to 42.4 million litres of water per year from the groundwater table. This is an unsustainable volume for a rural and conservation area and risks lowering groundwater levels, drying out creeks, and reducing water security for residents, farmers, and ecosystems. Once the water table is depleted or damaged, recovery is uncertain and may cause irreversible harm to our local environment and community.

Submission No. SE-93671223, Royalla

The possibility of adding a quarry to these ongoing water supply issues has residents concerned about how they will water their livestock and gardens, or maintain a normal water supply for home use like washing cars or homes, let alone plan for times of drought and bushfire

Submission No. SE-95121958, Royalla

Response

The potential impacts of the Project on groundwater availability have been comprehensively assessed by Hydrogeologist (2025) in the GIA (Appendix L of the EIS). Hydrogeologist (2025) developed a calibrated numerical groundwater model to simulate drawdown and inflow over the life of the Project, including conservative assumptions to account for uncertainty. The groundwater model was peer reviewed by Manewell Groundwater (Appendix D of the GIA). The peer review concluded that:

“the model is indeed usable, reliable and feasible in accordance with the IESC uncertainty note criteria”.

Peak cumulative rate for groundwater inflow and bore extraction is predicted to be 42.4ML/year in Year 16 of operations, comprising inflow to the extraction area and abstraction from a production bore (see Section 6.13.7 of the EIS). This volume represents less than 0.02% of the annual extraction limit for the Lachlan Fold Belt MDB Groundwater Source (253,788ML/year). Groundwater inflows are not expected until stage E4 of extraction, when the quarry floor intersects the water table. Prior to this, no dewatering is required. Drawdown modelling indicates that two registered bores GW402921 and GW402076 may experience 1m and 2m of drawdown, respectively. These bores are located approximately 1.5-2km from the extraction area and are used for stock, domestic, and irrigation purposes. The modelled drawdown is considered conservative and within the NSW Aquifer Interference Policy’s Minimal Impact Considerations for less productive aquifers.

Hydrogeologist (2025) identified the potential for aquifer drawdown to exceed the NSW Aquifer Interference Policy’s Minimal Impact Considerations threshold (2m) at one registered private bore. However, an uncertainty analysis determined this prediction to be conservative and unlikely to occur. Regardless, should access be granted, the Applicant would monitor water levels in the

bore and if impacts from the Project are identified, make good provisions would be triggered. The make good provisions available to the landowner would be agreed in consultation, however options for make good would be described in the Groundwater Management Plan for the operation.

Impacts to groundwater dependent ecosystems are not expected and there would be no change to groundwater quality or the beneficial use category of the groundwater source beyond 40m from the Project Site. A Groundwater Management Plan will be implemented, including monitoring, reactive protocols, and make-good provisions. The Applicant would continue to monitor the groundwater levels and quality within the Quarry's existing groundwater monitoring bore network on a monthly basis over an initial 12-month period to establish baseline groundwater quality and assess any seasonal effects. Groundwater take would be quantified by metering the groundwater supply bore. With these safeguards, the Project poses a low risk to surrounding groundwater systems (Hydrogeologist 2025).

4.2.12.2 Contamination

Representative Comment(s)

Runoff and groundwater disruption from the quarry risk long-term contamination of Canberra's drinking water catchment.

Submission No. SE-93182958, Gordon

Drawdown and contamination risks are significant, especially in a drying climate.

Submission No. SE-95057717, Royalla

Response

Hydrogeologist (2025) determined that due to the inert characteristics of the host rock and the generally fresh to brackish salinity of the groundwaters, the potential risk of groundwater contamination from Project activities is considered low (Section 6.4.5 of Hydrogeologist, 2025). Primary risks associated with potential hydrocarbon contamination during operational activities (e.g. machinery leaks, refuelling spills) can be greatly reduced through the implementation of a site management plan for handling hydrocarbons (Hydrogeologist, 2025). All chemicals and hydrocarbons would be stored in accordance with manufacturer's specifications or the relevant Australian Standard to prevent contamination of groundwater.

Any change in groundwater quality associated with the Project is expected to be negligible and is not predicted to lower the beneficial use category of the groundwater. The Project, therefore, does not exceed the groundwater quality requirement for the minimal impact considerations for aquifer interference activities (Hydrogeologist, 2025).

4.2.13 Human Health

4.2.13.1 Silica Dust and Respiratory Health

Representative Comment(s)

that even though the proposal suggest that the company can manage and monitor the air quality including the silica dust, science is conclusive that no amount of silica dust can be considered safe for humans therefore how can this be acceptable in close proximity to residential areas.

Submission No. SE-94539216, Royalla

The rock material to be quarried is known to contain high levels of silica. Activities such as drilling, crushing, and screening release fine RCS dust into the atmosphere. Inhalation of these particles has been definitively linked to silicosis, lung cancer, and other chronic respiratory illnesses.

Submission No. SE-94851208, Gordon

This project will release ultrafine dust, silica particles, and other known carcinogens. Tuggeranong already faces elevated asthma and respiratory illness rates from winter woodfire smoke and bushfire seasons. Adding quarry emissions will worsen community health, especially for children, the elderly, and vulnerable groups.

Submission No. SE-93182958, Gordon

I am a chronic asthma sufferer and will not be able to tolerate airborne toxic silica dust blown from the quarry onto my property on a daily basis. The health risks from breathing silica dust daily will add an extra burden on my health and the medical system in general as I am sure I am not alone in Royalla suffering from asthma.

Submission No. SE-94309458, Royalla

The rock material to be quarried is known to contain high levels of silica. Activities such as drilling, crushing, and screening release fine RCS dust into the atmosphere. Inhalation of these particles has been definitively linked to silicosis, lung cancer, and other chronic respiratory illnesses.

Clean Air Canberra
Submission No. SE-94851208, Gordon

Response

The AQIA (Northstar, 2026) considered the composition of predicted particulate concentrations, and specifically risks associated with potential respirable crystalline silica (RCS) exposure was assessed on an annual average basis. RCS was conservatively assumed to comprise 40% of total dust (based on quartz content) and is predicted to be well below the nominated criterion. The maximum predicted annual average incremental RCS concentration at any modelled receptor was $0.24\mu\text{g}/\text{m}^3$ (as PM_{10}), compared with a criterion of $3\mu\text{g}/\text{m}^3$ assumed from South Australian guidance. This indicates that even for this higher-specificity particulate constituent, predicted concentrations remain comfortably within the relevant health-based benchmark.

A comprehensive Human Health Risk Assessment (HHRA) prepared by Environmental Risk Sciences Pty Ltd (EnRisks, 2025) was presented as Appendix C of the EIS and relied upon the air quality modelling outcomes presented in the AQIA. The HHRA was conducted in accordance with the relevant National protocols/guidelines (outlined in Section 1.3 of the HHRA). EnRisks (2025) acknowledges the potential for particulate matter to cause adverse health effects, however, state that this is dependent on particle size and composition (the materials the particles are made up of e.g. RCS).

EnRisks (2025) noted that the predicted maximum incremental RCS exposure from the Project ($0.1\mu\text{g}/\text{m}^3$) is 20 times below the Texas Commission on Environmental Quality (TCEQ) guideline for silicosis when assuming 100% of $\text{PM}_{2.5}$ is RCS and 75 times below when assuming 40% of $\text{PM}_{2.5}$ is RCS. For lung cancer, the predicted RCS exposure remains 2 to 3 times below the TCEQ guideline of $0.29\mu\text{g}/\text{m}^3$. The ‘incremental’ result includes both the amount of particulate matter produced from the Quarry and background air quality. EnRisks (2025) considered the community profile, including existing community health, in their assessment.

EnRisks (2025) concludes that:

‘health risks to residents in existing properties in the vicinity of the proposed Quarry due to activities that may generate dust are low and acceptable in line with guidance from national health authorities (enHealth 2012). In Fact...there will be no discernible changes to existing air quality during operations at this facility when the relevant dust control measures are incorporated’.

Representative Comment(s)

PM1 particles (not discussed by this study) penetrate deeper into lung (alveola region) and has to elevated toxicity due to the increasing surface area as particle size decreases. This is linked to accelerated silicosis, COPD lung cancer and other systemic effects. Silica dust of this size which is not covered by the impact study will typically travel up to 20kms.

Submission No. SE-94971209, Googong

that even though the proposal suggest that the company can manage and monitor the air quality including the silica dust, science is conclusive that no amount of silica dust can be considered safe for humans therefore how can this be acceptable in close proximity to residential areas.

Submission No. SE-94539216, Royalla

My father-in-law has been diagnosed with terminal silicosis and I do not wish any further family members to suffer the same fate. There is no safe exposure to silica dust as it only takes one instance of exposure, in the same way as asbestosis.

Submission No. SE-95117457, Burra

Response

PM_1 particles are considered and discussed in EnRisks (2025) and Northstar (2026). As discussed in Section 5.1 of the HHRA, $\text{PM}_{2.5}$ particles were assessed. $\text{PM}_{2.5}$ is defined as particulate matter below $2.5\mu\text{m}$ in diameter, meaning that PM_1 particles are included in this measurement. Measurement of just PM_1 particles and below is uncommon, as the equipment required is less reliable and there are no health-based guidelines for these fine particles on their own; whereas there are health-based guidelines for $\text{PM}_{2.5}$.

As discussed in Section 4 of the HHRA, key health authorities have adopted toxicity reference values, designed to protect humans from the effects of certain chemicals. Determining these values involves health authorities undergoing detailed reviews of what the most sensitive health effect is and what would be the most protective value. In regard to silica, this compound is naturally released to the environment through earth surface processes, meaning that background exposure to silica may occur. Silicosis may occur from exposure to silica dust, though this more commonly an occupational hazard and develops through cumulative exposure to RCS. Enrinks (2025) concluded that health risks to residents in existing properties nearby the proposed Quarry, caused by activities that may generate dust, are low and acceptable in line with guidance from national health authorities.

4.2.13.2 Mental Health

Representative Comment(s)

Mental health is already being affected. The stress of possibly living beside a loud, polluting, high-traffic quarry has caused sleeplessness, fear, and uncertainty for many in the community. We are being forced to live in a state of limbo, not knowing whether our peaceful lifestyle will be destroyed.

Submission No. SE-94679470, Royalla

Since finding out this information on what Monaro Rock plan to do I have suffered acute anxiety and mental health issues at even the thought of this going ahead knowing that no matter what they tell you or whoever makes these decisions my family will be breathing in silica dust and it will be going into our water tank into our garden even our animals will be breathing it in 6 days a week.

Submission No. SE-95102987, Royalla

Response

The Applicant recognise the stress and anxiety that some community members are experiencing around the Project. Uncertainty regarding the approval process, fear of impact to physical health and disruption of lifestyle are factors contributing to mental health impacts. It is possible that stress and anxiety is being exacerbated due to misinformation or lack of information surrounding the extent of the Project's impacts; however, the Applicant recognises that negative mental health impacts may continue to be felt even with accurate technical information provided. In fact, the Social Impact Assessment (SIA) conducted by Landscape Research (2025) and provided as Appendix N to the EIS) made the following conclusion in Section 7 of the report.

While technical assessments and risk analyses suggested that the residual impacts of the Monaro Rock Quarry are within acceptable thresholds based on regulatory benchmarks and cumulative impact modelling, the perception of risk and lived experience of local residents reflect a deeper social reality that diverges from the technical data.

The Applicant recognises the lack of community trust and is committed to a comprehensive and transparent approach to stakeholder engagement throughout the life of the Project. This includes the development and implementation of a Stakeholder and Community Engagement Strategy and Plan to promote openness, dialogue, reliable monitoring, and regular reporting.

As presented in Section 6.16.8 of the EIS, key components of the engagement framework include but are not limited to the following.

- Ongoing stakeholder engagement strategy, incorporating regular community meetings, project updates, and accessible feedback mechanisms to address concerns and inform adaptive management. An annual meeting would be held to provide updates and allow reflection on the Applicant's strategy, progress, and community impacts, with outcomes incorporated into the Project's Annual Review.
- Public reporting of key monitoring outcomes, including noise, dust, traffic, and amenity, to promote accountability and support trust-building. Measures of environmental and social performance would include quantifiable outcomes such as biodiversity mitigation, dust and noise reduction, and local reinvestment.
- Appointment of a nominated Project representative with authority and resources to act as the primary point of contact for community enquiries, concerns, and grievances.
- Notification protocol for key messages, including blast notifications and other operational updates, to ensure timely and consistent communication.

It is expected that as the Project progresses and demonstrates compliance with best practise standards, levels of anxiety and stress would decrease.

