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17 August 2023  
Ref: 740\_DA5\_320\_008

Office of the Coordinator General  
Department of State Development,  
Infrastructure, Local Government and Planning  
PO Box 15517  
City East Queensland 4002

Attn: Amanda Koenig – Principal Project Officer  
Via Email: [SDAinfo@coordinatorgeneral.qld.gov.au](mailto:SDAinfo@coordinatorgeneral.qld.gov.au)

Dear Sir/Madam

## **RESPONSE TO REFERRAL ENTITY INFORMATION REQUEST LETTER**

### **DEVELOPMENT APPLICATION FOR A MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR EXTRACTIVE INDUSTRY AT THE EXISTING BROMELTON NORTH QUARRY ON LAND SITUATED OFF SANDY CREEK ROAD, BROMELTON, QLD 4285, PROPERLY DESCRIBED AS LOT 1 ON RP98576**

#### **OFFICE OF COORDINATOR-GENERAL REF. AP2022/022**

On behalf of the Neilsen Group Pty Ltd ('Neilsens'), the applicant for the abovementioned application, Groundwork Plus provides the following response to the Referral Entity Information Request letter issued by the Office of the Coordinator-General ('Office of CG') on 15 June 2023.

In accordance with Schedule 2, Part 2, Section 2.2 (4)(b) of the *Bromelton SDA Development Scheme 2017* ('Development Scheme'), this letter comprises a response to all the items raised by the referral entities, requiring additional information. Each item has been re-stated below, with a corresponding response in sequence.

## **1 Referral Entity Items – SEQ Water**

### **Stormwater Quality**

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#### **Information Request Item 1 Stormwater Management**

##### Information Requested:

*The Environmental Management Report (Groundwork Plus, dated December 2022 (Issue 3)) includes a basic Stormwater Management Plan Drawing; however this document lacks the level of detail expected*

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for a development of this type and scale. No detailed site-based stormwater design information or calculations have been included in this document.

*It is considered appropriate that the release limits during large storm events should meet the Water Quality Objectives for drinking water quality outlined in the Environmental Protection (Water and Wetland Biodiversity) Policy 2019 Schedule 1 for the Logan River.*

1) **The proponent is requested to provide:**

- a. *a comprehensive Site-Based Stormwater Management Plan (quality and quantity) that details:
  - i. *stormwater management over the proposed stages of development*
  - ii. *design information and justification of basin sizing (for both existing and new basins) to demonstrate how construction throughout development will be managed to protect drinking water supply Environmental Values and facilitate the Water Quality Objectives for the Logan River basin and achieve compliance with Performance Outcomes PO7 and PO8 of the Seqwater Development Guidelines for both construction and operational phases*
  - iii. *the number of existing and proposed discharge points as well as release limits*
  - iv. *achievement of the stormwater management design objectives outlined in the State Planning Policy, Appendix 2, Table B and be prepared by a Registered Professional Engineer of Queensland.**

Item 1 Response:

Bromelton North Quarry operates pursuant to an Environmental Authority ('EA') which currently contains 23 'Water Conditions'. WA1 relates to contaminants not being directly or indirectly released from the premises to any bed and banks of waters, while WA2 relates to preventing and/or minimising the release of contaminated runoff to waters. The conditions are somewhat contradictory.

While condition WA1 of the common conditions restricts the release of contaminants to waters, it does not prescribe criteria relating to water quality in the event of a release. Any release from the site will occur on the northern boundary, at either location W1 (the sediment pond), or the East Gully. Releases will enter a large, grassed area, before crossing the unsealed Corcoran Road, entering Swan Creek. Swan Creek flows to a series of constructed dams located within the adjoining property thence the Logan River. Upstream environments from W1 and the East Gully include Swan Creek and Sandy Creek, which both flow to the Logan River (refer **Figure 1**).



Figure 1: Tributaries

A search of the Department of Environment and Science ('DES') *Environmental Protection Act 1994 Public Register* has been carried out to compare discharge conditions for similar operations within the eastern Logan River catchment, with comparable the environmental values and mapped in the lowland freshwater region.

This search identified that the adjacent Bromelton Quarry (EA ref: EPPR00473413) has nominated performance targets as replicated in **Table 1**.

Table 1 – Amended Nominated Performance Targets

Parameter	Units	Minimum	Maximum	Monitoring Frequency
pH	-	6.5	8.5	Quarterly *
Turbidity	NTU	-	Must not exceed 2 NTU above a background value** where the background value is less than 20 NTU or 10 percent greater than a background value where the background value is greater than 20 NTU.	Quarterly *
Salinity	-	-	Not visible or otherwise noticeable	Quarterly *

\*If no discharge occurs from the final stormwater management pond during a quarter then no monitoring is required.

