

24 November 2022

Mr Stephen O'Donoghue
Director Resource Assessment
Department of Planning & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Sent by email to: stephen.odonoghue@planning.nsw.gov.au
allison.sharp@planning.nsw.gov.au

Dear Stephen

Re: Albion Park Quarry – Stage 7 (SSD-10369) RFI - 11 November 2022

I refer to the Department's Request for Information RFI 2 dated 11 November 2022 in relation to further visibility matters for the above proposed development. The following provides a response prepared by Cleary Bros and RWC to both matters raised. The additional information requested is highlighted in *italics* with the response in a normal font.

Submit a visual assessment that considers potential views of the Holcim Albion Park Quarry once the proposed Stage 7E is quarried. The assessment should consider the visual impact from multiple viewpoints both before and after the quarrying of proposed Stage 7E. The assessment must include:

- *map of viewpoints able to view the Holcim Quarry*
- *visual transects from at least two of those locations*
- *visual montage for the selected locations that demonstrates the appearance of the Holcim Quarry*
- *assessment of the impact of any views identified by the visual assessment*

Response

The Holcim Albion Park Quarry is located on land adjoining and to the southwest of the western boundary of Cleary Bros' Albion Park Quarry Stages 1 to 6. **Figure A** displays the activity areas within Holcim's property with the two areas that are visible from the Shell Cove West, referred to throughout this response as the "Southern Area" and "Eastern Area".

The bulk of the Eastern Area has previously been extracted and the resulting void progressively backfilled with overburden positioned against the remnant pillar of rock between the Holcim and Cleary Bros' extraction areas. The landform within Holcim's backfilled area has been terraced downslope to the south towards the existing drainage line (Watercourse 2).

This response focuses upon the change in views of the Holcim Quarry Eastern Area between what is currently visible and what would be visible at the end of Stage 7e. Views of the Eastern Area from outside land owned by quarry operators is largely limited to the "Figtree Hill" property and the western sections of Shell Cove West. As Cleary Bros has a written agreement with the owners of "Figtree Hill" which addresses visibility-related matters, the assessment of visibility of the Eastern Area primarily focuses on views from Shell Cove West. A brief discussion is also provided regarding the visibility of the Southern Area from Shell Cove West.

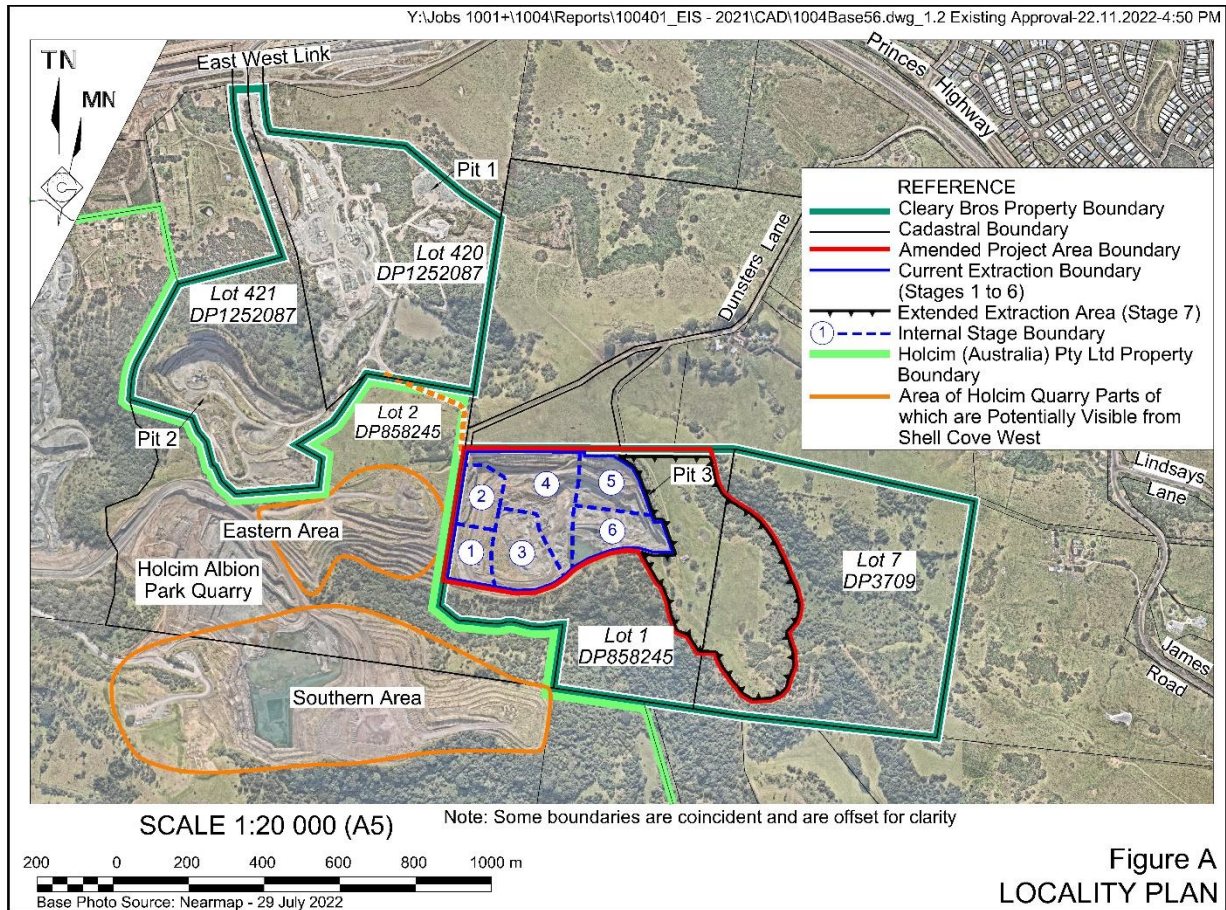


Plate A shows a recent photograph (captured 17 November 2022) from the eastern boundary of Stage 6 towards the elevated section of the revegetated overburden within the Eastern Area and the upper extraction faces within the Southern Area of Holcim’s Quarry.

