

2 September 2020

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Dear Ms Wong,

**LAUNCESTON INTERIM PLANNING SCHEME 2015 – DRAFT AMENDMENT
58 / PERMIT DA0472/2019 – 40520 TASMAN HIGHWAY, ST LEONARDS**

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I refer to the Department of State Growth submission dated 20 August 2020. The submission notes the presence of Exploration Licence EL 18/2014 and recently identified mineral resources in proximity of the subject site at 40520 Tasman Highway, and the potential for future resource development activities (i.e. mining) which may lead to future land use conflict with sensitive uses extending into this area.

1. Further Submission

On behalf of the applicant, JCBGP Pty Ltd, the presence of EL 18/2014 and recently identified mineral resources (i.e. bauxite) to the south of the subject site is acknowledged. It is submitted, however, that the potential for land use conflict associated with any future mining of this resource already exists and is capable of being adequately managed. The location of the resource within the exploration licence indicates that adequate separation is capable of being provided to existing sensitive uses as well as the subject site (see Attachment 1). The draft amendment and subdivision proposal therefore will not create the potential for land use conflict with any future mining activities.

2. Supporting Information

The following information has been compiled from publicly available sources in support of this submission.

- EL 18/2014 was granted on 2 December 2014 for a period of 5 years to ABx4 Pty Ltd, a wholly-owned subsidiary of Australian Bauxite Limited (“ABx”). It originally encompassed a 135km² tenement area extending from St Leonards to the north of Launceston around Dilston and Turners Marsh. Its boundary follows MGA grid boundaries which have 1km intervals. Therefore, even if the identified potential resource relates to a small part of a 1km² grid, the entire grid was included within the tenement.
- ABx4 Pty Ltd has obtained four other exploration licences in Tasmania relevant to other previously identified bauxite resources at Campbell Town, Fingal Rail, Nile Road and Westbury-Delorraine (known as DL-130). ABx, through other subsidiaries, is the owner of a mining lease within a portion of the exploration licence to the north-west of Campbell Town from which it is currently producing bauxite at a mine known as Bald Hill.

The mining operations at Bald Hill commenced on 9 December 2014. ABx has reported in an ASX Announcement dated 28 May 2015¹ that its business plan is to produce bauxite from three production centres in Tasmania. Bald Hill is the first production centre whilst DL-130 was identified as a second production centre. ABx has undertaken investigations to identify the third production centre.

- Sixty-eight (68) drill holes were made in the eastern portion of EL 18/2014 during March-April 2015. The area that was investigated is known as Portside. The bauxite layer was identified beneath an overlying layer of unconsolidated sediments ranging up to 12m in depth in places. The bauxite formation is a flat-lying layer ranging in thickness from 2m to 4m. Bauxite was encountered in 31 drill holes. No bauxite was encountered in 37 drill holes. The location of the drill holes is shown in Figure 2 of the ASX Announcement of 28 May 2015². 9 representative samples of bauxite were collected for preliminary analysis. This identified that 7 of the samples could be sold as mined with minimum processing. At that time, the ABx document identified that Portside could become the third production centre.
- A 20km² portion of EL 18/2014, in the St Leonards area, was relinquished in December 2015. This followed testing within the Dunedin and Hunting Grounds properties to the east of the current tenement boundaries. The 1st Partial Relinquishment Report³ identified that thirteen drill samples were collected within these properties including 10 within Dunedin and 3 within Hunting Grounds. The sample locations are shown in Map 2 of the report. Only one sample within Dunedin was found to be of bauxite grade. Further, the observed bauxite layer was thin and flanked by dolerite outcrops on all sides, which indicates that there is unlikely to be an extension of good-quality bauxite. No bauxite was observed within Hunting Grounds.
- An ASX Announcement by ABx dated 25 August 2016⁴ reported that drill sampling at Fingal Rail indicated a five-fold increase in the cement-grade bauxite resources at this location compared with original estimates. It was therefore identified as the mostly likely second mine for ABx in Tasmania and would be operated as part of the Campbell Town production centre.
- A 58km² portion of EL 18/2014, in relatively elevated areas in the eastern part of the tenement, was relinquished in November 2017. The 2nd Partial Relinquishment Report⁵ indicated that all bauxite observations to date, including all historical reports, have been along the foothills of the tenement, including at St Leonards and Dilston. Therefore, it was considered less likely that bauxite occurs on the more highly-elevated parts of the ridgeline.