\*\*A background value is the value obtained for a water quality characteristic at a sampling point located in the receiving waters at an upstream location unaffected by the ERA.

It is acknowledged that the inclusion of release limits, within the EA, would provide Neilsens, DES and the Coordinator-Generals Office with improved clarity with regard to site discharge requirements. An EA Amendment will be made to DES in due course.

A Stormwater Management Plan has been prepared for the site (refer **Attachment 1 – Stormwater Management Plan**). This SMP has identified stormwater quality and quantity management for the ultimate quarry footprint. Given the current extent of extraction area, it is proposed to extend to the maximum disturbance area on commencement under any SDA Approval. For the purposes of the SMP, these performance targets have been adopted with a monitoring frequency of monthly, rather than quarterly.

The WQO will be further assessed and refined through a subsequent amendment to the current EA. It is suggested that any inclusion of release limits and monitoring within any SDA Approval would duplicate a matter which is presently regulated by DES, and will be further clarified through the EA amendment process.

As detailed in response to Item 5, no objection is held to a condition being imposed on any SDA Approval requiring a Water Quality Monitoring Program to be prepared and submitted to the satisfaction of the Coordinator-General prior to commencement.

### ***Erosion and Sediment Control Plan***

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#### ***Information Request Item 2. Erosion and Sediment Control***

##### *Information Requested:*

*Whilst mention of erosion and sedimentation control has been made in the Environmental Assessment Report, no erosion and sediment control plan has been provided with the application material. Given the nature and scale of the proposed extraction, processing and general operations across the site, it is considered appropriate to provide an erosion and sediment control plan.*

2) ***The proponent is requested to provide:***

- a. *a detailed erosion and sediment control plan addressing*
  - i. *Acceptable Outcomes AO7.1 to AO7.3 or Performance Outcome PO7 of the Seqwater Development Guidelines*
  - ii. *the plan/drawing must detail the location of physical controls / drains / swales / silt traps etc and the design details for these components.*

##### *Item 2 Response:*

An Erosion and Sediment Control Plan has been prepared to address the Seqwater Development Guidelines and provide the location and design details of the of the required erosion and sedimentation control components (refer **Attachment 2 – Erosion and Sediment Control Plan**).

## **Long Term Rehabilitation Plan**

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### **Information Request Item 3 Long Term Rehabilitation**

#### Information Requested:

Approved rehabilitation strategies for the site are designed to be undertaken progressively with the extraction. Whilst the Rehabilitation Management Plan and Conceptual Rehabilitation Plans (Environmental Management Plan, prepared by Groundwork Plus, dated December 2022, section 4.7 and Attachment 3) outline a new, end of operations rehabilitation strategy, no details have been provided on the progress of the approved progressive site rehabilitation works to date. The Consent Order includes an approved staged rehabilitation plan, aligning with the progressive stages of extractive activities. From aerial photographs, extractive activities appear to have occurred up to stage 4, possibly stage 5. It is unclear whether rehabilitation has been conducted in conjunction with each stage of development and to the appropriate extent as approved in the approved rehabilitation plans (DWGs 740.013 to 740.016 and 740.019 (Stages 1-5, 5 pages) prepared by Kershaw and Co, dated 14/8/1993).

3) **The proponent is requested to provide:**

- a. *the latest completed stage of development that has occurred over the site in accordance with the existing Consent Order for the site*
- b. *confirmation that rehabilitation works have occurred in accordance with the approved rehabilitation plans for the corresponding extraction stage*
- c. *if no progressive site rehabilitation has occurred to date, please outline the reasons why this has not occurred in accordance with the approval and provide details of remedial rehabilitation works that will occur prior to the proposed expansion, to achieve compliance and to support the proposed additional activity.*

#### Item 3 Response:

As detailed in the Response to Further Information request letter to Office of CG, dated 28 April 2023, a rehabilitation plan has not been approved by Scenic Rim Regional Council ('Council') to date. Progressive rehabilitation has not commenced on the site for a number of reasons, including the current status of terminal bench, management of site stability and ongoing extraction within each pit.

It is understood that Council holds rehabilitation bonds for Stages 1 – 3, which are expected to be released at commencement under any new SDA approval.