Representative Comment(s)

As a veteran of the Iraq campaign who has diagnosed PTSD as a result of being rocketed, I moved to the country for the serenity to assist in my recovery. I moved South of Canberra to avoid the Majura Training Area where explosions often occur on the High Explosive Range and I can still hear them from Royalla. Blasting from the Monaro Rock Quarry will be much larger and closer which will obviously be louder and have a greater impact on my life. I know there are a lot of local residents that have served or are still currently serving that this blasting would impact.

Submission No. SE-93320957, Royalla

I have children with autism who are highly sensitive to loud and unpredictable noises. Noise from trucks, rock crushing, concrete recycling, and blasting would cause them significant distress, impacting their mental health and daily quality of life.

Submission No. SE-94594709, Conder

Response

Blasting impacts were assessed in a Noise and Vibration Impact Assessment (NVIA – Octave, 2026). Octave (2026) determined that airblast (pressure waves consisting of audible and inaudible energy) overpressure levels will comply with human comfort criteria at all sensitive receivers. The Applicant acknowledges that, while within human comfort limits, this does not mean that blasting would not be heard by surrounding residents. As a result, community members would have the opportunity to register for blast email or phone notifications, which would be sent out prior to and on the day of the blast (see EIS Section 6.5.5.3). This may assist in alleviating the uncertainty around when blasting would occur. Blasting would be limited to once weekly at most, occurring only on weekdays between 9:00am and 5:00pm. A blast may need to be repeated on the rare case of a misfire.

Other noise generated from the project would satisfy regulated noise requirements and is addressed in further detail in Section 4.2.15.

4.2.13.3 Water Contamination

Representative Comment(s)

Quarry runoff and dust will not only impact tanks but will also enter local waterways and ultimately flow into Lake Tuggeranong. This contamination risks polluting our drinking water sources, damaging aquatic ecosystems, and creating long-term health risks for people, animals, and the broader community.

Submission No. SE-93701207, Royalla

The highly potential affect to our drinking water seems to have been, excuse the pun, largely washed over. Many of the residents rely on tank water. To then have this affected by the known dust stirred through quarry activity will not be mitigated by the quarry developers. Many of us, including myself, have young children with no access to town water supply. Are we for thirty years to install and maintain additional filtration in order to mitigate this increased risk of silica dust in our tanks.

Submission No. SE-95079958, Royalla

Response

Dust generated from the Project site would not contaminate tank water. As stated in Section 4.2.13 of this report, the Human Health Risk Assessment prepared by EnRisks (2025) concludes that:

‘health risks to residents in existing properties in the vicinity of the proposed Quarry due to activities that may generate dust are low and acceptable in line with guidance from national health authorities (enHealth 2012). In Fact...there will be no discernible changes to existing air quality during operations at this facility when the relevant dust control measures are incorporated’.

Dust control mitigation measures can be found in Section 6.2.6 and Section 6.2.7 of the EIS.

Advice from the NSW Government on water quality in water tanks indicates that the greatest risks of contamination are from microorganisms such as bacteria and parasites from bird or animal droppings or from roof or plumbing materials³. Advice on how to protect water quality in tanks is provided and includes maintenance of the tank and the installation of first flush systems. It should be noted that the Project would not be the only source of dust in the region and predicted dust dispersion at private residences caused by the Project is well below guideline levels set by the NSW EPA.

As stated in Section 6.12.4.1 of the EIS, a Water Management Strategy has been developed which would minimise the possibility of uncontrolled discharge of polluted water from the Quarry site. A Water Management Plan would be prepared and implemented prior to commencement of the Project that describes the Water Management Strategy and includes protocols for monitoring,

³ See the NSW Government website - [Rainwater tanks](#)

reporting and actions to be taken in response to a pollution incident (should it occur). An Erosion and Sediment Control Plan has also been prepared, supporting the management of clean and dirty water (SEEC, 23026).

4.2.14 Land Use, Zoning and Planning

Representative Comment(s)

I am concerned that land which has been zoned for a specific purpose can easily be re-zoned for other purposes if money is to be made or vested interests considered. I would have thought that declaring something as critically endangered would be enough in itself to prevent any destruction of the environment!

Submission No. SE-93370709, Royalla

In addition to the notion of quarrying rock and processing it adjacent to these residential areas, the zoning changes sought would allow the site to become a major manufacturing location for asphaltic and Portland cement concrete. These outcomes would be an even more egregious outcome.

Submission No. SE-93523965, Royalla

The land identified for this quarry is zoned RU2 and C2 (Rural and Conservation), which is intended to protect biodiversity, water catchments, and the rural character of the area. Approving a quarry in such a zone would undermine the intent of the planning framework and make a farce of the zoning laws that residents rely upon to protect their community and environment.

Submission No. SE-93671223, Royalla

There is no evidence that the necessary infrastructure upgrades have been planned or funded to support this development.

Submission No. SE-95038708, Royalla

Response

The matter of zoning objectives is comprehensively discussed in response to the Queanbeyan-Palerang Regional Council in Section 4.1.6. The Applicant believes that the Project has been planned and would be implemented consistent with the intention of the land use objectives specified for the land zones that apply to the property. This has occurred through planning and decision-making processes that were cognisant of the sensitivity and importance of remnant vegetation across the property. Section 2.8 of the EIS describes the consideration of alternatives for the Project and how areas of high biodiversity value were considered, alongside risks to community amenity. The zoning objectives are intended to guide decision-making for consent authorities and are not intended to discourage any development from occurring.

4.2.15 Noise

4.2.15.1 General

Representative Comment(s)

the noise level will drastically interrupt the ambiance of why many residents live here

Submission No. SE-92330707, Googong

The proponent has suggested that noise levels will be comparable to those of a domestic air-conditioner compressor. This claim is not credible. The scale and intensity of quarrying and associated recycling processes will inevitably result in intrusive, continuous noise that cannot be reconciled with the current amenity.

Submission No. SE-95103994, Royalla

noise pollution will be extensive, noise HOURS 5am to 6pm 6 days per week

Submission No. SE-95121958, Royalla

Response

The Applicant acknowledges that, while the Project would satisfy regulated noise requirements, the community could still hear or experience the effects of noise and blasting from time to time. The management of noise and blasting risks would occur over the life of the Project with regular monitoring published on the Company website and in annual reporting of the Project. Reference to noise levels being consistent with an air conditioning unit would be in relation to a standard chart of noise levels that indicate noise levels consistent with criteria levels established by the NSW EPA are generally consistent with background noise in the home, rainfall and other comparative activities. It is not to say that all noise would be experienced the same by all people, however is a reference for those seeking to understand how the quarry operation may be experienced.

The NVIA (Octave 2026) predicted that noise levels and vibration impacts generated as a result of the operation of the Quarry would comply with the relevant assessment criteria at all private residences (within NSW and the ACT). Construction of the Quarry Access Road and widening of the Secondary Access Road has the potential to exceed noise affected levels at some locations and, as a result, would be managed by employing appropriate construction noise management practises (see Section 3.3.2 and Section 17 of Octave, 2026).

4.2.15.2 Blasting

Representative Comment(s)

Noise / Blasting/ Vibration. The proposed quarry will decimate the silence of our rural lifestyle with explosions.

Submission No. SE-93436712, Royalla

Our experience with the Williamsdale Quarry is the hills surrounding Royalla are interconnected and thus noise and vibrations are clearly transmitted this rock layer. Every blast will be experienced by residences in and around the Quarry.

Submission No. SE-95078713, Royalla

Response

Blasting would be limited to once weekly at most, occurring only on weekdays between 9:00am and 5:00pm. A blast may need to be repeated on the rare case of a misfire.

Blasting impacts were assessed against human comfort criteria, obtained from Appendix J of the *Australian Standard AS 2187.2 – 2006 Explosives – Storage and use, Part 2: Use of Explosives* (Section 8 of Octave, 2026). Octave (2026) conclude that airblast overpressure levels will comply with human comfort criteria at all sensitive receivers.

The greatest peak pressure level is calculated as 115dBL at one location, meeting the maximum criteria level. Vibration impacts were found to comfortably comply to human comfort criteria of 5mm/s, with the worst-case typical vibration being 0.65mm/s with vibration ranging from 0.26mm/s to 2.59mm/s (see Section 15.1 of the NVIA Octave (2026)).

Noise impacts generated through extraction, processing, transport, construction and blasting would be mitigated. Noise management measures are outlined in Section 6.5.5 of the EIS. Specific blast management measures include:

- Preparation of a Blast Management Plan, containing operating protocols for all blasting activities.
- Blasting notifications to be sent out to registered community members prior to and on the day of the blast through email or text message (depending on preferences).

4.2.15.3 Operational Noise

Representative Comment(s)

Constant loud noises from heavy machinery can lead to hearing loss, tinnitus, and other hearing-related conditions. We do not tolerate this risk in Royalla

Submission No. SE-94999721, Royalla

machinery operating in the quarry will be very invasive and disturbing.

Submission No. SE-94957460, Googong

Response

Operational noise levels are predicted to comply with the relevant assessment criteria at all private residences (within NSW and the ACT). Noise impacts from construction activities have the potential to exceed noise affected levels at some locations and would be managed by employing appropriate construction noise management practises. Project noise is not predicted to cause hearing related conditions to the public.

Maintenance of machinery is included in construction noise and operational noise management measures to limit the risk of unexpected noise, specifically:

- Ensure that equipment selected for use in the Project would not exceed the nominated sound power levels presented in Appendix B of the NVIA (operational management measure).
- All equipment on site is maintained to adhere to existing noise standards and ensure that noise generated by equipment is not exacerbated (operational management measure).
- Regularly inspect and maintain equipment to ensure it is in good working order (construction management measure).
- Consider quieter construction equipment and methods where the works have the potential to exceed the “noise affected” level (construction management level).

4.2.16 Project Need

4.2.16.1 Other Proximal Quarries

Representative Comment(s)

We already have 2 quarries in close proximity to our homes, and 1 a bit further removed between Nimmitabel and Cooma. I question the need for this quarry. These quarries are not operating at full capacity, so there is no excess demand and there is capability to achieve further economies of scale.

Submission No. SE-93370709, Royalla

Need? Monaro Rock has not proved there is a need for an additional quarry. The Monaro Rock EIS asserts that the existing quarries in the greater ACT area can only meet supply for 13 years yet it later states that the “quantity of reserve rock held by operating quarries are not published and generally treated as confidential”. Without independently verified evidence that the quarry is required, within a specific timeline, for a need in NSW, it should not be considered.

Submission No. SE-93436712, Royalla

We know the other quarries in the region are producing well under their limits, and this is driven by a lack of demand not a lack of supply.

Submission No. SE-95116959, Royalla

Response

An *Assessment of Economic Need* was conducted by Ecoroc Consulting Engineers Pty Ltd (hereafter referred to as Ecoroc, 2025 and provided as Appendix A of the EIS). The assessment was an independent assessment of the supply and demand balance for hard rock resource material in the region. Findings from the report are summarised in Section 2.2 of the EIS. Ecoroc (2025) acknowledge in Section 7.3 that actual reserves and annual output from hard rock quarries vary over time and are not published by quarries unless required by legislation. Updates of hard rock

reserve inventories are considered by most industry players to be commercially sensitive and are therefore rarely made public. This does not mean that effective assessments of a Quarry's economic need cannot be made. Section 2.4.3 of Ecoroc (2025) describes how the hard rock reserves and resources data was collected, stating that historical EIS data from the quarries was gathered and adjusted to account for depletions since the estimates were made. Further sensitivity analyses were also applied in Section 8.5 of Ecoroc (2025)).

A demand and supply balance was produced, considering estimates of demand per capita for various construction materials compared to ACT and Queanbeyan-Palerang LGA construction statistics, and output from the four surrounding hard rock quarries that currently operate and service the region (Cooma Road Quarry, Mugga Quarry, Hall Quarry and Williamsdale Quarry). Demand forecasts were generated for three scenarios, and the findings are:

- Scenario 1: Existing reserves and capacity (no new approvals)
Finding: Cumulative shortfall of approximately 41Mt by 2050.
- Scenario 2: Scenario 1 plus Monaro Rock Quarry
Finding: Cumulative shortfall of approximately 23Mt by 2050.
- Scenario 3: Scenario 2 plus an extension of Williamsdale Quarry
Finding: Cumulative shortfall of approximately 6Mt by 2050.