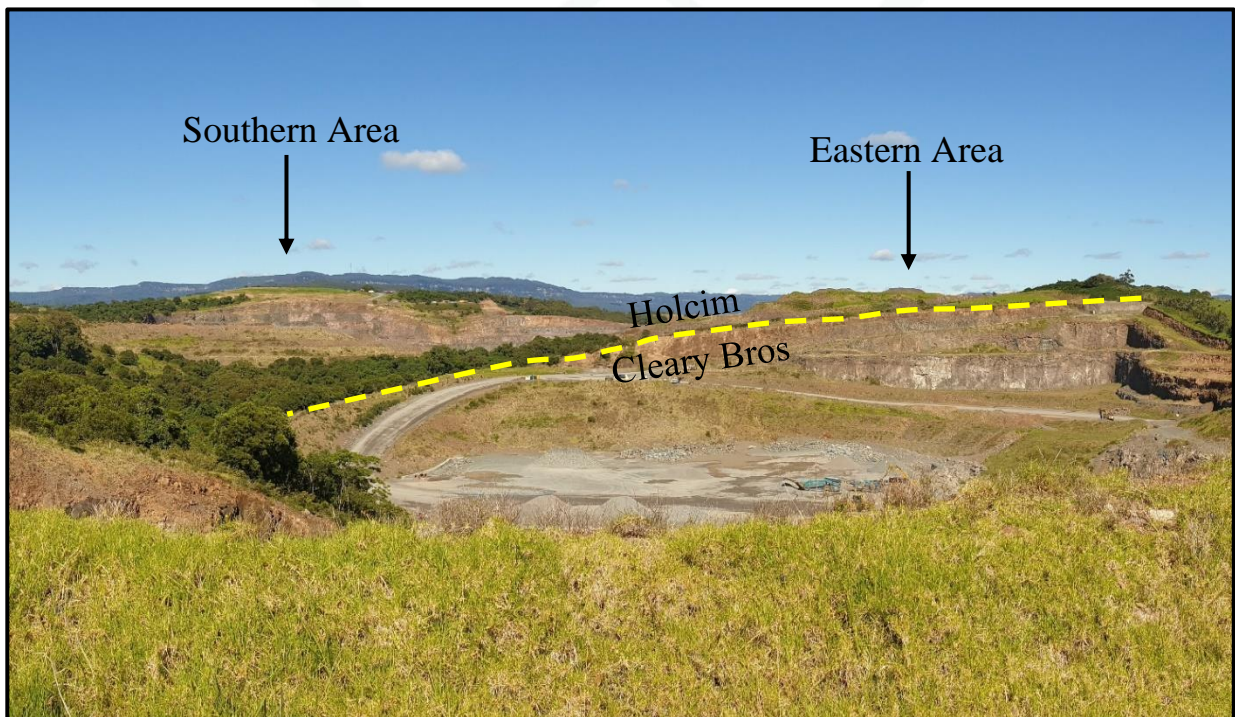


Plate A: A View to the West from Stage 6 towards the Holcim Albion Park Quarry

Figure B displays those areas surrounding the Holcim Quarry which can currently see the Eastern Area, alongside those areas which would be able to see the Eastern Area after the completion of Stage 7e. Of particular interest is the area east of the Princes Highway in the vicinity of Shell Cove West where three locations have previously been assessed as part of the Visual Impacts Assessment, namely Sites 3a and 5, and the proposed Shellharbour Hospital site.

Site 3a

Figure C displays the visual transect from Site 3a and the prepared cross-section which indicates that approximately 4m of the elevated section of the Eastern Area is just visible at present. Following the completion of extraction within Stage 7e, a further 8m (vertically) of the Eastern Area could be seen from Site 3a together with approximately 23m (vertically) of the rehabilitated sections of Stages 1 to 6 immediately in front of the Eastern Area. A photomontage from Site 3a (**Figure D**) displays both the existing view and the view after completion of extraction within Stage 7e, together with an enlarged inset of the visible component of the landform within the Eastern Area of Holcim's Quarry and the immediate foreground within Stages 1 to 6.

A comparison of the existing view from Site 3a towards the Southern Area within Holcim's Quarry and the view at the end of Stage 7e shows virtually no change to the views of the Southern Area. The existing vegetation immediately beyond the western boundary of Stage 7a that currently partly screens the elevated extraction benches in the Southern Area would be retained. Hence, there would be negligible change in the visibility of the Southern Area when viewed from Site 3a.

Site 5

Figure E displays the visual transect from Site 5 and the prepared cross-section which similarly shows that approximately 4m of the Eastern Area is currently visible. Following the completion of extraction within Stage 7e, the same area of Holcim's Quarry Eastern Area would be visible together with approximately 60m vertically of the backfilled, profiled and vegetated landform within Stages 1 to 6. **Figure F** presents the existing view from Site 5 and a photomontage of the view after completion of extraction within Stage 7e, together with an enlarged inset of the visible component of the landform within the Eastern Area of Holcim's Quarry.

A comparison of the existing view from Site 5 towards the Southern Area within Holcim's Quarry and the view at the end of Stage 7e shows that the Southern Area of Holcim's Quarry is outside, and to the south of the proposed Stage 7 operations. As such, there will be no change to the views of the Southern Area from Site 5.

Shellharbour Hospital

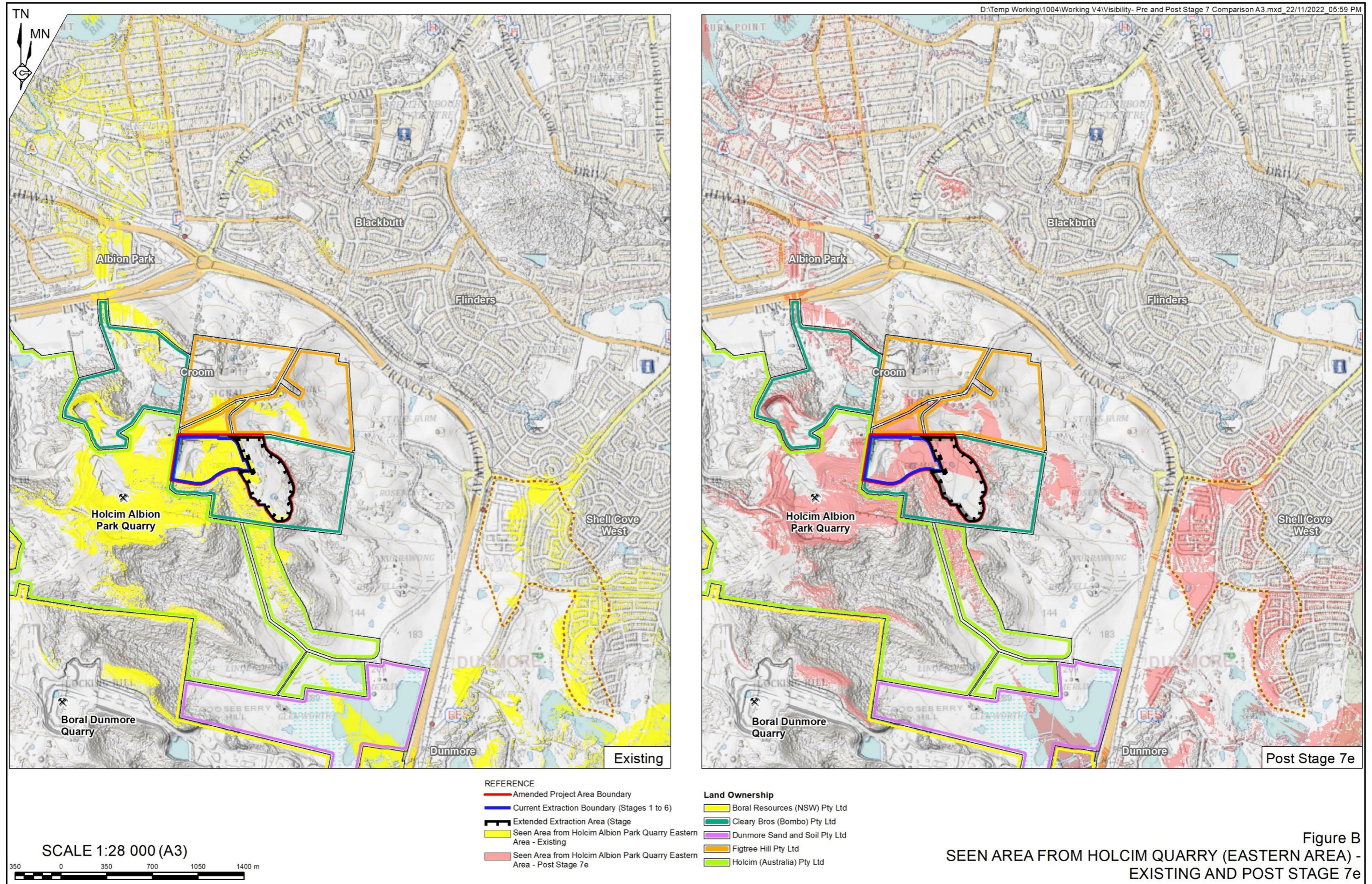
In addition to Sites 3a and 5 within Shell Cove West, an appreciation of the change in the visibility of the Eastern Area within Holcim's Quarry can be gained from the expected site of the proposed Shellharbour Hospital located approximately 260m south of Site 5. **Figure G** displays the visual transect from the proposed hospital site and the prepared cross-section which indicates that the surface of the Eastern Area is currently barely visible from the hospital site. The change in the visibility from the hospital site would occur during the extraction of Stage 7b when an additional approximately 8m of the Eastern Area would become visible from the hospital site. There would be no change in the extent of visibility of Holcim's Eastern Area from the proposed hospital site beyond Stage 7b. **Figure H** displays the existing view and a