¹ ABx, "Bauxite Discovery at New Portside Production Centre", <https://www.asx.com.au/asxpdf/20150528/pdf/42yvlnkhwsc65.pdf>.

² Ibid.

³ ABx4 Pty Ltd, "1st Partial Relinquishment Report for EL 18/2014 – Prossers Road", http://www.mrt.tas.gov.au/mrt/doc/tasexplor/download/16_7546/EL182014_201512_PR_01_Report.pdf.

⁴ ABx, "Significant Resource Increase at Fingal Rail Bauxite Project to 6 million tonnes", <https://www.asx.com.au/asxpdf/20160825/pdf/439mgs6xkxh5vj.pdf>.

⁵ ABx4 Pty Ltd, "2nd Partial Report for EL 18/2014 – Prossers Road", http://www.mrt.tas.gov.au/mrt/doc/tasexplor/download/17_7845/EL182014_201711_PR_01_Report.pdf.

- The ABx website (<http://www.australianbauxite.com.au/operations.htm>) therefore currently identifies three projects within Tasmania, including:
 - Bald Hill mine;
 - Fingal Rail, the second planned mine. According to the website the mining lease for the mine has already been outlined; and
 - DL-130, the third planned mine.
- The exploration licences relevant to Campbell Town (including Fingal Rail and Nile Road), DL-130 and Portside were identified as having a 2019 expiry date in the ABx Annual Report for 2018⁶. Due to consolidations and renewals, there are now three mining leases associated with these areas which have an expiry date in 2021 according to the relevant mining layers available on TheLIST database. The expiry date for EL 18/2014 is 1 December 2021.
- The available information therefore indicates that whilst there are bauxite resources at Portside, to the south of the subject site, they are not as significant as those at Campbell Town and Westbury-Deloraine.
- The Portside area, and the other land within EL 18/2014, is located in relatively close proximity to residential-zoned land. This is illustrated by Attachment 2 which comprises maps showing the proximity of ABx4 Pty Ltd exploration licenses to residential zones. Specifically:
 - The Nile Road and Final Rail areas are not located in proximity of a residential zone.
 - The portion of the Campbell Town exploration license EL 7/2010 which contains the Bald Hill mine is located a minimum of 1.2km from a residential zone within the town. The actual mining lease within the exploration licence is located a minimum of 2.2km from a residential zone.
 - Two portions of the DL-130 mining lease encroach onto residential-zoned land in the north-west of Deloraine and another area to the south-east of the town. The exploration license is otherwise comprised of multiple areas across a combined 52km² and is located a minimum of 450m from other residential zones.
 - EL 18/2014 encroaches onto existing residential-zoned land, within a Rural Living Zone, at Drivers Run, Abels Hill Road, Dilston and Swan Bay.
- The Development Proposal and Environmental Management Plan⁷ prepared for ABx for the Bald Hill Mine indicates at page 16 that the bauxite mining operations do not involve blasting and do involve infrequent crushing of oversize rock.

⁶ ABx, "Annual Report Calendar Year 2018 (released March 2019)", http://australianbauxite.com.au/site_folders/241/files/2018%20ABx%20Annual%20Report%20V%20final.pdf

⁷ ABx4 Pty Ltd, "Development Proposal and Environmental Management Plan, Bald Hill Bauxite Project", <https://epa.tas.gov.au/Documents/Australian%20Bauxite%20Limited,%20%20Bald%20Hill%20-%20DPEMP.pdf>.

Similarly, the Environmental Assessment Report⁸ prepared the Environment Protection Authority (“EPA”) in November 2014 identifies, at page 3, that the mining operations do not require blasting and crushing of rock may be required occasionally.

The Environmental Impacts and Attenuation Code in the *Launceston Interim Planning Scheme 2013* (“Scheme”) specifies a 750m attenuation distance, from sensitive uses, for a quarry/pit involving crushing of rock in order to mitigate potential noise and dust impacts. This distance is capable of being reduced subject to the preparation of an environmental impact assessment in accordance with the requirements in Clause E11.6.1 P2 of the Scheme.

Whilst the Code does not apply to Level 2 Activities requiring assessment under the *Environmental Management and Pollution Control Act 1994*, the Board of the EPA would typically require consideration of potential noise and dust impacts as part of its assessment having regard to the distance to sensitive receptors. The Quarry Code of Practice⁹ produced by the EPA (May 2017) identifies at page 10 that a 750m separation distance should be maintained between quarry operations, involving crushing of material, and any sensitive use.