The Concept Rehabilitation Plan for the Bromelton North Quarry (Drawing No. 740.DRG.443R2) has been prepared as part of Attachment 3 within **Attachment 3 – Environmental Management Plan**. As depicted within this drawing, an area within the southern portion of the western pit has been intentionally excluded from the plan as Neilsens have been working with various authorities, including DES, to respond to site stability within this section the pit. A preliminary backfill design has been prepared which shows the generally agreed form amongst the relevant authorities of how this section of the pit will be remediated (refer **Attachment 4 – Generally Agreed Backfill Design**). Once this design has been finalised by these authorities, the Concept Rehabilitation Plan as part of Attachment 3 within the Environmental Management Plan ('EMP') will be updated to incorporate this backfill design.

Filling of the west pit has recently been completed (refer **Figure 1**).





October 2022 – West Pit (looking west)



June 2023 – West Pit fill complete (looking east)

*Figure 2: West Pit Filling Complete*

Commencement of rehabilitation works on the upper terminal benches will commence over the next 6 months. As agreed with Council and DES, this will occur under the direction of geotechnical engineers.

### ***Workshop/Refuelling Area***

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#### ***Information Request Item 4 Workshop/Refuelling***

##### *Information Requested:*

*The existing operations include a workshop for the servicing of vehicles and heavy machinery used on the site, which is not proposed to be changed as a result of the current application. This is located in the parking and administration area of the site, near the entry. It is unclear where refuelling of vehicles currently occurs on the site. The Environmental Management Plan (Groundwork Plus, December 2022) contains generic details on the construction and management of workshop / refuelling areas and controls for spills / refuelling etc.*

**4) *The proponent is requested to provide:***

- a. details of the existing workshop and refuelling areas, including basic floor plans and details on how oils, hydrocarbons, petrochemicals etc are captured, contained, separated and disposed of during the servicing and refuelling of vehicles*
- b. details of hardstand floor types, bunding style, any weatherproofing and storage areas for fuels/oils etc*
- c. details on the type and location of chemical /hazardous materials storage areas / facilities*
- d. confirmation that these are compliant with the latest Australian Standard, AS1940:2017.*

Item 4 Response:

The fuel storage located on the site comprises a 20,000L self-bunded transtank, as well as two (2) drum-storage structures located adjacent to this tank. Both of these structures are concrete bunded, with no visible cracks or gaps and are also roof-covered to ensure that the materials stored within the structures are not exposed to rainwater. These hazardous materials storage structures are considered to be in good condition and were constructed to meet the Australian Standard, AS1940:2017 construction requirements.

Drawings which are reflective of the hazardous materials storage structures have been prepared to demonstrate that the construction standards are aligned with those outlined in AS1940:2017 (refer **Attachment 5 – Hazardous Materials Storage Structures**).

**Water Quality Monitoring**

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**Information Request Item 5 Water Quality**Information Requested:

*No detailed water quality monitoring program has been provided, outlining the regular and events-based collection and testing of water samples in the sedimentation ponds and at discharge points.*

**5) The proponent is requested to provide:**

- a. *a dedicated surface water quality monitoring program prepared by a suitably qualified professional detailing:*
  - i. *demonstration that, at a minimum, that site discharges will meet the TSS, pH, electrical conductivity, dissolved oxygen and colour water quality objectives detailed in the Logan River Basin Environmental Values and Water Quality Objectives (noting where multiple environmental values are applicable the most stringent water quality objective is utilised)*
  - ii. *water quality characteristics, monitoring locations, monitoring frequency, release limits and responsibilities*
  - iii. *regularity of testing should be at least monthly and should include major rainfall events and at the time of releases.*

Item 5 Response:

As detailed in response to Item 1, Bromelton North Quarry operates pursuant to an EA which currently contains 23 'Water Conditions'. WA1 relates to contaminants not being directly or indirectly released from the premises to any bed and banks of waters, while WA2 relates to preventing and/or minimising the release of contaminated runoff to waters.

It is acknowledged that the inclusion of release limits, within the EA, would provide Neilsens, DES and the Coordinator-General's Office with improved clarity with regard to site discharge requirements. An EA Amendment will be made to DES in due course. It is suggested that any inclusion of release limits and monitoring within any SDA Approval would duplicate a matter which is presently regulated by DES and will be further clarified through the EA amendment process.

No objection is held to a condition being imposed on any SDA Approval requiring a Water Quality Monitoring Program to be prepared and submitted to the satisfaction of the Coordinator-General prior to commencement.