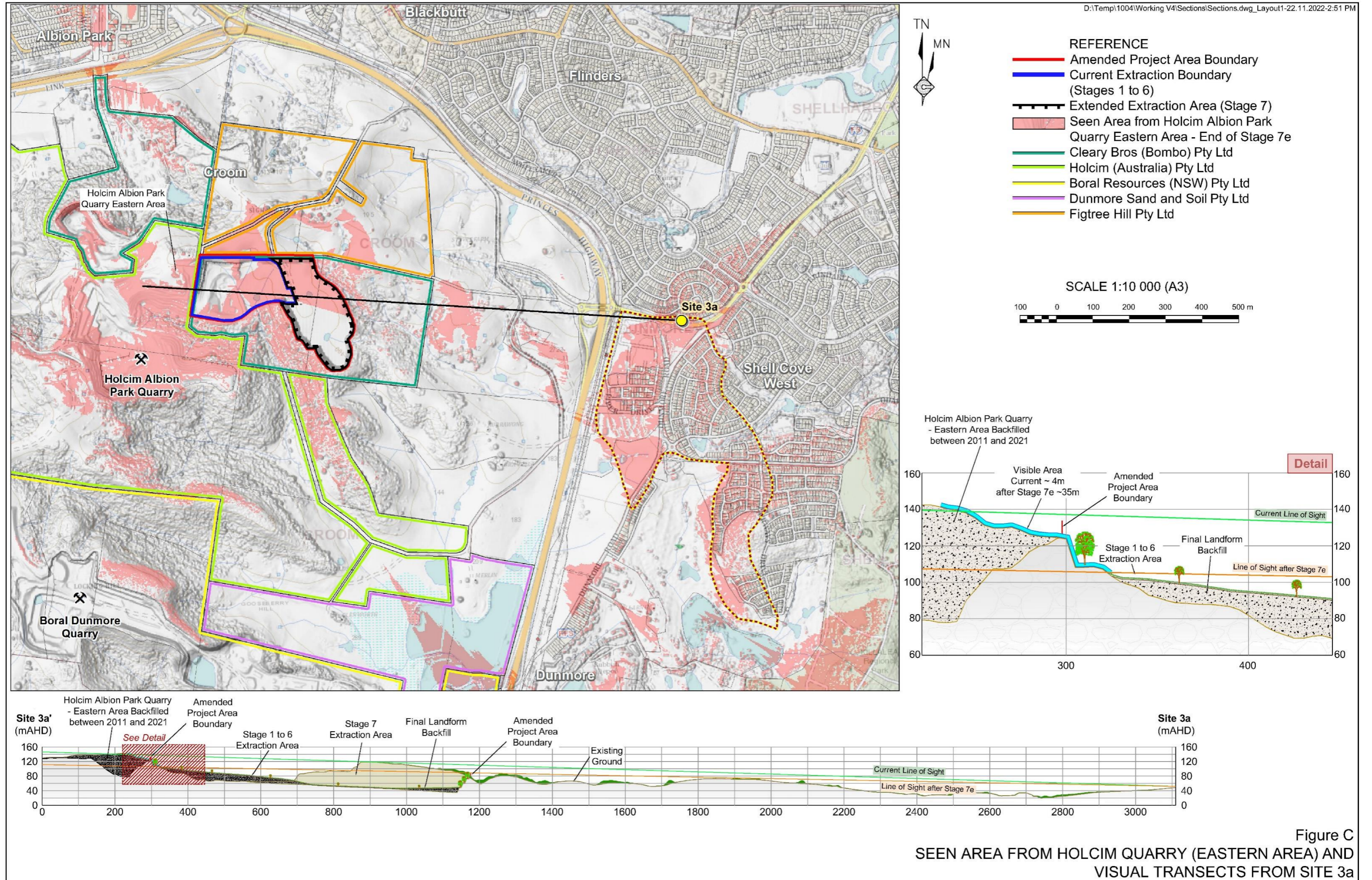
photomontage after the completion of extraction within Stage 7e, with minimal change to the view of Holcim's Quarry from the proposed hospital site due to the mature retained vegetation adjoining the western boundary of Stage 7a.

The visual transects, cross-sections and photomontages presented in **Figures B to H** effectively show that there would be minimal change in the views of the Eastern Area within Holcim's Quarry from surrounding areas as a result of extraction operations within Stage 7. The elevated section of the existing landform within the Eastern Area would remain visible to some surrounding areas whilst the remainder of the backfilled areas and other operational areas within the Holcim Quarry would remain hidden from areas to the east of the Princes Highway and within Shell Cove West.

It is recognised the views from Sites 3a and 5 would change during extraction within Stage 7e with a greater proportion of the revegetated final landform on the western side of Stages 1 to 6 becoming visible. That said, the contrast in colour of the revegetated landform within Stages 1 to 6 would be largely consistent with the surrounding native and pasture vegetation.

Cleary Bros' commitment to a high standard of rehabilitation prior to the extraction of Stage 7e appropriately balances the recovery of approximately 5.5Mt of strategically important extractive materials with the protection of the visual amenity of nearby communities.





Y:\Jobs_1001+1004\Reports\100401_EIS - 2021\CAD\Sections\Cross-sections.dwg_Photomontages-24.11.2022-4:58 PM