A map has therefore been produced, and is included in Attachment 1, to show a 750m distance around the outer edge of the bauxite layer indicated in Figure 2 of the ASX Announcement by ABx dated 28 May 2015. This distance extends to the Tasman Highway to the south of the subject site at 40520 Tasman Highway, and to the rear of the rural living properties which front onto Abels Hill Road. It also extends within 200m of General Residential-zoned land at St Leonards to the west. The map indicates that potential mining operations associated with the Portside bauxite resource will need to have regard to the potential noise and dust impact on existing sensitive uses at St Leonards. However, the available 750m minimum attenuation distance indicates there would be adequate separation distance from existing sensitive uses, and the subject site, to enable this to occur.

Please do not hesitate to contact me should any clarification be required.

Yours faithfully

6ty° Pty Ltd



Ashley Brook

Planning Consultant

- Attachments:
1. Proximity of Identified Bauxite Resources at Portside to Residential Zones at St Leonards
 2. Proximity of ABx4 Pty Ltd Exploration Licences to Residential Zones at Relevant Locations in Tasmania

⁸ EPA, “Environmental Assessment Report, Bald Hill Bauxite Mine”, <https://epa.tas.gov.au/Documents/Australian%20Bauxite%20Ltd,%20Bald%20Hill%20-%20EAR.pdf>.

⁹ EPA, “Quarry Code of Practice, 3rd Edition”, <https://epa.tas.gov.au/Documents/Quarry%20Code%20of%20Practice%20May%202017%20-%20web.pdf>.

Attachment 1: Proximity of Identified Bauxite Resources at Portside to Residential Zones at St Leonards

