

09 April 2026

██████████
Director, New Communities
VPA
Via email: ██████████

Merrimu PSP community engagement and exhibition – ██████ submission

Dear ██████

██████████ is the owner and operator of the ██████████ Quarry located at ██████████ (the Quarry) that operates as an extractive industry pursuant to the following work authorities and planning permits:

- ██████████
- ██████████

██████ has been in discussions with Colliers representing ██████████ for more than three years about the potential reduction of the 500m quarry buffer that exists from the WA boundary of the collective quarry operations on the western side of Gisborne Road. Assessments prepared by ██████████ have been circulated and discussed with ██████ and we have raised concerns with the approach in these reports, especially technical reports that required upgrades to be made to the Quarries to address conflicts between the Quarries and the proposed sensitive receptors in the Merrimu PSP.

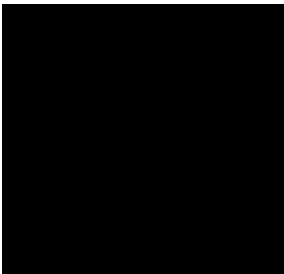
The Quarry

The Quarry has been operating since the early 1970s and is the primary source of fine aggregates for concrete, masonry and packing sand for the Melbourne region. The Quarry is identified in [Clause 02.03-7](#) the Moorabool Shire Planning Scheme as being a state-significant natural resources that makes significant employment and economic contributions to Bacchus Marsh.

The Quarry is currently being worked in multiple areas to source feed, with the land adjacent to the Merrimu PSP still active for both extraction and rehabilitation purposes (which includes blasting).

Overarching concerns

The current drafting of the PSP appears to commit to rezoning land to “residential” (applied General Residential Zone) that will be located within the “quarry buffer (500m)” as per Plan 2 and Plan 7. We note that there have been no detailed technical assessments carried out (such as noise, air quality and blasting) that demonstrates that sensitive receptors are acceptable within these quarry buffer areas and wouldn’t cause a state of non-compliance to occur at the ██████████ and ██████ quarries (the Quarries).



The absence of a technical assessments that has been peer reviewed by the relevant regulatory authorities (such as the EPA and Resource Victoria) creates a situation that allows for sensitive uses to be introduced to these quarry buffer areas that may cause a conflict of use.

█████ approach to any sensitive receptors to be introduced into these quarry buffer areas is that they must be subject to the same approach and assessments that █████ (or the other quarry operators) are required to carry out to expand our operations through a work plan variation (WPV) process which includes:

- Preparation of technical assessments to address conflicts between the quarry and sensitive receptors.
- Review and approval of the application by Resource Victoria (RV)¹.
- Technical assessments reviewed by referral authorities, including the EPA for noise and dust.

We note that the above approach is consistent with the various EPA guidance material (e.g. Publication 1949 and Supporting information for separation distance guideline and landfill buffer guideline).

Put simply, █████ submission is that the same tests and process that apply to █████ to expand a quarry via a WPV apply to the Developer to introduce sensitive receptors into the quarry buffer area. This is a logical approach given the conflict is identical (i.e. Quarry impacts on sensitive uses) no matter whether the quarry or the sensitive receptor is the agent of change.

Types of assessments required

█████ expects the following impacts would arise due to introduction of sensitive receptors within the quarry buffer area:

- Blasting.
- Air quality.
- Noise.

These technical assessments are all required for a WPV application and are reviewed by RV and EPA during the statutory endorsement of the work plan to ensure that all conflicts between the quarry and sensitive receptors are in accordance with the relevant guidelines.

What are sensitive uses and development?

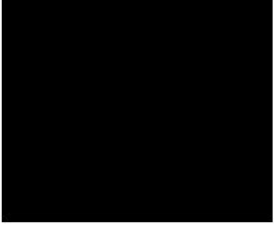
There are two types of sensitive uses to understand:

- Sensitive uses in relation to air quality and noise.
- Sensitive uses in relation to blasting.

The sensitive uses in relation to air quality and noise are set by the EPA guidance material. These uses all need to be included in the UGZ requiring assessment if located within the quarry buffer area.

The sensitive uses in relation to blasting are nominated in the Australian Standard, Explosives—Storage and use Part 2: Use of explosives. As blasting is an activity that can cause impact beyond the boundary of the Quarry, it is important to note that it applies to both uses and development (e.g. pipelines,

¹ Resource Victoria is referred to in the Victorian Planning Scheme as the "Secretary to the Department administering the *Mineral Resources (Sustainable Development) Act 1990*".



powerlines and cables). The physical structures need to be either designed or located to ensure that they can withstand the ground vibration caused by blasting undertaken at the Quarry.

Comment on Urban Growth Zone (UGZ)

■ notes the following in relation to the current drafting of the UGZ:

- The UGZ in its current drafting allows for sensitive receptors within the quarry buffer areas as 'Section 2 – Permit required'. There is no condition attached to Section 2 uses.

■ notes the following issues with the current drafting of the UGZ on the basis of it's overarching concerns listed earlier in this submission:

- There are no Section 2 uses listed within the UGZ. As such, all sensitive uses (such as Dwellings) are Section 2 without a condition. This allows the decision maker (i.e. the Council) to allow dwellings that could cause a state of non-compliance to the Quarry as these are not prohibited within the quarry buffer areas.
- The current Application requirements, Decision guidelines, etc. only require dust and air pollution to be considered. As outlined earlier in this submission, noise and blasting are also relevant impacts from the Quarries on sensitive receptors and need to be considered via technical assessments.
- There are no referral requirements to EPA or RV that allow for the assessment of whether any technical assessments would cause the quarries to enter a state of non-compliance. The absence of any peer review of technical assessments by the appropriate subject matter experts is deeply concerning and is not consistent with the WPV process.
- There are no public notice requirements which means that ■ cannot verify that consultant reports addressing risks (such as noise, dust and blasting) appropriately reflect the intensity of the activities that occur at the Quarry. If the Developer uses incorrect assumptions to prepare these reports this could bring the Quarry into a state of non-compliance.

Suggested rectifications:

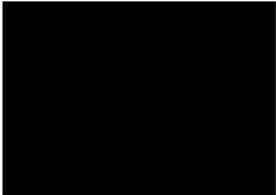
- Technical assessments must be prepared before sensitive receptors can be introduced in the quarry buffer areas.
- Technical assessments must be referred to and reviewed by the relevant regulation bodies being the EPA and RV.

Other approaches that are less desirable to ■

- If referrals to both EPA and RV are not included, public notice is required to quarry operators to ensure that uses will not conflict with the quarry operations based on the technical reports prepared by the Developer.
- ■ does not prefer this approach as it would introduce administrative burden on all parties and may result in multiple objections and appeals with different developers when the land is subdivided and developed in the future.
- ■ preference is that the EPA and RV review and approve of the technical assessments to allow sensitive uses within the quarry buffer.

Comment on plans

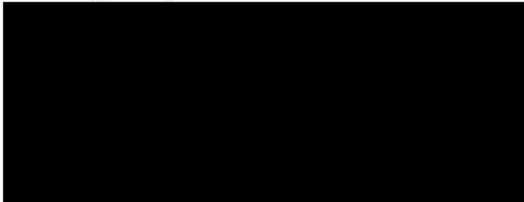




The plans (e.g. Plan 2 and Plan 7) incorrectly label the [redacted] and [redacted] Quarries. These labels need to be switched to represent the operations.

Should you require further information or clarification please contact me on the details below.

Regards,



Planning & Development Manager