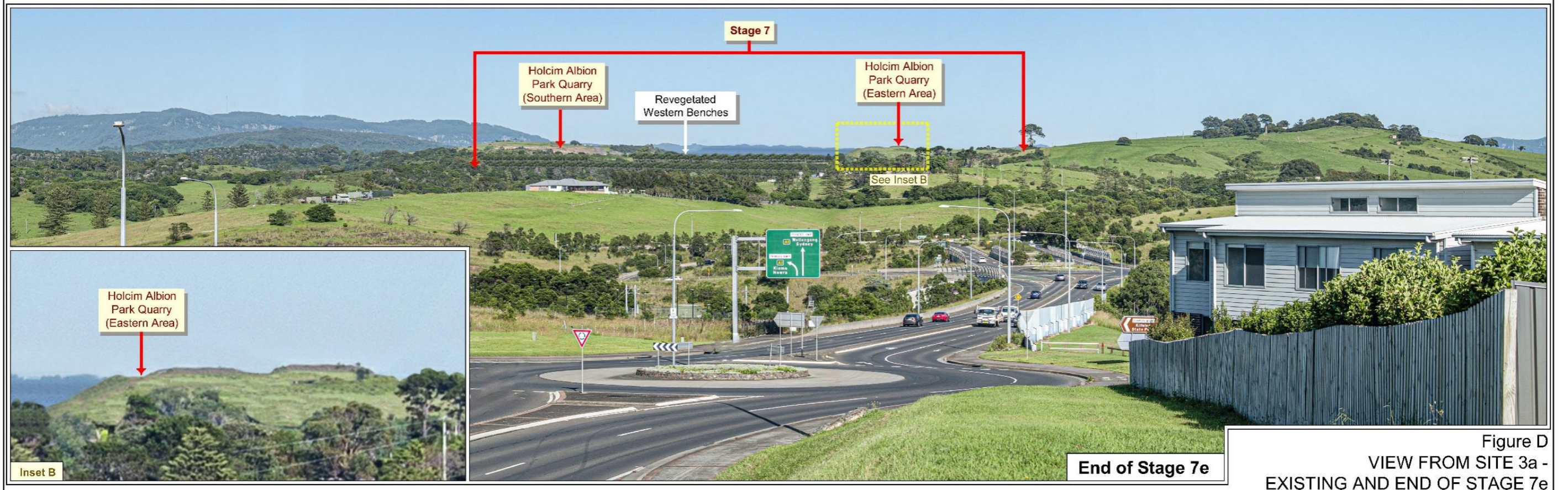
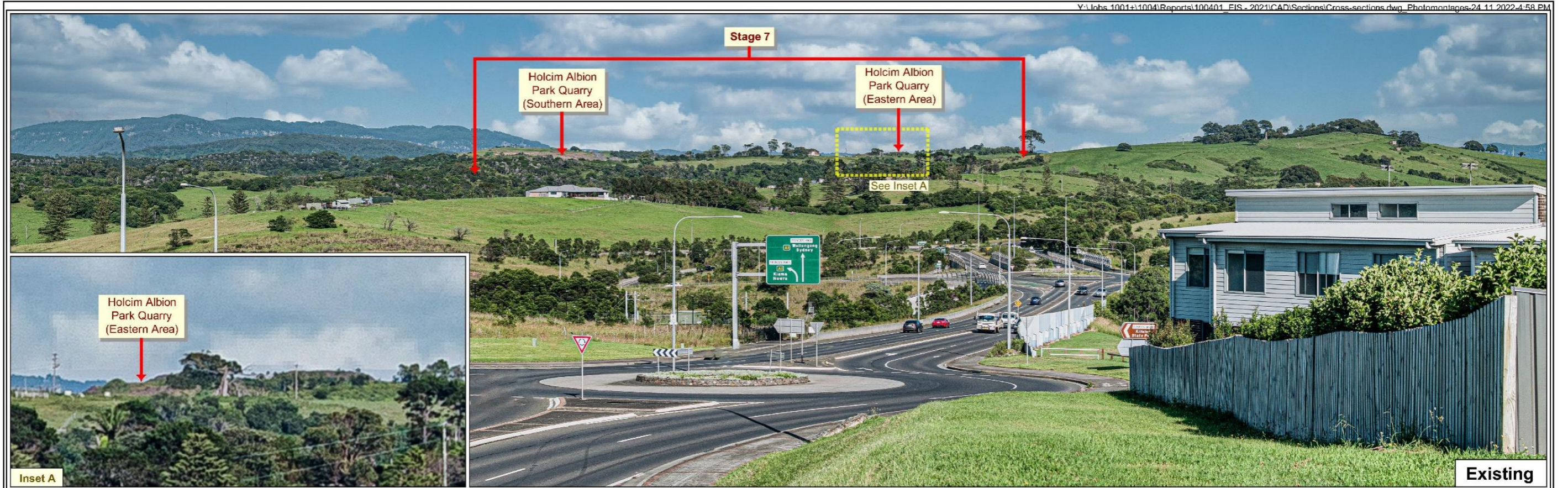
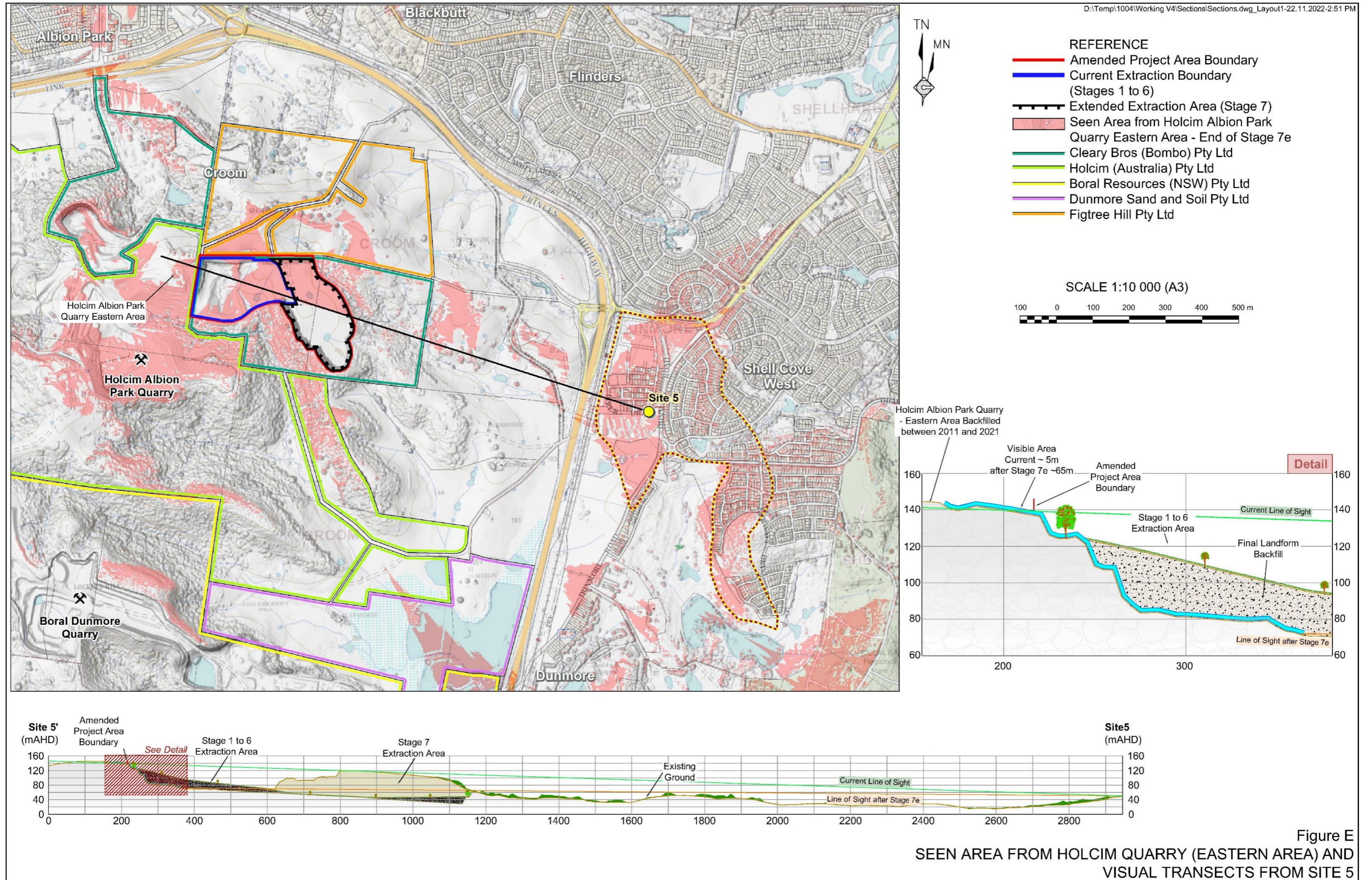


Figure D
VIEW FROM SITE 3a -
EXISTING AND END OF STAGE 7e



Y:\Jobs_1001+1004\Reports\100401_EIS - 2021\CAD\Sections\Cross-sections.dwg_Photomontages-24.11.2022-5:00 PM