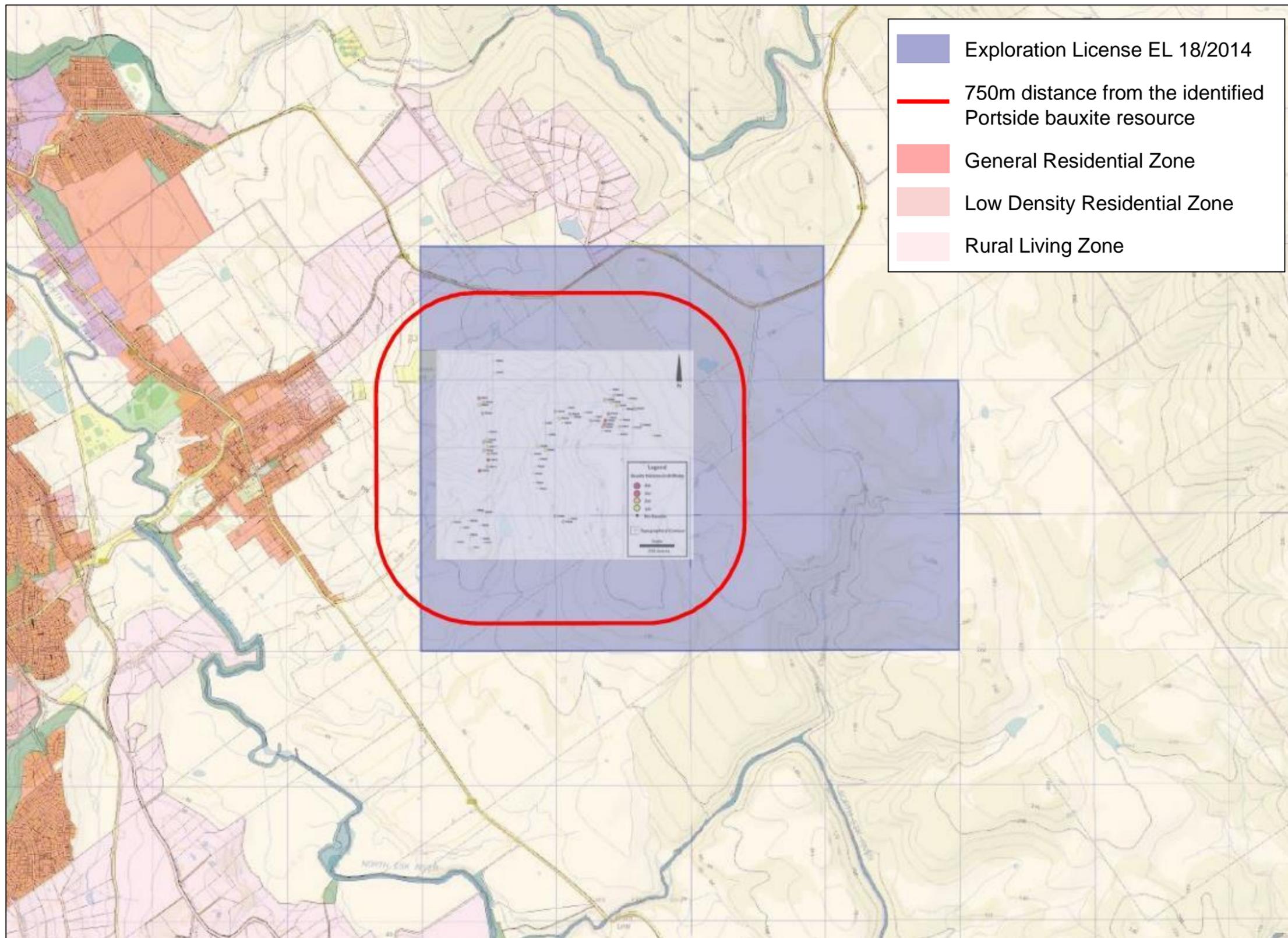


Figure 1: Portside Bauxite Resources and Residential Zones at St Leonards

Attachment 2: Proximity of ABx4 Pty Ltd Exploration Licences to Residential Zones at Relevant Locations in Tasmania