Ecoroc (2025) concludes that population growth would continue to drive ongoing demand for construction materials and that any shortfall (which was expected from 2030) would need to be made up by importing aggregates from further afield (at a transport cost), adding to the total costs of housing, roads and other community buildings and infrastructure in the Canberra and Queanbeyan regions. Even when sensitivities are applied (e.g. a 10% reduction in demand and an increase in existing reserves at the four quarries), there remains a need for the Project.

The supply shortfall is expected from 2030, which may be the reason this is not noticeable to the community right now. The analysis presented in EcoRoc, (2025) supports the anecdotal evidence that the Applicant is receiving from within the construction materials industry that supply sources are being tightly managed and that price drivers support the inclusion of an additional source to encourage competition. This feedback is also evident in some supporting comments for the Project life this comment in Submission No. SE-95024707 from Jerrabomberra.

Breaking up the dominance of national corporations will lead to fairer pricing for contractors, developers, and end customers. This will help keep construction costs more manageable for local projects.

Unlike national companies that extract profits and send them elsewhere, locally owned operations reinvest earnings back into the community, supporting other small businesses and services.

A further comment from Submissions No. SE-94869710 also supports reducing reliance on materials transported from outside the region.

reduces dependency on a diminishing resource and avoids the need to transport by-products from outside the region. The result is both a lower carbon footprint and a more reliable, sustainable supply chain for concrete production.

4.2.16.2 Location

Representative Comment(s)

Our understanding is that quarries of this scale are, and should be, located much further away from existing residential properties and houses and sensitive areas.

Submission No. SE-92375707, Googong

The quarry will mainly service Canberra demand, and I suggest the quarry be located in the ACT not NSW.

Submission No. SE-93124236, Royalla

There are far greater areas of suitability for quarrying than the land proposed. The blue metal proposed to be quarried is available across a significant area to the South of the quarry.

Submission No. SE-94701720, Royalla

The Council is aware of the need for rock to support the sensible development of our region; however, in this case, the proponent is clear, rock is available elsewhere. The EIS states the site is geologically “well-suited”.³ Nowhere however does the EIS state that this site is the only place where suitable rock can be sourced.

Conservation Council Act Region

Submission No. SE-95026219, Canberra City

The rhyodacite rock sought by the quarry is readily available between the ACT and Cooma, with plentiful locations where few people live close. While this would increase transport costs, it would impact residents and commuters much less. We believe the primary reason for the quarry's location is to reduce costs and increase profits for Monaro Rock or any future operator. This should not be allowed to happen when the risks and impacts are so high from being close to a large population.

Royalla Community Association

Submission No. SE-95108463, Royalla

Response

The Assessment of Economic Need (EcoRoc, 2025, recognises that while suitable rock occurs elsewhere, its viability as an alternative depends on a number of factors including the following.

- Resource quality and suitability for intended use.
- Connection to regional infrastructure such as roads but also water and power.
- Transport distance from the source to the intended use.
- Geology and physical features of the site including drainage and topography.
- Strategic planning provisions.
- Existing land use and risks of conflict.

- Environmental capacity of the setting and how the design can accommodate existing constraints.
- Available alternatives considering land availability and ownership, access and for any alternative, each of the above matters

The Project would benefit communities in both the Queanbeyan-Palerang (NSW) and ACT regions, producing high-quality aggregates and road construction materials to meet the increasing demand in these areas. A large range of factors must be considered when determining the boundaries of a Quarry site. The following comment from Ecoroc (2025) in Section 5.2 also highlights these considerations.

‘geological drilling, sampling and testing has confirmed a high quality, hard rock resource able to be economically extracted from an area which is sufficiently isolated and contained within the Project Site, with suitable topographic shielding and buffer lands available to protect the amenity of the nearest residents and other sensitive receptors’.

Ecoroc (2025) identify that the Project Site may host the last available hard rock resource in the region, known to be suitable as a source of high-quality aggregates for concrete and other building and construction uses, and which has not been sterilised because of incompatible land uses.

If the Project does not proceed, the community would likely see an impact to the cost of housing, roads and public and commercial buildings. This is because cumulative shortfalls in hard rock would lead to importation of material from outside the region, increasing the cost of aggregates to customers and consumers.

The closest residential property is approximately 1.5km from the Project Site. The proximity of residential properties and sensitive areas to the Project Site has been thoroughly assessed and considered throughout the EIS and the Project design. Appropriate mitigation measures have been developed to reduce the impact the Project would have on surrounding areas. **Appendix 8** identifies the full range of measures the Project would adopt if approved.

4.2.16.3 Economic Need

2.4 Competition - Notwithstanding the above, increased competition among suppliers increases consumer choice, drives down prices, improves quality, and drives efficiency and innovation in production.

The above statement is not supported by any independent advice from industry experts or factual information that proves new competition in this field lowers prices. My husband has worked in the construction industry and believes this not be true and no benefit will flow through to consumers. Surely this economic report should provide further information to support this claim rather than a two-line sweeping statement.

Submission No. SE-94106732, Royalla

Response

The above submission is commenting on Section 2.4 of the Economic Impact Assessment prepared by Gillespie Economics (2025) and provided as Appendix M of the EIS. Gillespie (2025) lists the significance of the targeted resource, which includes competition, along with

resource quantity and quality, and demand and supply. Competition is a well-known determinant in contributing to construction material costs. Ecoroc (2025) confirm that competition helps to deliver economic and community benefits and highlights the impacts of diminished competition

'If approved the Monaro Rock Quarry will deliver the following economic and community benefits...supply external customers in the open market with a convenient, cost-effective local supply and range of high-quality coarse concrete aggregates, roadbases and other sized rock products such as gabion and revetment rock thereby maintaining competition, choice, and convenience for residents for construction materials in the demand catchment... The economic and community impacts of not replacing local hard rock quarries in regions of ongoing population growth and commensurate demand results in diminished local competition, choice and convenience for purchasers of aggregates, resulting in imports by road and consequent substantially higher construction material costs, making local housing, roads and other buildings and infrastructure more expensive than would otherwise be the case.'

Representative Comment(s)

The project's economic justification hinges on a forecast resource shortfall that the community believes is overstated. Even if a shortfall exists, the costs to our community's health, well-being, and lifestyle are not justifiable. We believe the local social and environmental costs far outweigh the regional economic benefits, which primarily serve large-scale infrastructure projects.

Submission No. SE-92388964, Royalla

The quarry is expected to create only 30 jobs, a negligible number compared to the tens of thousands of residents in the impact zone. The economic benefit is concentrated in the hands of two families – the owners of Monaro Mix and Pacific Formwork – while the negative impacts will be felt by thousands across Royalla, Enchanted Hill, Tuggeranong, and beyond.

Submission No. SE-94968725, Royalla

Response

Section 4.2.16.1 addresses concerns regarding resource shortfall, confirming accurate calculations have predicted cumulative shortfall by 2050 in three different scenarios. Concerns surrounding economic benefits to the community have been addressed above in Section 5.2.9. Gillespie (2025) concludes that the Project would deliver a net economic benefit of \$41 million to NSW. The main local environmental impacts are internalised into the production costs via mitigation, offset and compensation costs. Residual local environmental impacts after mitigation, offset and compensation are likely to be immaterial.

The main human health concerns from submissions were the impact of silica dust, water contamination from dust and runoff and impacts to mental health. The Human Health Risk Assessment (EnRiskS, 2025) concluded that human health risks from dust generated by the Project would be low and acceptable, in line with guidance from national health authorities. Water would be managed in a manner that minimises the possibility of uncontrolled discharge.

The Applicant recognises the concerns surrounding the Projects impact to well-being and lifestyle and, to relieve some of these concerns, the Project would develop and implement a Stakeholder and Community Engagement Strategy and Plan to promote openness, dialogue, reliable monitoring, and regular reporting (See Section 6.16.8 of the EIS). Mental health concerns are addressed in more detail in section 5.2.13 of this report.

4.2.17 Proximity to Residences

Representative Comment(s)

The site is less than 6km from Conder, Banks, and Gordon, and under 3km from Theodore. This project directly threatens families, schools, and aged care facilities in the region.

Submission No. SE-93182958, Gordon

Quarry is extremely close to residential homes, including my property, exposing residents to dust, noise, vibration, and safety risks.

Submission No. SE-93255961, Royalla

I don't want to leave Royalla - I have built a life and family here. This is the house I was planning on living in for decades. The danger to my families health may very well force us to leave. There are areas in NSW that aren't as populated residentially. Why plonk it in the middle of our town endanger lives?

Submission No. SE-93269462, Royalla

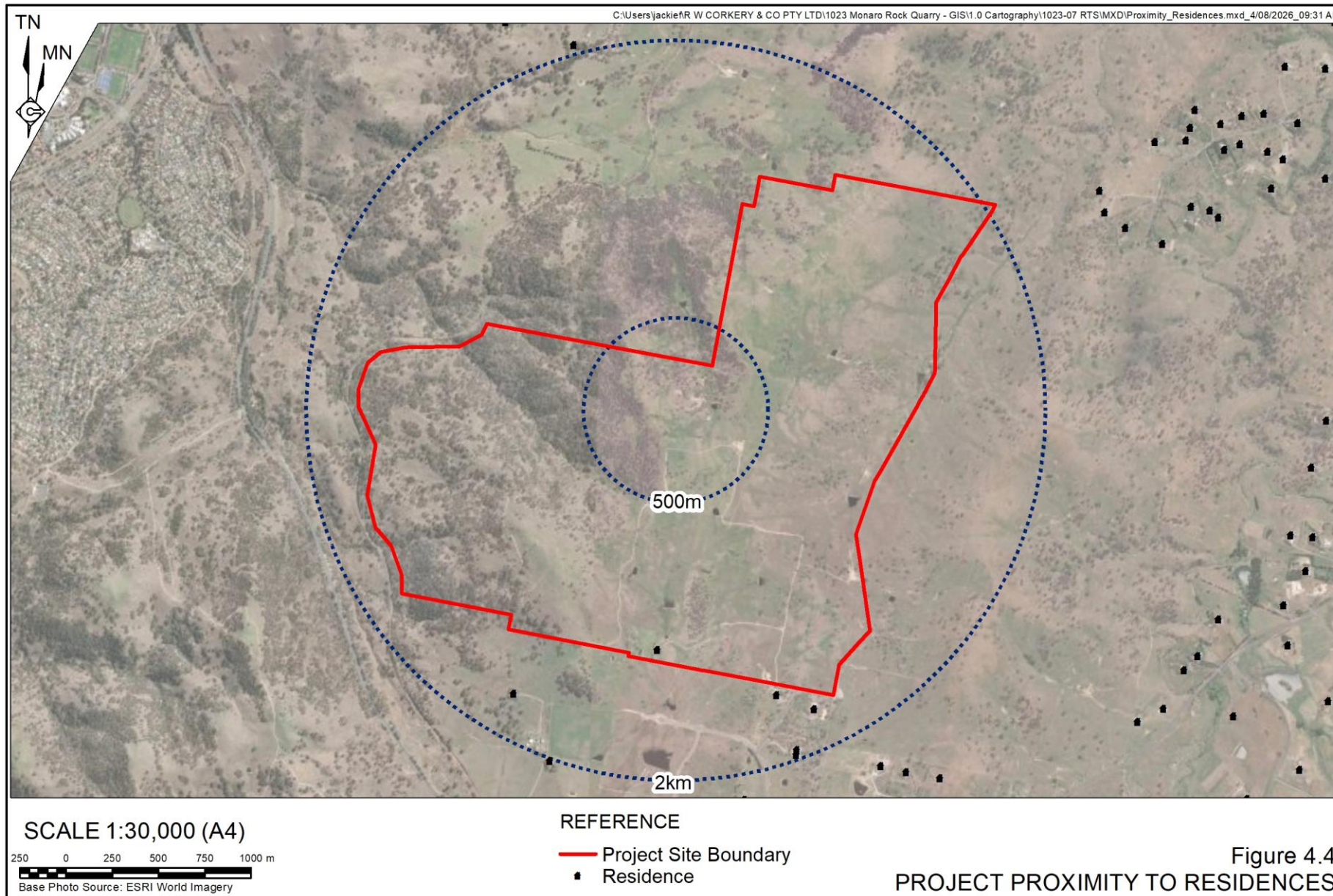
31,000 ACT and NSW residents live within five kilometres of the site. 92,000 residents live within ten kilometres. I am one of these residents, who is also a parent of a young family.