## **Sludge Removal and Disposal**

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### **Information Request Item 6 Sludge**

#### Information Requested:

The Consent Order conditions require that sedimentation basins are de-sludged once 30% holding capacity has been lost. Minimal details on sludge generation, storage, handling and disposal have been provided in the Environmental Management Plan, Waste Management Plan, section 4.6 (Groundwork Plus, dated December 2022).

6) **The proponent is requested to provide:**

- a. details on the typical frequency of de-sludging, including quantities, where and how sludge collected from sedimentation basins will be stored to prevent release into local waterways
- b. confirmation that sludge will be collected and disposed of off-site by a suitably licensed contractor.

#### Item 6 Response:

The sediment control measures within Section 3.2 of the Stormwater Management Plan have been prepared to include the sediment basin storage requirements for each stage, based on a rainfall depth (R) of 0.126m, from an adopted average intensity of 5.27mm/h. The following management strategies are to be used for the de-sludging sedimentation basins on the site:

- Sediment control devices must be de-silted and made fully operational as soon as reasonable and practical after a sediment-producing event, whether natural or artificial, if the device's sediment retention capacity falls below 70% of its retention capacity.
- The primary method of de-silting the sediment control devices includes the emptying of all contained water from the device, leaving it to be dried and turned into a hardened clay resource. This resource is then collected and repurposed for other uses, including but not limited to the following:
  - an additive to be blended into final material products,
  - used to make bunds on the site, and
  - for site rehabilitation purposes as a fill/growth material.

The sludge is not required to be collected and disposed of off-site by a suitably licensed contractor, as the sludge is not a contaminated material.

## **On-Site Sewage Management**

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### **Information Request Item 7 Wastewater Treatment**

#### Information Requested:

7) **The proponent is requested to provide:**

- a. certification from a licensed plumber of the age of the sewage treatment and disposal facilities on-site, and that the facilities are in good working order, regularly serviced and are of adequate capacity and size to service the 15 staff employed at the site
- b. the location of both the wastewater treatment plant and effluent disposal area on a plan



- c. *if effluent disposal is via sub-surface irrigation or trenches, confirm that the disposal area is protected from vehicles utilising the area (i.e. provision of fencing or other access restriction).*

Item 7 Response:

No objection is had to a condition being imposed on any SDA Approval which requires certification of this wastewater system as follows:

- Engage a suitably qualified wastewater consultant to prepare and submit a certification statement confirming:
  - that the existing Bio-cycle wastewater treatment systems and associated effluent disposal facilities (sprinklers/sub-surface irrigation lines, soil integrity etc.) are operating efficiently and satisfactorily;
  - that the existing Bio-cycle wastewater treatment systems and associated effluent disposal areas/facilities are of sufficient capacity to accommodate both existing and future staff/visitors associated with the expanded extraction activities; and
  - current and ongoing measures are in place to ensure that the effluent disposal fields for both systems are adequately protected from extractive activities, vehicular movement paths, stockpiling and any other activities on site, to prevent damage to equipment.

The wastewater system certification can be provided to the Coordinator-Generals Office prior to the commencement under the new SDA Approval.

## **2 Referral Entity Items – Scenic Rim Regional Council**

### **Site Plans**

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#### **Information Request Item 8 Operations Area**

Information Requested:

*Clarification is required on whether the hatched Operations Area on the site plan is intended to be an overburden storage area.*

- 8) **The proponent is requested to provide:**
- a. *clarification if the hatched Operations Areas is intended to be an overburden storage area*
  - b. *if the hatched Operations Area is intended to be an overburden storage area provide details on:*
    - i. *how will the risks of land slips be managed*
    - ii. *if there are any other areas on the site intended for storage or overburden which need to be considered for potential land slip issues?*

Item 8 Response:

The hatched Operations Area as identified in Drawing No. 740.DRG.459R1 – Site Layout Plan is to utilised for temporary plant/equipment storage and as an access to the adjacent sediment basin.

No other areas on the site will be used for the storage of overburden material, other than within the East Pit and West Pit.

**Information Request Item 9 Buffer Distance**

Information Requested:

On the northeast corner of the site plan, two measurements are shown, 10m and 30m which appear to indicate a buffer distance. In addition, there appears to be a reduction of buffer distance on the east/west boundary to ten metres.

9) **The proponent is requested to:**

- a. provide detail on the purpose of the two figures of 10m and 30m shown on the site plan and what they represent
- b. identify if there is an intention to secure approval for a reduced buffer and if so, provide evidence to support the landform stability with such a reduced buffer.