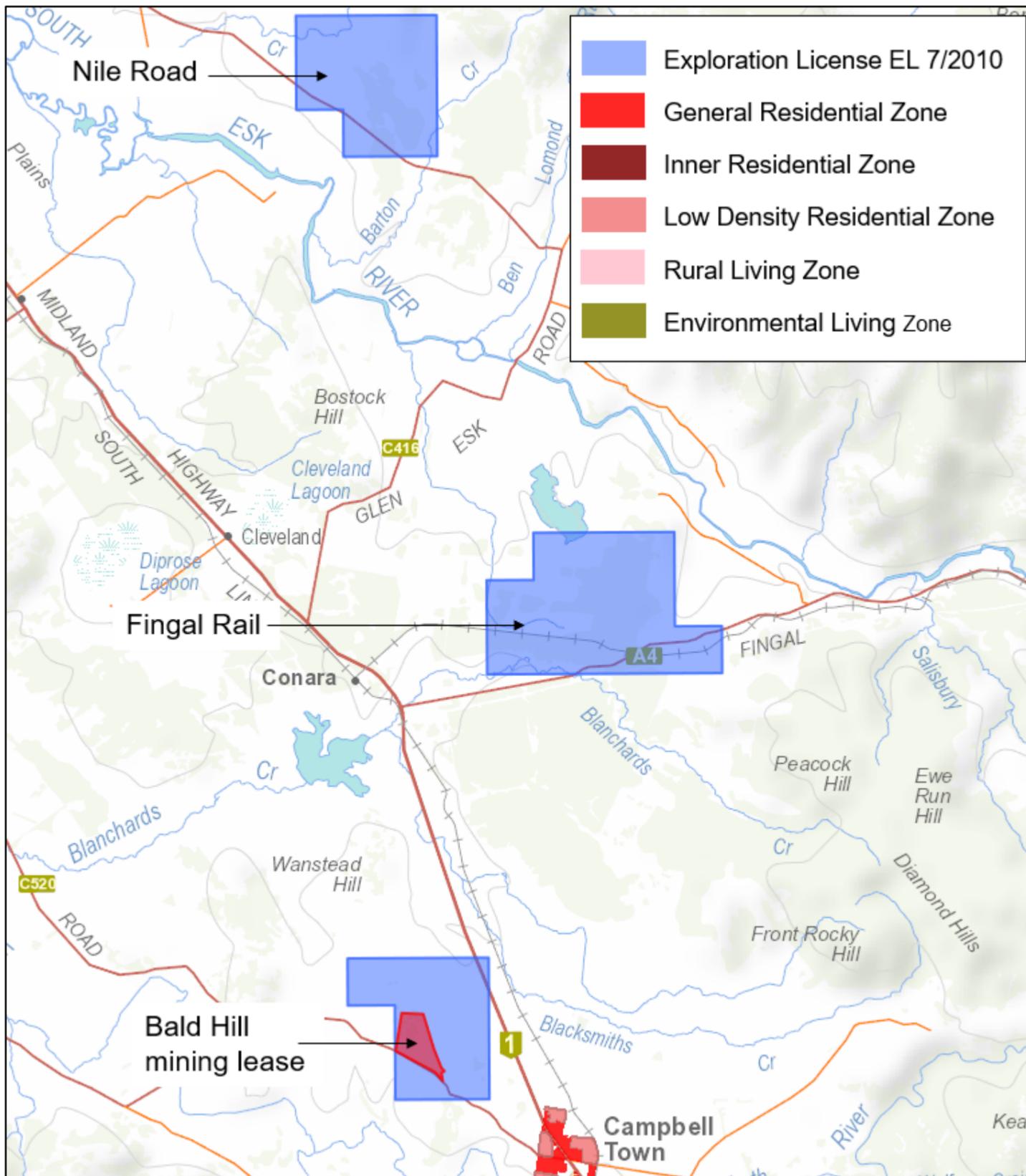


Figure 1: Campbell Town Exploration Licence EL 7/2010

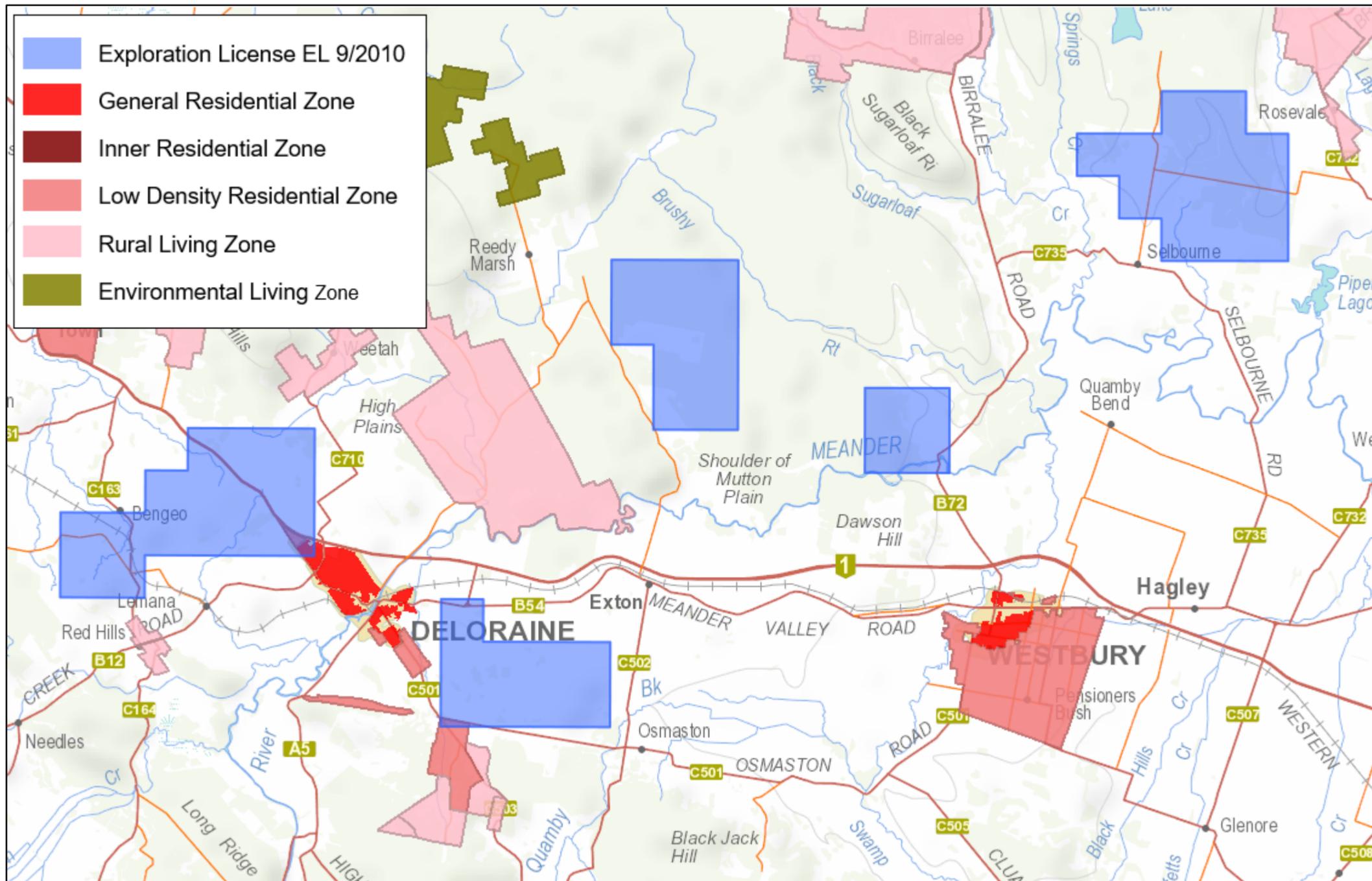