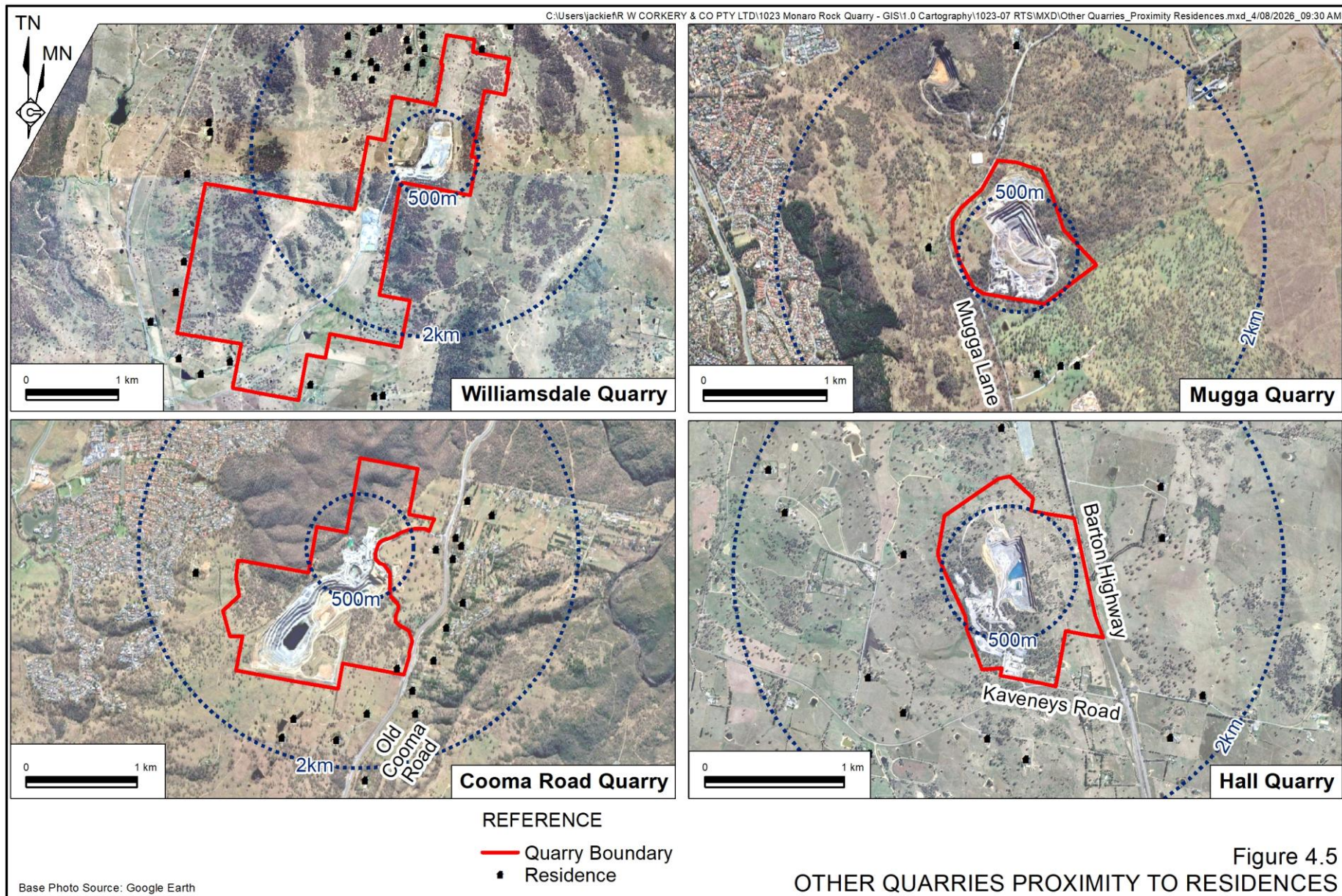
Submission No. SE-94343460, Conder

Response

The location of the Project and proximity to residences has been raised in consultation with the community from early in planning. The Project planning and decision-making has been informed by this feedback.

It is appreciated that Royalla is considered a rural residential area and historic grazing land. However, the Project location has deliberately been selected as the closest private residence is 1.5km away and so that existing topography would shield all but the most distant of views. **Figure 4.4** presents the Project Site and residences within 2km of the operating areas. For comparison, the same image and distance has been considered for the approved operations at the Williamsdale Quarry, Mugga Quarry, Cooma Road Quarry and Hall Quarry in **Figure 4.5**. It is clear from these figures that the approved and operating quarries are all operating in closer proximity to private residences. Although these submissions express concern and the proximity of the Project, the outcomes of technical assessment support the conclusion that environmental outcomes expected in the community would not occur.





It is important to recognise that the owners and management of Monaro Rock reside in the region and have a genuine long-term interest in ensuring it operates responsibly. The Company's families and employees live in the area, and the expected customers would be local. All concerns raised by the community will be addressed by people who are directly accountable and invested in maintaining positive long-term relationships with their neighbours. This is also evident in comments from supporting submissions such as this statement from Submission No. SE-95024707 from Jerrabomberra.

Local owners, who live within the community, are more likely to respond quickly and responsibly to environmental issues raised by neighbours and regulators, ensuring high levels of accountability.

The families live in area where the quarry is being proposed, so any negative effect also affects them.

4.2.18 Social Impacts

4.2.18.1 Lifestyle and Character

Representative Comment(s)

The SIA acknowledges that the project may compound existing stress from events like bushfires and the COVID-19 pandemic. The community's opposition is rooted in a deep-seated fear that the project represents an unacceptable cumulative impact on our quality of life. The perceived lack of control over local change and a distrust of regulatory processes – which the SIA also identifies – has already caused significant anxiety. The constant presence of heavy vehicles on the Monaro Highway, even with a dedicated access road, raises genuine fears for road safety and our families' well-being.

The community's experience with existing quarries in the region has left residents with a sense of "fatigue" and a heightened sensitivity to this new proposal. We are concerned that the cumulative effect of an additional quarry, with its associated traffic, noise, and environmental pressures, will push the social and environmental fabric of our community beyond a breaking point. The EIS does not adequately address how the social and emotional burden of this cumulative impact will be managed.

Submission No. SE-92388964, Royalla

We chose to live here for a specific way of life, and this project threatens to destroy it.

Submission No. SE-92388964, Royalla

I moved to Royalla for the lifestyle, to live in a quiet and peaceful area surrounded by wildlife and natural landscape.

Submission No. SE-93232707, Royalla

We chose to live in this rural area to enjoy the tranquillity and serenity that comes with living away from industrial and high-density urban areas. The introduction of constant quarrying activities will drastically and permanently alter our way of life.

Submission No. SE-93569210, Royalla

The Monaro is not just a landscape – it is a way of life. It is a place where silence still has value, where native grasslands stretch across rolling hills, and where communities are built on trust, connection, and respect for the land.

Submission No. SE-94049989, Royalla

Response

The Social Impact Assessment (SIA), prepared by Landscape Research (2025) and peer-reviewed by The Social Aspect (Appendix A to the SIA), recognises that Royalla's rural lifestyle is central to residents' identity, and sense of place. Section 6.16 of the EIS reinforces this, noting that the Project represents a significant land use transition in a locality defined by low-density living, environmental values, and a strong sense of place.

The principal mitigation for risks associated with perceived land use conflict is the 1.5km separation distance between the Project Site and the closest residences. The location for the Project Site operating areas requires the construction of a 4k private road to connect the Project Site with the public road network. The Quarry Access Road has also been deliberately located to move transport-related activities away from residences and to avoid as much as possible the use of local roads. Vehicles would enter the Monaro Highway, a National Highway and important freight route, with total traffic generated by the Quarry likely to be a small proportion of the vehicles (including heavy vehicles) that travel on the highway each day.

The SIA and EIS both acknowledge that amenity-related impacts—such as noise, dust, traffic, and visual change—may alter the lived experience of the area, even if technically mitigated. These impacts were assessed as moderate but manageable with appropriate controls (SIA Section 6.4.6; EIS Section 6.16.3). In response, the Applicant has committed to:

- a dedicated haul road that avoids local residential streets;
- acoustic and visibility barriers to reduce noise and visual impacts;
- dust suppression and progressive rehabilitation to preserve landscape character; and
- transparent monitoring and reporting of amenity impacts.

While technical assessments indicate that residual impacts are within acceptable thresholds, the SIA does not dismiss the possible emotional and experiential significance of a change that the community does not feel they have control over. It concludes that maintaining community trust would require not just compliance, but responsiveness, transparency, and ongoing engagement over the life of the Project.

4.2.18.2 Community Identity

Representative Comment(s)

- The community of Royalla is defined by its rural, peaceful, and family-oriented character. As detailed in the SIA, residents deliberately chose to move here to escape the noise, pollution, and chaos of city living. They have a strong connection to the rural landscape and a deep sense of self-sufficiency and neighbourly trust. The introduction of an industrial quarry in a greenfield location, just 1.5km from the nearest residence, fundamentally changes this identity.

Submission No. SE-92388964, Royalla

Royalla has a strong community spirit based on our quiet, rural, environmentally friendly existence

Submission No. SE-93436712, Royalla

Response

The SIA (Section 5.5) and EIS (Section 6.16.2) both identify Royalla's community identity as deeply tied to its rural setting, environmental values, and neighbourly trust. The introduction of the Project in a greenfield location, even 1.5 km from the nearest residence, represents a significant shift in land use and social meaning. This change risks fragmenting the shared sense of place and cohesion that defines Royalla.

To address this, the Applicant has committed to:

- establishing a Community Consultative Committee to ensure ongoing dialogue;
- implementing a formal complaints protocol with transparent resolution pathways;
- delivering public benefits through a Planning Agreement with Council; and
- publishing annual reports on community engagement and social indicators (SIA Section 7.2; EIS Section 6.16.4)

These measures are designed not only to mitigate impacts but to preserve the integrity of Royalla's community identity through inclusive engagement and clear accountability.

4.2.18.3 Property Value

Representative Comment(s)

The quarry is also going to decrease the property value of our entire community

Submission No. SE-93142978, Royalla

The cumulative impact of my property being sandwiched between two quarries at the North and South flank will be evident and worsened if the quarry was approved. Royalla would suffer reputational damage as a rural residential location and would suffer property value impacts. The sheer scale of the proposal is unfathomable.

Submission No. SE-95114708, Royalla

The value of the property I have worked hard to purchase and maintain as a single parent will be lost, This was to be a legacy for my children

Submission No. SE-93290234, Googong

During our Sale period...every group who visited mentioned the proposed mine and their concerns with silica dust contamination and traffic congestion issues should they move here.

Submission No. SE-93391709, Royalla

The option to sell our land and move to another location where we would be able to live our desired lifestyle of peace, quiet, fresh air and clean water is not available to us.

Submission No. SE-94978721, Royalla

Response

Section 6.4.7 of the SIA (Landscape Research, 2025) acknowledges that perceived impacts, particularly those related to amenity, health, and landscape character, can influence buyer sentiment and market behaviour, even in the absence of measurable changes in valuation. Section 6.16.3 of the EIS similarly notes that while property values are influenced by multiple factors, community perceptions are valid and must be addressed.

While empirical evidence from similar projects shows mixed outcomes, the SIA does not dismiss community concerns. Instead, it recommends a proactive approach to managing amenity impacts and maintaining transparency. The Applicant has committed to:

- minimising visual and acoustic intrusion through design controls
- avoiding residential roads for heavy vehicle movements; and
- publishing monitoring data on dust, noise, and traffic.

The SIA concludes that while no irreversible impacts to property value are predicted, the Project should aim to operate without intruding on the community to the greatest extent possible.

4.2.18.4 Community Consultation

Representative Comment(s)

Consultation regarding the proposed development has been infrequent and inadequate with all stakeholders and owners. There is a perception that it has been perfunctory and represents the bare minimum.

Submission No. SE-92375707, Googong

The ACT borders the quarry, but as it is in NSW, there has been NO community contact with the ACT people.

Submission No. SE-93573209, Royalla

The report lists potential positive social impacts such as employment, financial contributions to community projects, and site rehabilitation. However...no commitments to community projects have been made by Monaro Rock. If genuine, such offers would have already been extended to the Royalla Common, which has a master plan with several incomplete initiatives (e.g., horse arena, playground, bike track). The absence of outreach suggests these contributions are unlikely to materialise post-approval.

Submission No. SE-95087457, Royalla

A significant number of the residents in the communities of Royalla, Little Burra, Googong, Jerrabomberra NSW and Tuggeranong ACT had little to no consultation regarding the quarry proposal and the impact it will have on their health, daily driving, recreation and quality of life.