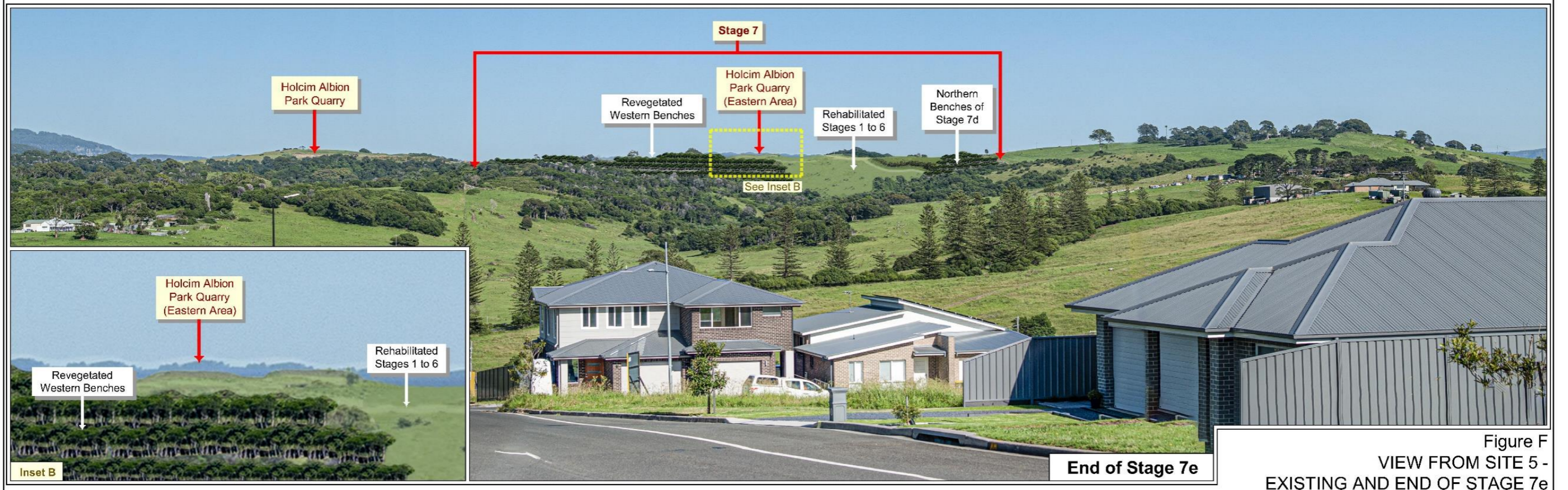
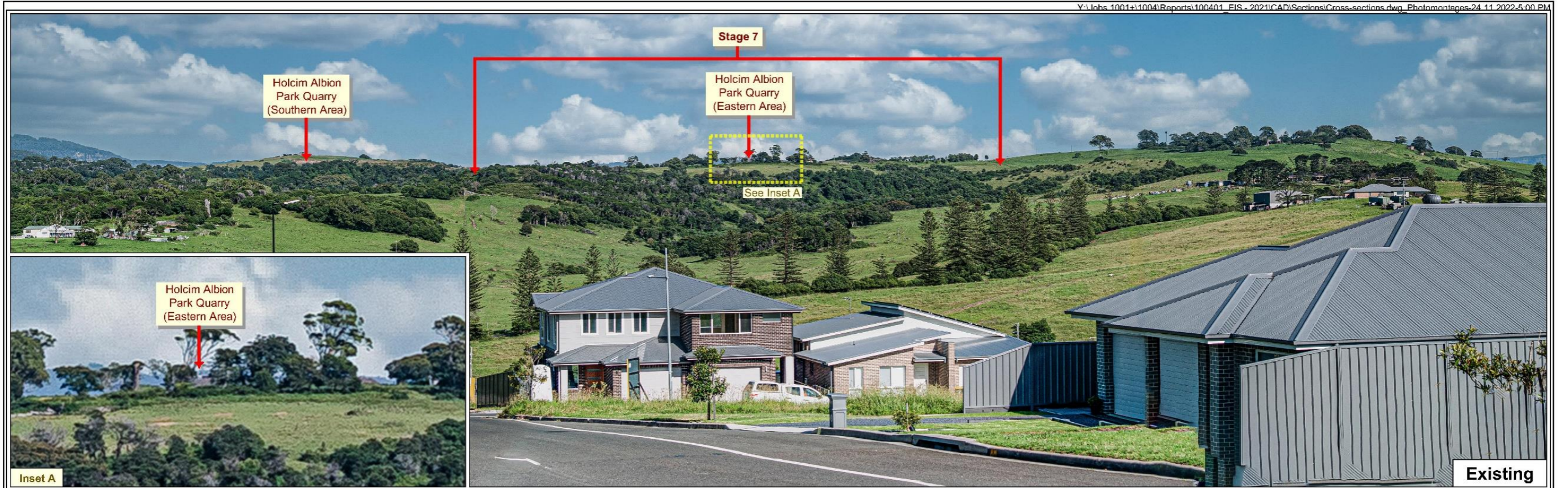
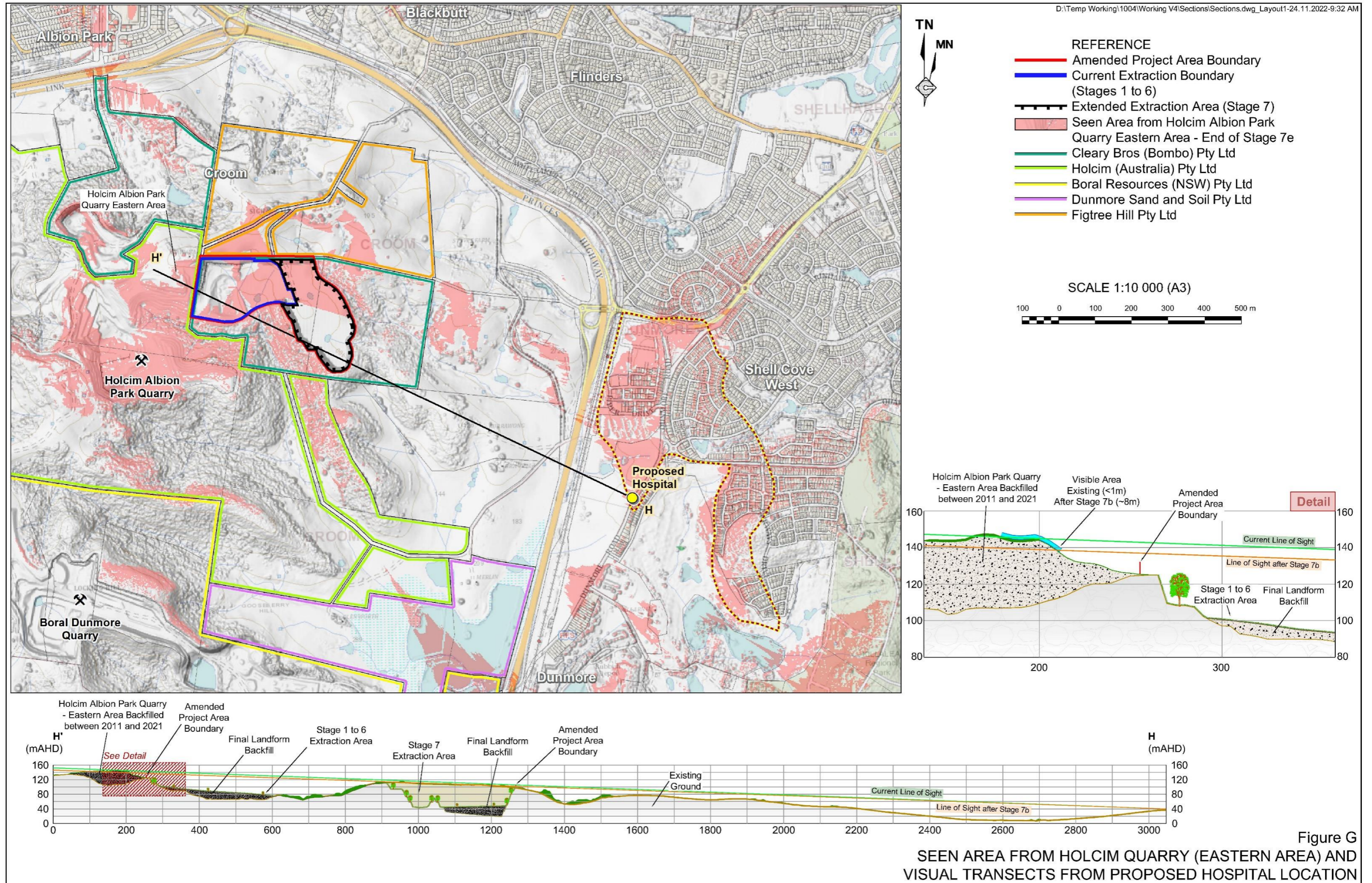