Figure 2: DL-130 Exploration Licence EL 9/2010

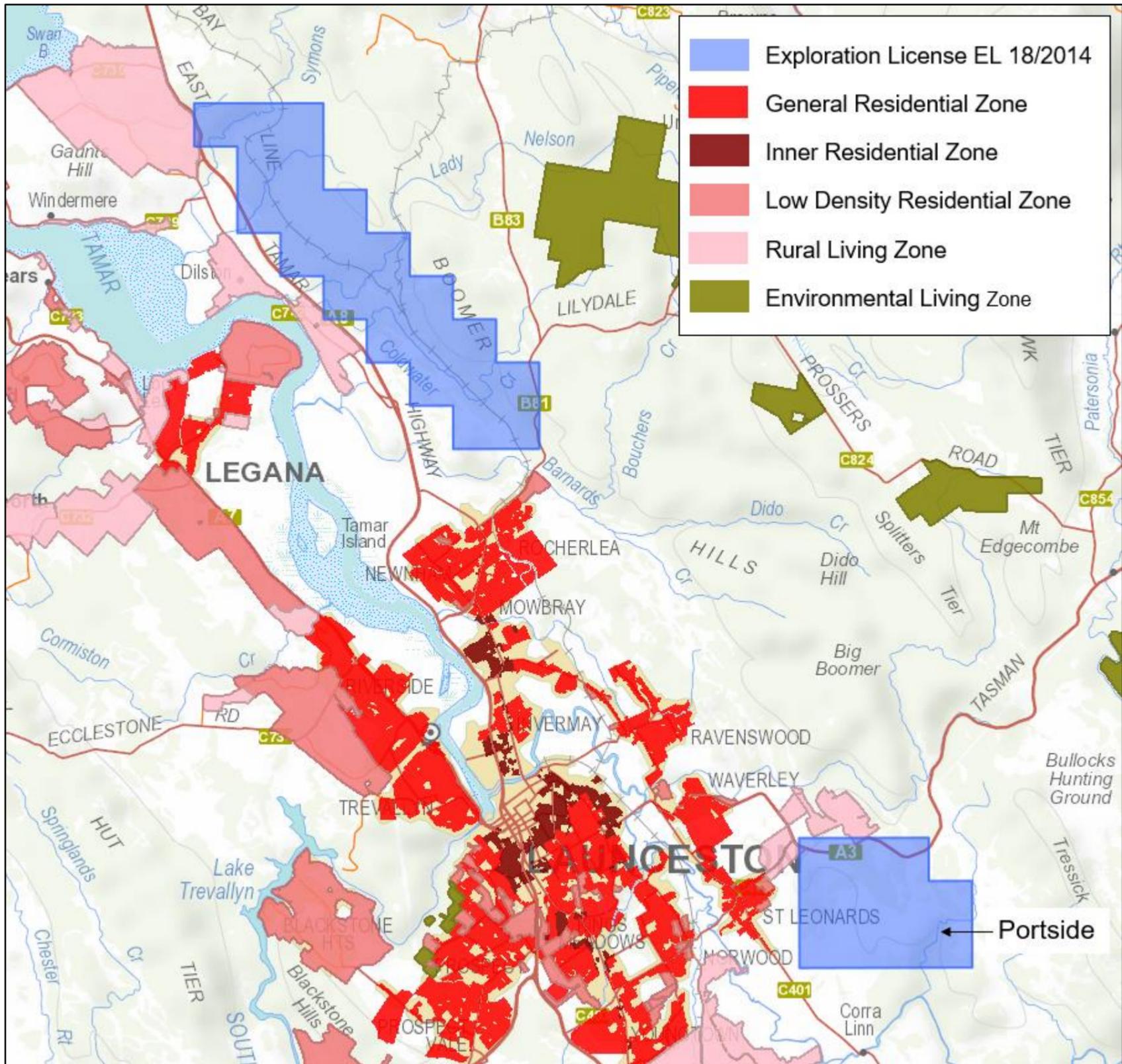


Figure 3: Prossers Road (including Portside) Exploration Licence EL 18/2014