Submission No. SE-95102987, Royalla

Response

Project-related engagement and engagement for the SIA (Landscape Research, 2025) included multi-phase engagement with all stakeholders and residents within the defined Local Study Area. The Applicant acknowledges that the Project's proximity to the ACT border raises legitimate concerns for ACT-based communities and confirms that formal consultation with ACT stakeholders will occur during the ACT application process, which is a separate statutory pathway.

In response, the Applicant has committed to:

- Establishing a Community Consultative Committee in line with Departmental guidelines, with representation from both NSW and ACT communities.
- Publishing annual reports on community engagement, complaints received, and how feedback has informed Project decisions
- Delivering public benefits through a Planning Agreement with Council, shaped by community input.

4.2.18.5 Tourism

Representative Comment(s)

UMLC are also opposed to the project because of the potential impact on the Rail Trail that runs from Queanbeyan through to Cooma and Bombala. UMLC local Landcare groups work in conjunction with Queanbeyan-Palerang Regional Council to manage sections of the rail trail to assist in the development of the trail for tourism use. The increase in heavy vehicles, noise and dust pollution threaten the quality and safety of this tourism feature and risks the value of the current investment in the Rail Trail Project.

Upper Murrumbidgee Landcare Committee, Submission No. SE-95088707, Conder

In addition, the tourism and local services industries, which also contribute to the region's economy, would be adversely impacted. The proposed quarry would make the area less attractive to tourists and potential new residents, particularly those who are drawn to the quiet rural lifestyle.

Submission No. SE- 94455458, Banks

This type of social impact cannot be underestimated and will have a sustained negative effect on the region and the tourism sector.

Submission No. SE-95102457, Googong

Response

The SIA (Section 6.4.6) and EIS (Section 6.16.3) considered potential impacts to tourism and regional attractiveness, particularly in relation to amenity, landscape character, and recreational assets such as the Queanbeyan–Cooma Rail Trail. While the Project is not located directly adjacent to major tourism nodes, the cumulative effect of dust, noise, and traffic may influence visitor experience and the perceived appeal of the region.

To mitigate these risks, the Applicant has committed to the following measures.

- Constructing acoustic and visibility barriers to reduce noise and visual intrusion
- Implementing dust suppression measures and progressive rehabilitation to maintain landscape quality
- Using a dedicated haul road to reduce traffic on shared routes and avoid conflict with recreational users
- Engaging with local groups, including Landcare and tourism stakeholders, to monitor and manage emerging impacts.

The SIA concludes that while tourism impacts are not expected to be severe, they must be monitored and managed proactively to protect the region's amenity and reputation. The SIA considered potential impacts to tourism and regional attractiveness, particularly in relation to amenity, landscape character, and recreational assets such as the Rail Trail (see Section 6.4.6 of the SIA). While the Project is not located directly adjacent to major tourism nodes, the cumulative effect of dust, noise, and traffic may influence visitor experience.

4.2.19 Soil and Land Capability

Representative Comment(s)

I do not support the project due to the following reasons...

- *Degradation of the soil in the vicinity of the quarry*
- *Deterioration of the stability of the ground in the vicinity of the quarry, possibility of sink holes forming*

Submission No. 94341970, Gordon

A quarry could undermine the agricultural potential of the area, through soil degradation and water contamination, which may have long-term negative effects on local farming operations.

Submission No. 94455458, Banks

Extraction may lower the water table, affecting:...

- *Soil moisture and vegetation health.*

Submission No. 94631208, Royalla

Response

The Soil and Land Capability Assessment prepared by SEEC (2025) (EIS Appendix J) included detailed field investigations, laboratory testing, and erosion hazard modelling across the Project Site. The assessment confirmed that the soils within the limit of disturbance are generally shallow, low in fertility, and of limited agricultural value (see SEEC (2025) Section 3.4 and Table 4). Productive soils located in broad drainage depressions were excluded from the Project footprint to avoid impact to higher capability land (see SEEC (2025) Section 2.1).

No evidence of subsurface instability or sinkhole risk was identified during investigations. The geology underlying the Project Site consists of Silurian volcanics and sedimentary formations, which are not typically associated with karst or sinkhole-prone conditions (see SEEC (2025) Section 2.3). Groundwater impacts were assessed by Hydrogeologist (2025) and are summarised in the EIS (Section 6.13), and the Project's water management system is designed to avoid interference with natural groundwater flows.

Representative Comment(s)

silica dust can contaminate soil

Submission No. SE-94526759, Banks

The risk of water and soil contamination due to quarrying activities is a serious concern.

Submission No. SE- 94663008, Royalla

There is potential for water and soil contamination from washing equipment, concrete recycling, and runoff from the site.

Submission No. SE- 94869708, Vincentia

Response

Potential dust and runoff impact to soil and water quality were assessed in both the EIS (Sections 6.2, 6.12, 6.13) and the Soil and Land Capability Assessment (SEEC, 2025). The Project would implement dust suppression measures, vegetated buffers, and progressive rehabilitation to minimise airborne particulates, including silica dust. Sediment basins and clean water diversion drains would be installed to manage runoff.

Concrete recycling and equipment washing would occur within designated containment areas, with appropriate drainage and sediment controls to prevent contamination. SEEC (2025) confirmed that the site's erosion risk is manageable with standard controls, and wind erodibility ratings were used to inform the design of mitigation measures (SEEC, 2025 Section 3.6.2 and Table 7). These safeguards ensure that soil and water resources are protected from contamination throughout the life of the Project.

4.2.20 Surface Water

4.2.20.1 Stormwater Runoff

Representative Comment(s)

Further, while airborne dust particles will be a major factor, there will be further issue with particles that rest on site. Presumably these will be washed away, either manually onsite and/or washed away via rainfall compromising our waterways further. This should not be allowed.

Submission No. SE-94297207, Conder

They have indicated that they will wash their trucks and equipment onsite and this will cause a pollution risk.

Submission No. SE-95100959, Royalla

The site is elevated from the surrounding residential areas, therefore all pollutants will flow downhill to residential areas (this includes noise, dust and odours).

Submission No. SE-95115232, Googong

Response

SEEC (2026) prepared a detailed Surface Water Management Report that presents how runoff from the Project site has been considered and a water management strategy has been developed. One of the objectives of the water management system is the separation of clean water from externally draining catchments and dirty water from internally draining catchments; essentially ensuring that polluted, untreated water does not exit the project site. Clean water drains would be located upstream of the Quarry to direct upstream clean water around the Project Site. Dirty water would be diverted and captured into a series of progressively constructed sediment basins on site. These basins would store the runoff for a sufficient period to allow the sediment to settle out of suspension prior for reuse or if capacity of the dams is exceeded, it would be discharged to the local setting once it is confirmed that water is of suitable quality for receiving environments (see Section 5.2 of the SEEC, 2026). Supplementary erosion and sediment controls would be installed as required to reduce the velocity of flows and capture sediments.

Representative Comment(s)

The EIS summary p 37 states that Mitigation measures for surface water resources include the following.

- Construction of clean and dirty water dams, diversion drains, and sediment basins.*
- Use of flocculants and water quality testing prior to discharge.*
- Implementation of a Water Management Plan and monitoring of water quality and infrastructure.*

It is MCG's experience that standard mitigation measures such as those listed above are insufficient to handle the extreme weather events in the local region that have been impacting large scale developments during their construction stages and even after completion of the

project in the recent decade. Googong Township is a prime example. Lessons must be learned from the experiences of Googong Township and improved mitigation to handle extreme conditions must be put in place to protect the headwaters of the Jerrabomberra Creek to avoid adversely impacting immediate landscapes and those further downstream.

Molonglo Conservation Group
Submission No. SE-94349957, Oaks Estate

Surface water assessments are based on 'average' conditions, ignoring flood variability.

Submission No. SE-95057717, Royalla

The polluted water being discharged into holding dams. What happens when we have a rain event which we are forecast to have even more extreme events in years to come? The overspill will go into the surrounding waterways & eventually into the Murrumbidgee part of the Murray Darling system.

Submission No. SE-95055207, Royalla

Response

Flood management has not been incorporated into the Projects' water management system because the Project Site is not situated within a flood planning area or a zone where inundation from floodwater could be expected to occur. Subsequently, neither the development itself nor neighbouring properties would be adversely impacted by the Project from floodwater (see Section 6.12.6.4 of the EIS). The surface water management strategy has been refined following consultation with the NSW EPA and with dam capacity increased to provide storm storage for the 1 in 10 year average exceedance probability event. This enables a greater level of stormwater storage capacity and would account for infrequent high rainfall events, while enabling water management with the Project Site. The Project has been designed to avoid direct disturbance to downstream watercourses, including Jerrabomberra Creek.

Section 5.2 of SEEC, (2026) outlines the management of sediment basins. The sediment basins require available storage capacity for rainfall events, to avoid uncontrolled discharge of sediment laden water to the environment. The Project would utilise surface water from the sediment basins through beneficial reuse of detained surface water and land application of detained surface water onto vegetated or rehabilitated areas, keeping the basins at the required storage capacity. If the water could not be utilised, it would be treated and tested prior to controlled discharge. Any discharge from sediment basins will be required to meet the conditions of the EPL, ensuring water quality remains within acceptable limits. These include but would not be limited to the following.

- pH: 6.5–8.5
- Electrical conductivity: 30–350µS/cm
- Total Suspended Solids: ≤ 50mg/L
- Turbidity: 2–25 NTU (for aquatic systems)
- Dissolved oxygen: (% saturation)
- Visual clarity, colour, and absence of oil and grease

4.2.20.2 Creeks and Watercourses

The Tuggeranong Creek, which runs through Calwell, has recently undergone significant rehabilitation efforts. The potential for runoff and sedimentation from the quarry to pollute this creek would undermine all the work that has been done and would have a devastating effect on the local ecosystem.

Submission No. SE-94249212, Theodore

Page 10 of the EIS ground water plan categorises the surrounding creeks as 'minor and ephemeral'. Guises Creek is neither of these. It commences just to the South of the project boundary. It is one of the water sources for our property and our neighbours. It is a permanent creek and provides beautiful swimming holes that family and friends have enjoyed for many years. A project of this size placed at the headwaters of this creek can only disrupt and pollute it.

Submission No. SE-94630464, Royalla

The project is located at the headwaters of Monks Creek and Dunns Creek, both of which ultimately flow to the Murrumbidgee River. There has been significant public and private investment in improving water quality in the immediate area of Monks and Dunns creeks, for the benefit of the entire catchment. While there will likely be sediment traps on the site, the terrain and proximity of the extraction site to its property boundary means that sediment runoff will be inevitable, and this will compromise water quality in the catchment. This issue has not been adequately addressed in the EIS.

Submission No. SE-94849957, Tuggeranong

Response

Concerns surrounding runoff and sedimentation leaving the Project Site are addressed in Section 4.2.20.1, while concerns around aquatic ecosystems are addressed in Section 4.2.5.2. Section 6.1.2 of the EIS acknowledges that drainage from the Project site generally flows east into Jerrabomberra Creek and north into Monks Gully, draining to Dunns Creek and continuing to Tuggeranong Creek. Some drainage lines also direct water south towards Guises Creek (Section 6.12.2 of the EIS). A Water Management Strategy has been designed to ensure that that water is managed in a manner that maximises opportunities for reuse and recycling and minimises the possibility of uncontrolled discharge (see Section 6.12.4.1 of the EIS). An Erosion and Sediment Control Plan has also been prepared, supporting the management of clean and dirty water (Section 6.12.4.2 of the EIS). It is not anticipated that the presence of the Project, would impact the water quality in Guises Creek, Monks Creek or Dunns Creek.

Submission No. SE-95102457, Googong

I am a young farmer (32) trying to make my way in the agriculture industry that is becoming increasingly challenging to make a living. With residential development impacting water run-off and an increase in consumption coupled with periodic climate fluctuations impacting the volume of ground water available there is a real risk that even if the quarry don't use the ground water for dust control and excavation the water quality could be effect with their practices. The Googong Dam is a water supply that is already impacted by the other quarries in the area, another quarry without an economic need is senseless.

Submission No. SE-93320957, Royalla

Response

Community feedback in initial consultation stressed the importance of water supply and water quality to local properties. The Project has been planned to rely on a sustainable groundwater source that would top up water captured in operating areas that would be used preferentially for dust suppression. Water may also be sourced under the maximum harvestable rights of the property, which permit the construction of farm dams in certain locations. The Project would not be likely to have a measurable impact of water supply to private properties and would not influence water supply to Googong Dam. Water quality risks would be managed in accordance with a Water Management Plan and the water management strategy developed by SEEC (2026).