Figure F
VIEW FROM SITE 5 -
EXISTING AND END OF STAGE 7e



Y:\Jobs_10013\1004\Reports\100401_EIS - 2021\CAD\Sections\Cross-sections.dwg_Photomontages-24.11.2022-4:10 PM

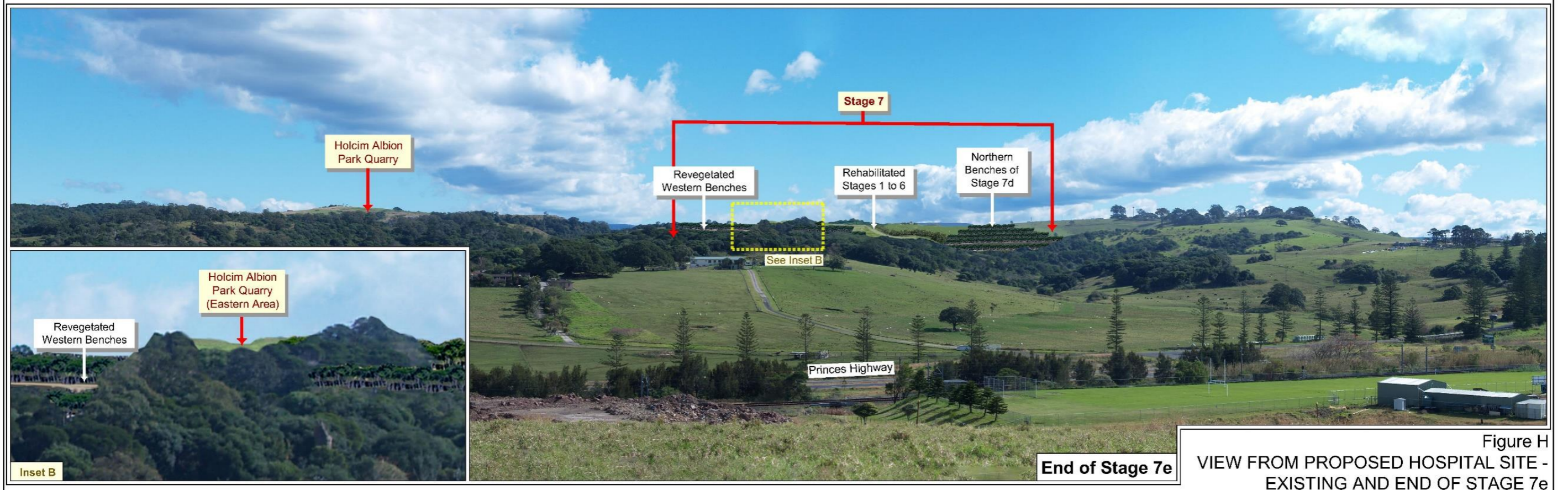
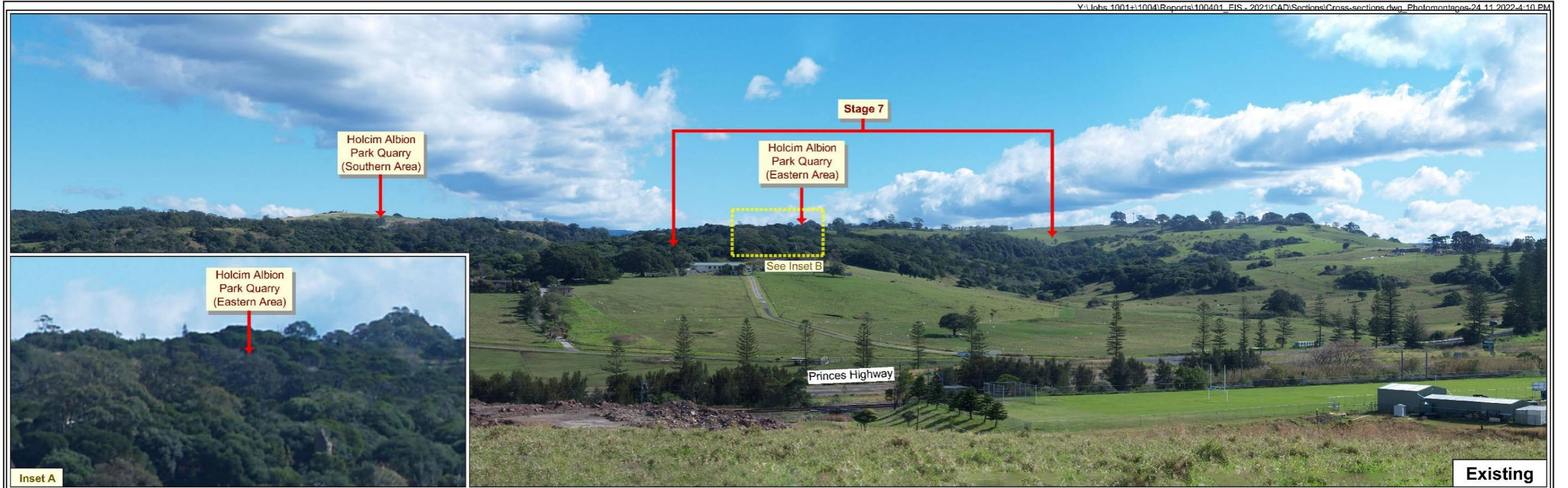


Figure H
VIEW FROM PROPOSED HOSPITAL SITE -
EXISTING AND END OF STAGE 7e

Submit a visual transects demonstrating the views from homesteads listed as heritage items under the Shellharbour Local Environmental Plan 2013, including:

- “St Ives” – 2 James Road Croom (Residence 4)
- “Rosemont” – 35 James Road Croom (Residence 9)
- “Kurrawong” – 126 James Road Croom (Residence 6)

Response

Figures I, J and K present the seen area analysis from the three nominated listed residences together with a visual transect and cross-section from each residence towards the most potentially visible area of the Stage 7 extraction area. An inset is also provided to assist in the appreciation of each residence’s surrounds and the nearby vegetation and buildings already existing within the view from each residence. The following conclusions are drawn as a result of the information presented on these figures.

- “St Ives”** The cross-section from “St Ives” shown on **Figure I** displays that the existing intervening topography between the residence and Stage 7 would prevent any views of the activities or final faces within Stage 7.
- “Rosemont” -** The cross-section from “Rosemont” shown on **Figure J** identifies that the Stage 7 Extraction Area is currently visible from the residence. In the short term, i.e. for the first half of the Project life, the amenity barrier and tree screen on the eastern side of Stage 7a would visually shield the activities/operational extraction area from “Rosemont”. Following extraction of Stage 7e, the seen area analysis identifies that the northwestern corner of Stages 1 to 6 would be visible from “Rosemont”. The extent of visibility is displayed on the cross-section which shows a vertical distance of approximately 40m of the final vegetated landform in Stages 1 to 6 would be visible from the residence. The nature of the view from “Rosemont” would be similar to that displayed in **Figure F** from Site 5, with the exception that the section of the Stages 1 to 6 revegetated final landform that would be visible would be smaller.
- “Kurrawong” -** The cross-section from “Kurrawong” shown on **Figure K** displays that the existing intervening topography and vegetation between the residence and Stage 7 would prevent any views of the activities or final faces within Stage 7.