Item 8 Response:

In reference to the two (2) setback measurements shown in the north-eastern boundary of Drawing No. 740.DRG.459R1 – Site Layout Plan (refer **Figure 3**), the 10m measurement indicates the proposed setback of the vegetation buffer, represented as the hatched green line within the legend. The 30m measurement indicates the proposed setback to the proposed operations area, represented as the black hatched area with the legend.



Figure 3 – Site Layout Plan Setback Measurements

Reference is made to Drawing No. 740.DRG.458R1 – Approved vs Proposed Extraction Boundary, which details the approved and proposed setbacks. As shown on this plan, the proposed setbacks remain generally unchanged, with the exception of the East Pits separation to the northern boundary.

The operation will continue to be undertaken in accordance with the conditions of the EA and the requirements under the *Mining and Quarrying Safety and Health Act 1999*.

## **Environmental Management Plan**

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### **Information Request Item 10 Stockpile Areas**

#### Information Requested:

Section 4.2 Topsoil and Subsoil Management Plan states:

*The following measures should be implemented for topsoil stripping:*

- *Materials should not be stripped when too wet or too dry*
- *When stripped, materials should be used directly for rehabilitation to the maximum practicable extent or stockpiled and preserved for future use*
- *Stockpiling of materials should not exceed a height of 2 to 3 m and should be shaped and revegetated to protect the soil from erosion and weed infestation*
- *Stockpiles should be maintained in a free draining condition and long-term soil saturation should be avoided*
- *Runoff waters external to the areas to be stripped should be diverted away from the working area*
- *Stripping of topsoil should be limited to the minimum area necessary."*

*However, no stockpile areas appear to be identified on the site plan. In addition, the statement 'Stockpiling of materials should not exceed a height of 2-3m' requires strengthening.*

**10) The proponent is requested to:**

- a. *provide an updated site plan identifying the location of stockpile areas.*
- b. *amend "Stockpiling of materials should not exceed..." to "Stockpiling of materials must not exceed..."*

#### Item 10 Response:

In response to the information requested in Item 10 above, the submitted Drawing No. 740.DRG.459R1 – Site Layout Plan has been amended, updating the identification of the central area from the current "Operations Area" to "Stockpile and Processing Area" (refer **Attachment 6 – Amended Site Layout Plan**).

The prescribed Topsoil and Subsoil Management measures include in Section 4.7 of the EMP has also been amended from "Stockpiling of materials should not exceed..." to "Stockpiling of materials must not exceed..." as requested to strengthen this stockpiling management measure (refer **Attachment 2 – Environmental Management Plan**).

### **Information Request Item 11 Rehabilitation Management Plan**

#### Information Requested:

Section 4.7 – Rehabilitation Management Plan

**11) The proponent is requested to amend:**

- a. *point 6 from "Spreading is to be immediately followed by revegetation wherever possible" to "Spreading is to be immediately followed by revegetation unless inclement weather prevents and in any case within a reasonable time frame" or words to this effect.*

#### Item 11 Response:

In response to the information requested in Item 11 above, the prescribed Topsoil and Subsoil Management measures included in Section 4.6 of the EMP has also been amended from "*Spreading is to be immediately followed by revegetation wherever possible*" to "*Spreading is to be immediately followed by revegetation unless inclement weather prevents and in any case within a reasonable time frame*" (refer **Attachment 2 – Environmental Management Plan**).

We confirm that pursuant to Schedule 2, Part 2, Section 2.2 (4)(b) of the Development Scheme, this letter and the attachments provided comprise a full response to the items as outlined in the Referral Entity Information Request Letter issued by the Office of CG. It is therefore requested that the Office of CG provide referral entities with the proponent's response and request that the referral entities proceed with the assessment of the application and the additional information.

Should you have any queries regarding any of the information provided, please contact myself or Jack Wallace by telephone: 1800 497 587, or via email: [mbenham@groundwork.com.au](mailto:mbenham@groundwork.com.au).

Yours faithfully

**Groundwork Plus Pty Ltd**



**Megan Benham**  
**Project Director**

*Attachments:*

- Attachment 1 – Stormwater Management Plan
- Attachment 2 – Erosion and Sediment Control Plan
- Attachment 3 – Environmental Management Plan
- Attachment 4 – Generally Agreed Backfill Design
- Attachment 5 – Hazardous Materials Storage Structures
- Attachment 6 – Amended Site Layout Plan