4.2.21 Traffic and Transport

4.2.21.1 Old Cooma Road and Other Local Roads

Representative Comment(s)

It would be better if the trucks exclusively transported quarry resources on the Monaro Highway and not on Old Cooma Road.

Submission No. SE-92339971, Googong

Quarry heavy vehicles exit directly onto Monaro Highway. Allowing the quarry traffic to exit directly onto the Monaro Highway will relieve pressure on Old Cooma Road. However, I foresee that the NSW Government will approve the quarry, but the ACT Government will not approve direct access to the Monaro Highway. Monaro Rock will then send 25 truck and trailers per day on Old Cooma Road at 100km/hr from 0600-1700 six days a week.

Submission No. SE-93436712, Royalla

The construction route via Mates Drive and Monaro Station Road is completely unsuitable being a low volume quiet residential street ending in a dead end. There is no through traffic on these streets and they have been built to that standard/specification. They are completely unsuitable for heavy vehicles of the numbers needed for quarry construction and even more unsuitable for extended use as a major quarry thoroughfare if Monaro Highway access is not provided.

Submission No. SE-95114708, Royalla

Response

The primary vehicle access to the Project Site is planned via a dedicated Quarry Access Road, which would intersect the Monaro Highway approximately 3.4km north of its intersection with Old Cooma Road. Any use of Old Cooma Road for product despatch would only occur if material is being delivered to customers in Royalla, Fernleigh Park or Googong. The majority (95%) of vehicles transporting quarry products would turn right at the intersection of the Quarry Access Road and the Monaro Highway. to the remaining 5% of vehicles are estimated to turn left at the intersection with the Monaro Highway and of these an even smaller proportion would enter Old Cooma Road.

The use of Old Cooma Road, Monaro Station Road and Mates Drive during site establishment and construction would be required until the Quarry Access Road is constructed. No product despatch would occur via the Secondary Access Road. The Applicant proposes to include a preliminary road condition assessment and follow up road dilapidation assessment of Mates Drive and Monaro Station Road following the completion of construction activities as a commitment in a Planning Agreement with Council (see Section 4.1.6). During operations the Secondary Access Road is intended for light vehicles only and proposed to extend from the Infrastructure Area to its intersection with Mates Drive. This indicates that Mates Drive would facilitate limited site access, specifically for staff, contractors, or other light vehicle users, but is not intended for heavy vehicles or product transport. This approach helps to minimise the impact on local traffic and infrastructure along Mates Drive.

A Road Transport Assessment (TTPP, 2026 and provided as **Appendix 6**) was undertaken to evaluate the Project's effects on the surrounding road network, including construction and operational phases. The assessment has been updated in consideration of the time elapsed since the surveys of background traffic conditions were conducted. This includes reporting of the results of additional traffic surveys conducted in November 2025, and review of background traffic growth on Monaro Highway. A description of the updated outcomes is provided in Section 3.3.5.

As noted in response to comments from the ACT Government presented in Section 4.1.8, the Applicant is consulting with the City and Environment Directorate, ACT Heritage and the Conservator of Flora and Fauna regarding the development application for the proposed short road and intersection with the Monaro Highway. The preliminary support provided for the configuration of the intersection and the outcomes of the Road Transport Assessment (TTPP, 2026) provides the Applicant with a measure of confidence that a development application for the short road and intersection would be supported.

4.2.21.2 Infrastructure Damage and Capability

Representative Comment(s)

This level of traffic... threatens the integrity of local infrastructure, leading to wear and degradation not budgeted for by local councils.

Submission No. SE-94184963, Royalla

as a rate payer in the Queanbeyan Palerang council area will I be required through rate increases to pay for the extra damage done to Old Cooma Road.

Submission No. SE-94687459, Royalla

The current infrastructure/roads are nor safe or suitable for consistent heavy vehicle machinery movements and it should not be the responsibility of government (tax payers) to upgrade these

Submission No. SE-94792710, Tralee

Response

Section 2.8 of the EIS describes the detailed consideration of alternatives that was undertaken in choosing the proposed Quarry Access Road route and intersection with the Monaro Highway. This infrastructure, including a rail overbridge would be constructed, owned and maintained by

the Applicant. The approach has been designed to avoid the need to use local roads like Old Cooma Road for all product despatch and would avoid degradation of this infrastructure (subject to management by Council). The Monaro Highway is a national highway and maintained by the Australian Government as a major freight route. It has been designed and constructed to accommodate traffic at much higher levels than that proposed for the Project.

4.2.21.3 Monaro Highway

Representative Comment(s)

What the study and its authors fail to appreciate is that for the people of southern Tuggeranong, the Monaro Highway IS a 'local road'. Our families utilise it to get to work, and school, and as an arterial link to the City and North Canberra.

Submission No. SE-95096045, Conder

The current proposal does not indicate how trucks will safely depart the quarry and turn right out of the quarry onto the Monaro Highway.

With 200 truck movements a day, over an 8 hour period that is 1 truck every 2.4 minutes. The entry and exit from the quarry, north onto the Monaro Highway must be seamless and safe to protect all other road users, and to eliminate the potential of any traffic diversions onto Old Cooma Road.

Submission No. SE-92425973, Jerrabomberra

In particular, I am alarmed by the increased traffic burden this will place on the Monaro Highway—a vital arterial route already under strain. During the winter ski season, congestion on this road intensifies dramatically, with thousands of vehicles heading to and from the Snowy Mountains. Introducing a high volume of quarry trucks into this mix poses a serious safety risk to all road users. The potential for accidents, delays, and road degradation is not just hypothetical—it's inevitable.

Submission No. SE-93099457, Royalla

The increasing number of heavily laden trucks trying to enter the Monaro Highway will pose a very high traffic accident risk.

What traffic management plans or upgrades to the Monaro Highway will be undertaken to reduce the risk?

Submission No. SE-94388207, Theodore

Response

The intersection of the Quarry Access Road and Monaro Highway has been designed with a configuration that is consistent with Austroads standards that are intended to ensure safe use of the road network for all vehicles. Vehicles exiting the Quarry to head north would perform a staged exit, first giving way to southbound traffic on the Monaro Highway, then accelerating and merging into the northbound lane when a safe gap appears. For vehicles turning right into the Quarry from the highway, a dedicated channelised right turn short lane would be provided, enabling them to decelerate and wait safely out of the main traffic flow before turning across the

southbound lanes. Additionally, vehicles making a left turn into the Quarry Access Road will have an auxiliary left turn lane, allowing deceleration away from the southbound traffic stream, further reducing the risk of collisions and improving overall intersection safety.

Support for this approach is evident in supporting submissions such as in this comment from Submission No. SE-94897457 from Kambah.

The dedicated private access road to the Monaro Highway addresses community concerns about noise, traffic, and disruption, demonstrating a thoughtful approach to minimising the project's impact on local residents

To accommodate increased winter ski traffic, several actions would be considered to ensure safe and efficient movement of both project-related vehicles and public traffic. During peak ski season, coordination with local authorities may be required to monitor and manage traffic flows on the Monaro Highway and surrounding access roads, particularly during early mornings and late afternoons when ski traffic is heaviest. Where feasible, scheduling of heavy vehicle despatch from the Project Site could be adjusted to avoid peak ski traffic periods, thereby reducing the risk of congestion and improving safety for all road users. Additional signage and temporary traffic management measures, such as reduced speed zones near the Quarry Access Road intersection, could be implemented to alert ski traffic and minimise delays. These proactive steps would help maintain smooth traffic flow and minimise disruption during the busy winter months. Any measures proposed for these events could only be implemented in consultation with the ACT authorities and would be considered on a case-by-case basis.

The main access to the site would be via the Quarry Access Road, which connects directly to Monaro Highway, minimising interaction with local roads and residential areas. This route is intended to accommodate heavy vehicles such as truck and dog trailer combinations, semitrailers, and rigid trucks, all of which will transport quarry products and imported materials. To further mitigate impacts on local traffic, a Secondary Access Road is provided for light vehicles, connecting the Infrastructure Area to Mates Drive. Mitigation for transport activities includes measures such as signage, speed controls, and designated turning lanes at intersections to enhance safety. Where possible, importation of VENM/ENM would use trucks returning from deliveries, reducing the number of empty vehicle trips and overall traffic volume. All vehicle movements would be monitored via the weighbridge to ensure compliance with approved transport limits and to provide accurate reporting. These strategies aim to minimise congestion, maintain road safety, and reduce the environmental footprint of transport activities associated with the Project. A Traffic Management Plan for the Project would be implemented to guide the safe and efficient movement of vehicles associated with quarry operations, material importation, and product despatch and would include the Drivers Code of Conduct that would provide specific instructions on the Applicant's expectations for driver behaviour including disciplinary procedures for failures to comply with the code.

The intersection of the Quarry Access Road with the Monaro Highway, located approximately 3.4km north of its intersection with Old Cooma Road, is a key point for vehicle entry and exit to the site. Visibility for traffic at this intersection was a crucial consideration during design to ensure safe movement of quarry vehicles and public road users. Adequate sight distances would be maintained in both directions along the Monaro Highway to allow drivers sufficient time to react to vehicles entering or exiting the Quarry Access Road. This typically involves maintaining clear lines of sight and minimising any visual obstructions such as vegetation, signage, or earthworks near the intersection. Additionally, appropriate signage and road markings would be installed to alert highway traffic to the presence of quarry vehicles, further enhancing safety for all road users.

4.2.21.4 Traffic Volume, Safety and Congestion

Representative Comment(s)

The proposed number of trucks travelling our roads is beyond reasonable. There are already so many trucks travelling along Old Cooma Road and the Monaro Highway.

Submission No. SE-94965535, Googong

The traffic surveys conducted for the EIS are also flawed by using data from a period in 2021 that the report already identified as statistically significant less traffic owing to travel restrictions through the COVID-19 pandemic.

Submission No. SE-94979458, Royalla

The proponent has indicated that up to 500 truck movements per day will turn onto the Monaro Highway. This volume of industrial traffic is completely inappropriate for a community where children, including my own, use Monaro Station Road daily to catch the school buses, ride their horses and enjoy going for daily walks.

Submission No. SE-94981964, Royalla

My second concern is the sheer volume of truck movements per day as the reports have stated that Monaro Rock intend to have 25 trucks per hour and a maximum of 200 trucks per day. Will this cap be monitored and if so who will be responsible and what consequence will be imposed if this cap is exceeded?

Submission No. SE-95098980, Royalla

Response

TTPP (2026) modelled the traffic volumes associated with the Project taking into account existing traffic levels and accounting for projected traffic growth over the life of the Project.

Estimated traffic levels are presented in Section 3.8 of the EIS and specifically in Table 3.5 which confirms that the maximum hourly traffic level would be limited to 25 loads and maximum daily product despatch would be limited to 200 loads of aggregate materials. An additional maximum of 50 concrete agitators per day may be despatched from the Project Site. To be clear, the maximum traffic levels presented for the Project are intended to allow the Project to meet peaks in demand, that may occur if there is a large project that requires high levels of materials. This might include work on the Canberra Airport for example. However, it is clearly stated in the Road Transport Assessment (TTPP, 2026) and the EIS that this would not occur every day.

Should the maximum concrete production and maximum aggregate despatch occur on the same day, this would equate to a maximum of 500 truck movements (accounting for the return movement as well as the despatch movement). This is highly unlikely to occur on the same day and maximum despatch would not occur every day. At a production limit of one million tonnes per annum and assuming a pay load of 35t and 305 operating days in a year (excluding Sundays and public holidays), the average rate of product despatch would be 3,230t per day or 94 loads despatched. If the Project were to operate at 200 loads per day, the production limit would be reached within 143 days and the operation would need to close for the rest of the year.

Concerns about the impact of truck volumes on local amenity and safety are valid, particularly for residents who share the corridor with school buses, equestrian users, and pedestrians. The Project has been designed to avoid the use of these local roads as much as possible with all heavy vehicles directed to a dedicated Quarry Access Road and intersection with the Monaro Highway. This design decision was made specifically to reduce exposure of local residential roads to quarry traffic.

Monitoring and compliance would be managed through a combination of regulatory oversight and operator commitments. The Applicant would monitor vehicle despatch at the weighbridge that would ensure that truck numbers remain within the approved limit and that haulage routes are strictly adhered to. Exceedances of approved limits would constitute a breach of consent and be subject to enforcement by DPHI. The Applicant would also implement a Driver Code of Conduct and induction program to reinforce compliance and safe behaviour.