Finally, it is noted that the conclusions presented in this document are largely consistent with the Visual Impacts Assessment presented in the EIA and *Amendment Report*.

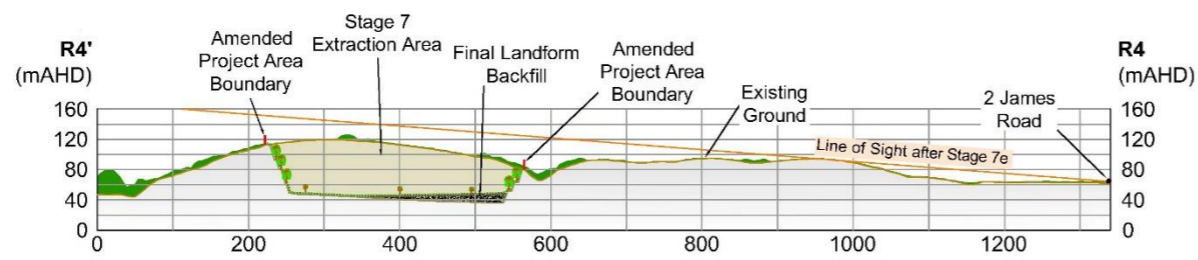
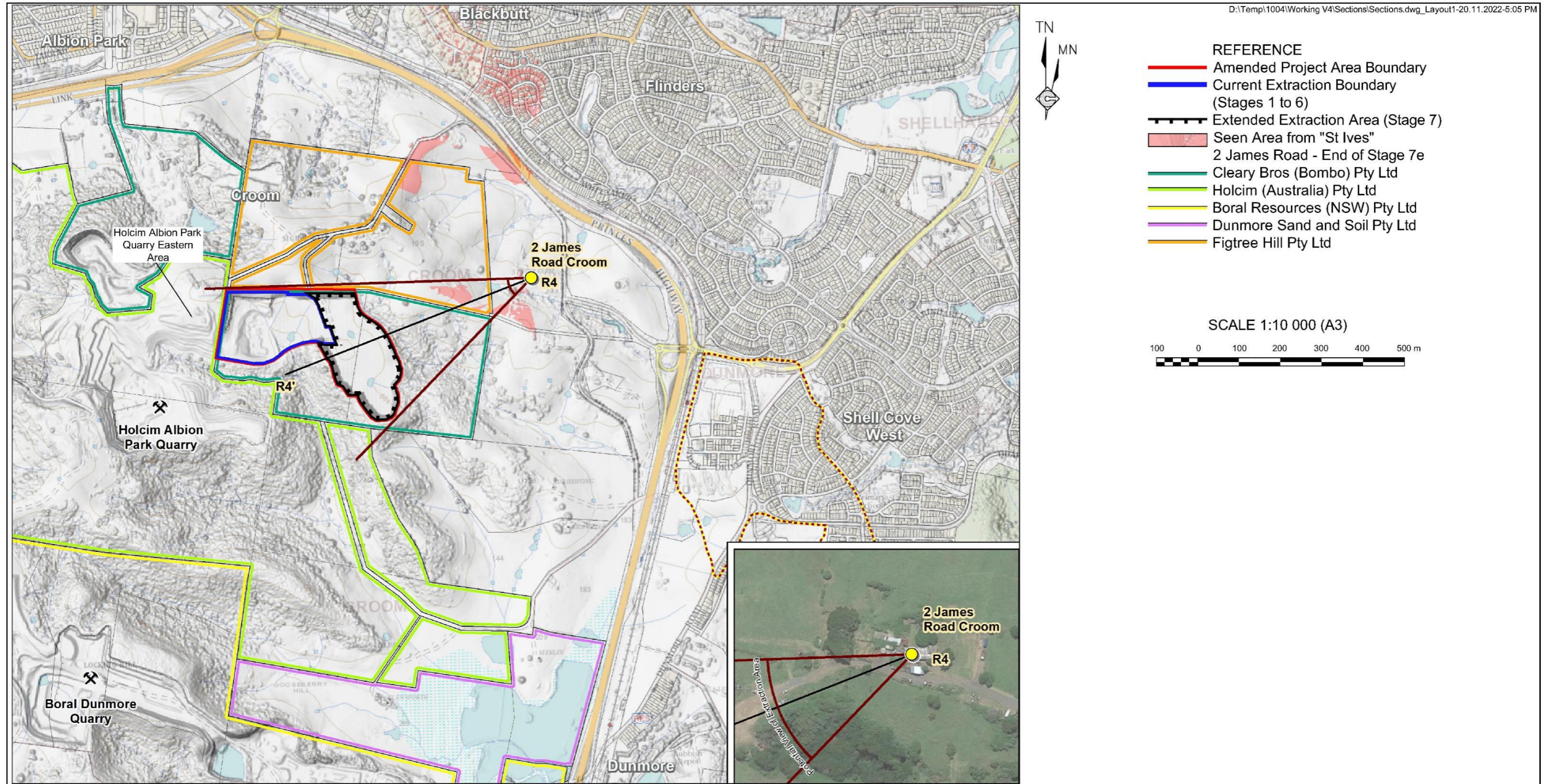
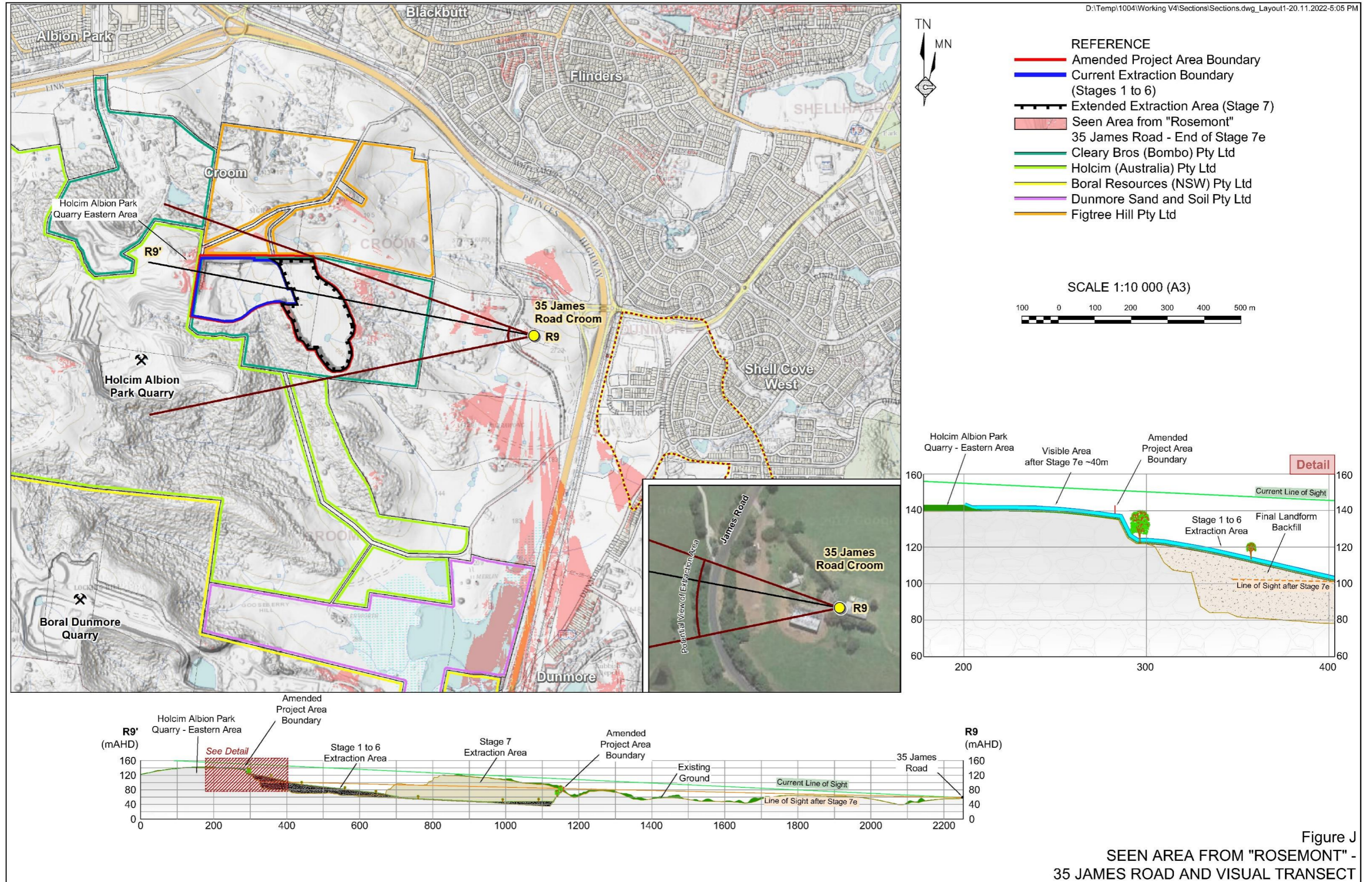