In summary, while the Project would introduce additional truck movements, the number is limited, would be monitored and would be managed through enforceable conditions. The updated traffic surveys demonstrate that the approach to assessment was accurate and reasonable. The design of the haulage route ensures that local residential roads are protected from Project traffic.

Representative Comment(s)

I am already afraid of trucks on the Monaro highway there are already an excessive number of accidents on the turn offs.

Submission No. SE-93269462, Royalla

As a parent, I am deeply concerned for the safety of my children, who will soon begin learning to drive. Young, inexperienced drivers will face a far greater danger navigating around frequent, oversized vehicles. This poses an unacceptable risk to not only my family but also to other road users, including cyclists, pedestrians, and school buses.

Submission No. SE-93569210, Royalla

I have serious concerns regarding the safety of the proposed exit and entry point over the old train line. Its proximity to the existing merge and overtaking lanes creates a highly dangerous situation.

Submission No. SE-94338708, Royalla

Tipper and dogs have accounted for several fatal accidents on the Monaro highway in recent years. These are the same trucks that will be servicing the quarry, in an area of increased civilian traffic, at challenging intersections. How will the safety risk be managed?

Submission No. SE-94997726, Michelago

Response

Safety on the Monaro Highway is a central concern raised by the community and was a key focus of the Road Transport Assessment (TTPP, 2026) and EIS (Section 6.13.4). The Project has therefore been designed to avoid exacerbating existing risks by constructing a new, purpose-built intersection that meets Austroads design standards.

The proposed intersection would include dedicated acceleration and deceleration lanes, ensuring that quarry trucks can enter and exit the highway without impeding through-traffic. Sight distances have been assessed against Austroads guidelines, and the design ensures that vehicles on the highway will have adequate visibility of trucks entering or leaving the site. The location of the access point was carefully chosen to avoid conflict with existing overtaking lanes and to provide sufficient separation from other intersections.

The Applicant acknowledges concerns about vulnerable road users, including school children, learner drivers, cyclists, and equestrian users. To address these risks, the Project would implement a comprehensive driver management system, including mandatory inductions, fatigue management protocols, and a strict code of conduct.

Section 6.16.3 of the EIS concludes that with these mitigation measures in place, the Project can operate safely without materially increasing accident risk. Importantly, the safety measures are not limited to design features but extend to ongoing operational management and monitoring, ensuring that risks are actively managed throughout the life of the Project.

Representative Comment(s)

The Monaro Highway is already congested and hazardous.

Submission No. SE-94322761, Banks

The roads are already strained, particularly the Monaro Highway at the Calwell Roundabout with 'Snow Traffic' and it could not cope with the increased volume of trucks.

Submission No. SE-93320957, Royalla

Response

The Monaro Highway is a critical arterial route that already experiences congestion during the winter ski season when traffic volumes increase significantly. TTPP (2026) modelled the impact of quarry traffic on the highway and key intersections, including the approach to the Calwell Roundabout. The modelling found that the additional quarry traffic would represent a small proportion of overall highway volumes — typically less than 5% of daily flows — and that the incremental impact on congestion would be modest.

However, the Applicant acknowledges that congestion is already a lived reality for many road users, and that even small increases can feel significant in peak conditions. The Project therefore includes measures to minimise cumulative impacts, including the following.

- Measures to avoid convoying during truck despatch and concentrated flows during commuter peaks and ski season traffic.
- A dedicated access road and intersection to ensure Project traffic enters the highway directly, without adding pressure to local roads or intersections.
- Ongoing traffic monitoring to track actual volumes and adjust scheduling if required.

Section 6.16.3 of the EIS concludes that while congestion on the Monaro Highway is a broader regional issue, the incremental contribution of Project traffic is manageable with the proposed mitigation. The Applicant has also committed to working with TfNSW and ACT Government to ensure that the Project's traffic management aligns with broader highway upgrade programs.

In summary, while congestion is a legitimate concern, the modelling indicates that the Project's contribution would be relatively minor, and mitigation measures are in place to ensure that impacts are actively managed and monitored.

Representative Comment(s)

surveyed intersection results at Old Cooma Road were surveyed during a wave of the Delta strain and when working from home was an acceptable option for workers. Data from 2021 does not accurately reflect the current situation, the increased development at Googong and other subdivisions that have come online and utilise Old Cooma Road.

Submission No. SE-94972209, Gilmore

Response

A Road Transport Assessment (**Appendix 6**) was undertaken by TTPP (2026) to evaluate the Project's effects on the surrounding road network, including construction and operational phases. The assessment has been updated in consideration of the time elapsed since the surveys of background traffic conditions were conducted. This includes reporting of the results of additional traffic surveys conducted in November 2025, and review of background traffic growth on Monaro Highway.

The updated Assessment details the traffic surveys undertaken in November 2025 at key locations near the Project, including Monaro Highway, Old Cooma Road, and Monaro Station Road. The two week survey (excluding public holidays), used automatic tube counters to validate earlier forecasts based on 2021 data. Daily two way vehicle counts were recorded, revealing consistent weekday traffic peaks in the morning and evening on Monaro Highway, with mid-morning and afternoon peaks on Saturdays. It is noted that Old Cooma Road now shows more pronounced morning and evening peaks, likely due to the new residential development at Googong since 2021. Peak hourly volumes reached around 800 vehicles per hour on the Monaro Highway during weekdays. The data also highlight directional trends, with morning northbound and afternoon southbound traffic driving weekday peaks, while Saturday demand is more evenly distributed. This updated information will inform assessments of future traffic conditions, particularly during the project's construction phase.

The updated Assessment analysis compares the traffic growth on the Monaro Highway between 2021 and 2025, focusing on peak hourly volumes. Forecasts were based on an assumed annual growth rate of 2.9%, with actual 2025 survey data compared against these projections. Weekday peak traffic volumes in November 2025 closely matched forecasts, indicating the adopted growth rate was accurate. However, Saturday peak volumes were lower than predicted, suggesting slower growth on weekends. Further comparisons using observed growth rates show that weekday forecasts remain valid, while Saturday forecasts could be reduced to better reflect real trends. Overall, maintaining higher baseline forecasts for Saturdays ensures a conservative assessment of future project impacts.

4.2.22 Visibility

4.2.22.1 Landscape Impact

Representative Comment(s)

The visual assessment contained in the EIS is of limited values as it lacks depth of coverage and limited scope. The assessment while based on an established methodology does not appear to have been modified to integrate local landscape and landform condition.

The assessment investigations need to be based on viewers in more locations than just residential housing sites. The proposed quarry will be viewed from vehicles on roads and in paddocks, from horse riders in paddocks and on trails as well as walkers and hikers in open spaces.

The visual assessment in its limited scope ignores visual impacts on the Monaro Highway users.

The EIS lacks sufficient detail to evaluate if it is possible for the indicated construction modification to reduce the appearance of the site development activities and site rehabilitation measure to be successful.

Submission No. SE-95051483, Royalla

Response

RWC prepared a Visual Impact Assessment (hereafter referred to as RWC, 2025), located at Appendix F of the EIS, to satisfy the SEARs for the Project relating to visual impacts. The SEARs required an assessment of the likely visual impacts of the development (before, during and post-quarrying) on private landowners in the vicinity of the development and key vantage points in the public domain, with particular attention to any new landforms (Section 6.6.1 of the EIS), which RWC (2025) fulfilled.

The assessment defined the existing environment including key topographic conditions in the area, identifying potential visual impacts, identifying management and mitigation measures, and assessing the visual impact of the Project to residences (3 zones) assuming the proposed management and mitigation measures are implemented place. The assessment addressed the following matters for each zone:

- The sensitivity of the area to change considering:
 - Its scenic quality.
 - The distinctive landscape features and number of likely viewers.
- The predicted magnitude of visual change.
- The visual impact of the zones assessed.

RWC (2025) conclude that:

‘overall, the magnitude of impact is low or moderate given the distance between the Project Site and the closest residence and the project design choices and mitigation measures that have been proposed’.

In regard to visibility of the project from the Monaro Highway, Section 4.3 of RWC (2025) identified:

- the intersection and rail overbridge would be visible from the highway; and
- glimpses of the Quarry Access Road may be possible from the highway.

As a result, mitigation measures would include vegetation along the ACT section of Quarry Access Road planted to mitigate views from the Monaro Highway.

Representative Comment(s)

The proposed Visibility Barrier, while intended to screen the site, is itself a significant landform that will become a dominant feature of our landscape. We are concerned that its effectiveness is contingent on the successful establishment of vegetation, which is a long-term and uncertain process.

Submission No. SE-92388964, Royalla

Response

The Applicant recognises the concerns surrounding visibility of the Project. The purpose of the Visibility Barrier is to reduce the visibility impacts of the Project; however, it is recognised that the visibility barrier would still be visible in some areas which may not satisfy some community members. The location and size of the visibility barrier was considered and adjusted throughout the Project design process (see Section 2.8.3 of the EIS), with the final design informed by the following parameters.

- The final Quarry Access Road design.
- The outcomes of visual amenity analysis that demonstrated that the design would mitigate possible view of the project.
- Opportunities to avoid impacts to Box-Gum Woodland.
- Avoidance of a culturally modified tree.
- The need to balance visual mitigation with potential material storage and use needs for the operation.

The Visibility Barrier would be constructed in two stages, to an elevation of 880m AHD, and the southern face of the barrier would be progressively revegetated (as described in Section 6 of RWC, 2025). A Biodiversity and Rehabilitation Management Plan (BRMP) would be developed and, as stated in Section 6 of the VIA would include protocols for seed collection, species selection, planting and maintenance of revegetated areas that would inform the establishment and maintenance of revegetated areas. RWC have further recommended in Section 6.6.6 of the EIS that clear objectives and performance criteria are established in the BRMP to improve the success of vegetation establishment and other mitigation measures.

Representative Comment(s)

Our comments here mirror those on noise suppression. Users of the trail, in an otherwise rural setting, do not wish to feel they are walking/running/cycling alongside heavy trucks. The EIS reports up to 500 heavy vehicle movements per day, which means for an 8-hour day there will be

a truck on the road every minute. Installation of a fence on the west side of the access road would reduce rail trail user's views of truck movements. Furthermore, dense planting of appropriate plant species would enhance visual screening of, not only vehicles but also the proposed 3m high fence.

Monaro Rail Trail Inc
Submission No. SE-94822707, Steeple Flat

Response

As stated in the Section 4.9 of the RTA, the Quarry Access Road would cross the Goulburn Bombala Railway at a rail overbridge crossing to the east of Monaro Highway. The Goulburn Bombala Railway is not currently operating; however, the Monaro Rail Trail is currently under investigation as a possible development along the railway. If approved, the trail would span 213km from Queanbeyan to Bombala (Monaro Rail Trail Inc, 2026⁴). Snowy Monaro Regional Council have finalised funding for the Monaro Rail Trail in Bombala for approximately 3km, or as far as funding permits (Snowy Monaro Regional Council, 2024⁵).

As stated in Section 3.8.3 of the EIS, daily traffic would vary over the life of the project, depending on demand. The daily traffic level limits proposed for the Project are:

- 200 heavy vehicle laden loads.
- Not more than 25 laden loads in any given hour.
- Up to 50 laden loads of concrete despatched by concrete agitator.

Installation of a fence to the west side of the access road to reduce rail trail user's views of truck movements is not considered feasible as:

- development of the rail trail in the same section as the Quarry Access Road has not been approved; and
- the rail crossing/Quarry Access Road is a small part of the 213km long trail and not considered to have a large impact on the overall trail experience.

Visual impacts have been assessed according to SEARs requirements. Suitable mitigation measures have been identified and would be implemented, resulting in a low or moderate magnitude of visual impact for residents.

Representative Comment(s)

As the project develops the stock piles of stone and spoil will increase and the landscape will start to change,

Submission No. SE-93279457, Royalla

Response

The project would have a dedicated processing and stockpiling area. As described in Section 3.5.3 of EIS, the development of the processing and stockpiling area would be staged to allow for progressive expansion which would reflect operational requirements. Importantly, the Visibility Barrier would obscure the visibility of the area (see **Figure 3.2**).

⁴ [Home | Monaro Rail Trail](#)

⁵ [Monaro Rail Trail | Snowy Monaro Regional Council](#)

4.2.22.2 Light Pollution

Representative Comment(s)

increased noise and light pollution from headlamps during Winter.

Submission No. SE-93394963, Royalla

The light pollution alone will badly degrade the darkness of the sky, and dust will further degrade seeing conditions to the point where it is doubtful I will be able to contribute research. This proposal will impact important astronomical research that is part of a larger international effort.

Submission No. SE-94960958, Royalla

Response

The proposed Project hours of operation are presented in Section 3.12 of the EIS. Excluding maintenance requirements, the Project may operate in the early morning (5:00am) and after dusk (6:00pm) at some times of the year. To prevent lighting nuisance to nearby residents, all fixed lighting would be directed downward and shielded (see Section 6.6.4.1 of the EIS). Extensive light pollution is not anticipated from the Project, especially outside of operating hours.

5. Evaluation

5.1 Introduction

This section provides an update to the evaluation of the merits of the Project presented in Section 7 of the EIS. The review takes into consideration the matters raised in submissions and refinement to assessment since exhibition. In response to submissions received during the public exhibition of the EIS, a number of specialist studies and report updates have been made. A discussion on the suitability of the site and the public interest is also provided.

5.2 Biophysical Considerations

Section 3.3 describes the supplementary assessment that has been undertaken to refine and improve the assessment undertaken for the Project

Air quality – Refinement to the use of data for meteorological conditions and local topography as well as updated assessment of the use of diesel and odour resulting from asphalt production has improved the understanding of potential risks. The outcomes of assessment continue to demonstrate that the location of the Project Site and the 1.5km distance between private residences and the operating areas, equipment and other dust sources provides a buffer to any potential impacts. The local topographic features including hills and ridgelines also mitigates potential impacts. The siting of the Project supports the conclusion that predicted air quality outcomes would be acceptable and that health risks associated with particulate matter and respirable crystalline silica remain low and acceptable.

Noise – The Applicant has refined the proposed construction schedule to describe the likely timing and progression of construction activity. Importantly, when road construction is closest to private residences, noise from construction works may be heard and have the potential to exceed noise affected levels at some locations. These impacts would be mitigated through a range of measures and supported by community notification of when activity would occur and limits construction operating hours. The updated assessment of noise supports the conclusion that noise generated as a result of the operation of the Quarry is predicted to comply with the relevant assessment criteria at all private residences (within NSW and the ACT).

Surface Water – The surface water management strategy has been updated to allow for a higher level of stormwater storage capacity, with focus of management being the avoidance of discharge and water quality impacts. The Applicant has increase dam capacity in the operating areas. Measures would be implemented to ensure that water discharge is a last resort management measure with opportunities for reuse, including the irrigation of revegetated areas to occur before water is released to nearby waterways. Should it be required, any discharge of water would occur in accordance with the requirements of the NSW EPA including water quality parameters that would preferentially reflect the site and local water quality conditions. The additional storage has improved water supply reliability for the operation.

Biodiversity – The outcomes of biodiversity assessment have been refined to incorporate additional surveys for the Canberra Spider Orchid and microbats. These surveys did not identify flora and fauna that would change the overall conclusions to the assessment. A species-specific management plan has been developed for the Small Purple-pea (*Swainsona recta*) to present the

Applicant's intended management and monitoring of the species over the life of the Project. A total of 10 plants would be removed for the construction of the rail overbridge, however in excess of 150 plants would be managed to avoid indirect impacts and monitored. With the avoidance and mitigation measures in place for this species, it is considered that the impact risks would be managed. Reporting on the proposed monitoring would directly contribute to the Saving our Species program in place for this threatened plant.

Aboriginal cultural heritage – Additional subsurface investigations have been undertaken within the Project Site (including the ACT). The updated assessment has identified a number of additional artefacts that are consistent with artefacts found during field survey of the surface land. The investigations did not identify any subsurface archaeological deposits of cultural or scientific significance that could not be reasonably managed by the proposed mitigation measures. As a result, the conclusion to the ACHAR remains that there would be no significant risks of impact to Aboriginal cultural heritage as a result of development of the Project.

Traffic and Transportation – Additional traffic surveys were undertaken on local and State roads that would be used for the development to account for the time since the surveys relied upon in the Road Transport Assessment (TTPP, 2026) were undertaken. The updated surveys demonstrated that the traffic growth projections applied by TTPP were accurate if not conservative. Therefore, the conclusions to the Road Transport Assessment (TTPP, 2026) remain unchanged, that is, the proposed transportation activities would occur within the capacity of the road network and would not result in substantial delays during peak hour periods. The intersection design was determined in consultation with the ACT Government and support for the intersection configuration has been provided. The intersection configuration was chosen to ensure road safety considering road use on the Monaro Highway and peak travel conditions.

Land Use Conflicts – A Land Use Conflict Risk Assessment (LUCRA) has been prepared to consider risks of conflict with existing agricultural land uses as well as rural residential land use. Rural residential land use is taken to include large lot residential properties with domestic animals (including horses) and hobby farming and for which the outlook from properties (visual impacts) is important. In summary, the mitigation measures that would be applied for noise generation, dust and particulate matter dispersion, transportation and visual impacts would mitigate the risk of impact to agricultural and rural residential land use. Noise and views of construction activities remain a residual risk of impact as does views of transport activities during operations. Potential impacts during the construction period would be short term in nature, with road construction the most likely cause of noise. However, these activities would occur during the expected 2-month road construction period and would not be a long-term feature. The Visual Impact Assessment (RWC, 2025) considered possible views, including of transport activities, for properties in the vicinity of the Project Site and concluded that risks would be low to moderate assuming the mitigation provided. The Applicant maintains that although the Project represents a change, it would not represent an impediment to the ongoing use and enjoyment of rural residential land in the vicinity of the Project Site.

5.3 Economic Considerations

The economic outcomes for the Project remain unchanged. That is, the Project is economically efficient, regionally beneficial, and aligned with public interest objectives. The Economic Assessment predicted that the Project would deliver a net economic benefit of \$41 million to NSW.

Many of the submissions received questioned the need for the Project, given the existing quarries in the region. The assessment of the Economic Need for the Project (EcoRoc, 2025) identified that without any new hard rock quarry approvals, demand would exceed supply from existing reserves from 2029 onwards, with a cumulative shortfall of resource of approximately 41Mt by 2050. The assessment considered the sensitivity of this outcome to changes in the various assumptions made in assessing the outcome. It was concluded that even with variation to these assumptions, the shortfall in resource and projected demand supports the development of a new extractive industry resource in the region.

5.4 Social Considerations

The number of submissions objecting to the Project and the location of submitters in the areas in proximity to the Project Site indicate the level of local interest and concern in the community. The feedback received in submissions is consistent with the feedback received during consultation for the Project, as described in Section 5 of the EIS and in the Social Impact Assessment (Landscape Research, 2025).

The Applicant has taken into consideration the feedback from the community in its decision-making during Project planning and design. The consideration of alternatives described in Section 2.8 of the EIS is an important indicator of how the feedback received has informed decisions. Table 2.4 of the EIS describes the matters considered in determining the access arrangements for the Project. The primary driver for the selection of the location for the Quarry Access Road was the separation of transport activities from private properties and the likely long-term benefit of this option for the Applicant and the community, despite the higher cost to construct and complexity in development. The recent commitment to seal the first 120m of the Secondary Access Road from the intersection with Mates Drive was principally informed by the benefit to properties on Mates Drive for possible dust and noise generation.

The proposed Community Infrastructure Fund would enable delivery of priority projects in Royalla and surrounding areas. These may include recreational upgrades, environmental initiatives, or support for local events. The Fund is a tangible benefit that would be delivered for the community.

The Applicant recognises that social acceptability remains contested. The community has expressed a low level of confidence and trust in the Project. These concerns have informed decision making for the Project, including the comprehensive commitments to the management and mitigation of potential environmental risks. Environmental monitoring, adaptive management and regular reporting would ensure that any unexpected issues are addressed transparently and effectively. The Applicant recognises the need to earn, and maintain, community trust over the life of the Project.

5.5 Suitability of the Site

The Applicant remains confident that the location and design of the Project is highly suitable. Identifying a suitable (greenfield) site for extractive industry development requires consideration of the following matters.

- Resource quality and suitability for intended use.
- Connection to regional infrastructure such as roads but also water and power.

- Transport distance from the source to the intended use.
- Geology and physical features of the site including drainage and topography.
- Strategic planning provisions.
- Existing land use and risks of conflict.
- Environmental capacity of the setting and how the design can accommodate existing constraints.
- Available alternatives considering land availability and ownership, access and for any alternative, each of the above matters

The EIS and this *Submissions Report* has identified the Applicant's understanding of the resource, geology and physical features and how these have informed Project design and location. The existing environmental setting including climate patterns, watercourse and biodiversity and Aboriginal heritage values have also informed Project design and planning. The Project is permissible in this location and the zoning objectives for the land have informed Project design how the land would be managed over the life of the Project. The Applicant would also construct a dedicated Quarry Access Road that would be over 4km in length and direct vehicles to the west and away from residences to enter the public road network. The intersection with the Monaro Highway would be a safe and permanent access point that would separate vehicle traffic from local roads in Royalla.

It is appreciated that Royalla is considered a rural residential area and historic grazing land. The Project location has deliberately been selected as the closest private residence is 1.5km away and so that existing topography would shield all but the most distant of views. The Project is also located at a greater distance from residences than each of the existing quarries in the region (see **Figure 4.3** and **Figure 4.4**) and is likely to result in better outcomes for the local community compared to those operations.

The Cooma Road Quarry has been operating in the current location for many years and its operation continues to occur in a manner that is mindful of its place close to arterial roads and in proximity to the local community. The same approach is proposed for the Project, however the key difference between these projects is that the Project would be a modern operation and equally subject to the strict requirements and regulations applied for extractive industry projects in NSW. Considering the substantial separation from private residences, the detailed access arrangements and measures taken to avoid or mitigate impacts, the location of the Project Site is considered to balance environmental, social and economic outcomes well. The merit of the Project is firmly established by this and the evidence of technical assessments.

5.6 Public Interest

The principles of ecologically sustainable development require that a balanced approach to development is taken and that the outcomes reflect the interests of the State and serve the broader public interest. The Project is considered to be in the public interest as it has been designed to accommodate the preferences of the local community and would support the immediate need for resources as well as representing a long-term prospect to support the construction and infrastructure sectors in the region. Existing hard rock resources in the region are approaching

exhaustion and demand for construction material is expected to continue to grow as population increases and building methods transition to more structural concrete formwork. The Project has been designed to supply high-quality hard rock, concrete, asphalt, and recycled materials. The Project therefore represents an ideally located opportunity to replace existing sources and provide a range of services demanded by customers.

The technical assessments completed for the Project demonstrate that the residual impacts of the Project are acceptable. However, these assessment outcomes are not expected to satisfy all community members. The public objection to the Project is a demonstration of the concerns that remain. This *Submissions Report* has attempted to comprehensively respond to these concerns and outline the mitigation, management and monitoring that would be implemented over the life of the Project to track outcomes against predicted impact and present these to the local community. This would ensure that compliance is demonstrated and predicted impacts can be shown to be consistent with the predictions made in technical assessments. It is accepted that the Applicant would need to operate to ensure the presented outcomes are credible, information sharing is transparent and the Applicant is responsive to future engagement.

5.7 Conclusion

Monaro Rock is a locally owned and managed business whose owners and management live within the surrounding region. The people responsible for the Project are members of the same community that would be affected by the Project and have a genuine long-term interest in ensuring it operates responsibly. The Company's families and employees live in the area, and the expected customers would be local businesses and Councils. All concerns raised by the community will be addressed by people who are directly accountable and invested in maintaining positive long-term relationships with their neighbours.

The Applicant acknowledges the feedback from the community provided in submissions, noting that this was consistent with feedback received in community consultation during development of the EIS. Therefore, the concerns have informed decision-making and consideration of alternative options for development.

The Project would be the first 'greenfield' quarry development in the region in 25 years and the change to the local setting and the sense of place is challenging for some in the community. The Applicant is cognisant of this and believes the Project has been sited to avoid impact and that the commitments to management would mitigate environmental risks to the greatest extent possible. The Project is an opportunity for the development of a reliable, long-term supply of high-quality construction materials to support infrastructure and housing development in the Queanbeyan-Palerang and ACT regions. It would also deliver direct employment for up to 30 people and stimulate local supply opportunities, contributing to the economic resilience of the region.

The overall conclusion to this report remains unchanged from the EIS. That is, should the Project be approved it would represent a modern and responsible approach to resource development that would deliver substantial economic and social benefits while maintaining a strong commitment to environmental best practice. It is intended that the Project would provide lasting benefits for the region, and that the people who work to develop it would become a valued part of the community.

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