Figure 1
 SEEN AREA FROM "ST IVES" -
 2 JAMES ROAD AND VISUAL TRANSECT



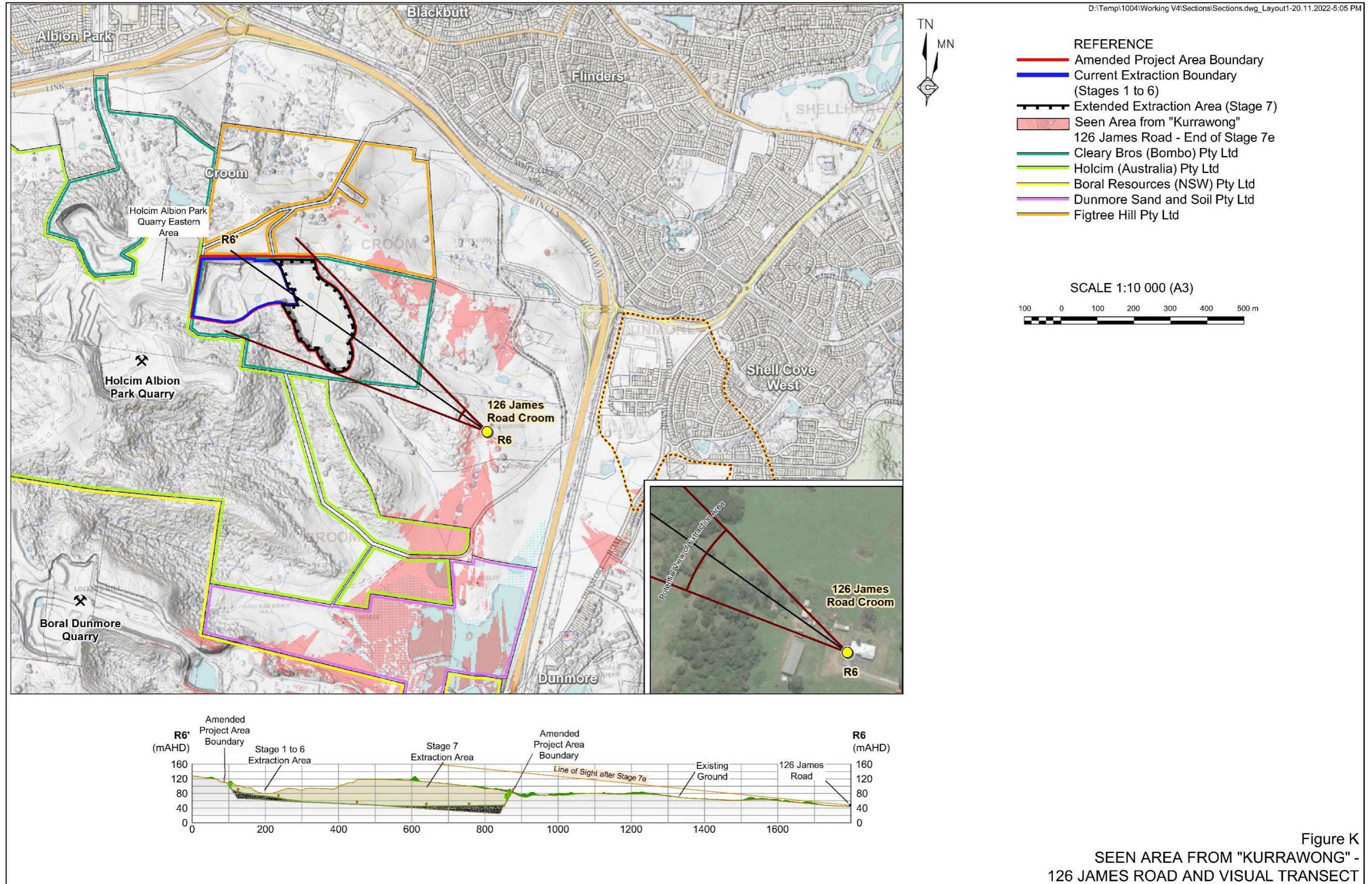


Figure K
SEEN AREA FROM "KURRAWONG" -
126 JAMES ROAD AND VISUAL TRANSECT

Concluding Comments

In conclusion, the *Shellharbour Local Environmental Plan 2013* clearly recognises the importance of the extractive materials within the Mineral Resources Area of the Dunmore-Shellharbour Hills as a State Significant Resource Area first defined back in the mid-20th Century and continuously documented in planning instruments since. Section 2.19 of the *State Environmental Planning Policy (Resources and Energy) 2021*, requires a consent authority to consider whether development, including residential and other development in the vicinity of a State Significant Resource Area would have a significant impact on current or future recovery of extractive materials. As Stage 7e is located wholly within the defined mineral resource area in the LEP (see EIS Figure 2.2), Cleary Bros contends that it would be contrary to the intent of Section 2.19 to permit minor changes to visual amenity within Shell Cove West to impact on recovery of the approximately 5.5Mt of high quality extractive materials within Stage 7e. This is particularly as the Mineral Resources Area was identified well before residential and associated development commenced in Shell Cove West. Notwithstanding this, Cleary Bros has given considerable attention to visibility mitigation measures and has sought to mitigate those measures to the greatest extent practicable.

Furthermore, the *Illawarra-Shoalhaven Regional Plan 2041* released in May 2021 acknowledges the high value of hard rock resources in the Dunmore-Shellharbour Hills area and the benefits to the local economy from its continued extraction. Unlike the other major quarry operators in the Dunmore-Shellharbour Hills Area, Cleary Bros is a locally based company that sells the vast majority of its products into the Illawarra-Shoalhaven region and Wingecarribee local government area.

It remains Cleary Bros' position that its commitment to successful rehabilitation within Stages 1 to 6 and 7a prior to the commencement of extraction in Stage 7e is entirely appropriate given the changes in visibility of the rehabilitated sections of the overall extraction area would not be strikingly obvious and would by far reflect best practice for quarries in the Dunmore-Shellharbour area. The proposed changes in visibility as a result of the extraction of rock from Stage 7e are considered appropriate given approximately 5.5Mt of latite and agglomerate would be recovered during this stage.

I trust this information satisfies your enquiry for the additional information. Should you have any questions regarding this information, please don't hesitate to contact Mark Hammond or myself.

Yours sincerely



Mitchell Bland

Managing Director/Principal