

7th August 2021

For the attention:

Liam Jukes

Senior Planner – Major Assessment
City Development Branch
Council of City of Gold Coast

Dear **Liam Jukes**,

Objection submission COM/2019/81 -

Extractive Industry Development Code - 9.3.8, Transport Route (and others) not met
and lack of 'Extractive Industry Management Plan'

Please accept this objection as I believe it highlights that this development application is non-compliant with the Gold Coast City Plan with respect to the required Transport Routes and Access requirements: *'Extractive Industry Development Code - 9.3.8'*.

It has further, it would seem, failed to submit an *'Extractive Management Plan'* which, I believe, is also a clear requirement of City of Gold Coast City Plan: *'Extractive Industry Development Code - 9.3.8' ('Performance Outcome PO1'* which states: *"An extractive management plan should be submitted)*.

These believed non-compliance issues are highlighted below.

Failure to meet City Plan requirements for "100m transport route separation area"

In the City Plan: *'Extractive Industry Development Code 9.3.8', 'Part B - Assessable Development Benchmarks', 'Table 9.3.8-1: Extractive industry development code - for assessable development'* under *'Transport Route and Access - Performance Outcome PO7'* it states: *"Extractive Industry activities use only the designated transport routes as shown on the Extractive resources overlay map."* (Attachment A1).

The *"Extractive resources overlay map"* referred to is reproduced in Attachment A2 (I have endeavoured to obtain a close up of KRA 68 for clarity, reproduced in Attachment A3).

For additional clarity, this required *"100m transport route separation area"* can be more clearly seen in the City Plan Interactive Map, extractive Resources overlay (reproduced in Attachment A4).

Right from the very start, *'Stage 1'* onwards, it would seem the haulage route will compromise the City Plans: *"100m transport route separation area"*, as shown in Attachment A5, as it will be within 100 metres of public areas, but crucially not within the designated *"100m transport route separation area"* route, as is required (as shown in attachments A2, A3 and A4).

In fact, I believe, through every single stage of the one hundred year plus development the haulage route will compromise the City Plan's: *"100m transport route separation area"*.

It should be noted that from *'Stage 6'* onwards, when the processing area is moved to the north as proposed, it is believed all the quarry traffic will be using this haul route (including haulage trucks, concrete trucks, sand, cement deliveries, workers, visitors, customers, etc.) as shown in attachment A6. All these haulage vehicles, concrete trucks, etc. will be compromising the City Plans: *"100m transport route separation area"* (as shown in attachments A2, A3 and A4).

To be quite clear, from *'Stage 1'* onwards, haulage trucks, etc. will be encroaching beyond the approved *"100m transport route separation area"* (as shown in attachments A2, A3 and A4). The extent of the proposed encroachment, in the northwest of the site, can readily be identified in Attachment A7.

For complete clarity the proposed *'100m Transport route separation area'* where it is outside of the approved KRA 68 *'100m Transport route separation area'* and is encroaching on sensitive land uses is highlighted in attachment A8 (Yellow area).

This proposed encroachment beyond the approved *"100m transport route separation area"* will, I believe, affect the following sensitive areas:

- The *'Tamborine-Oxenford Road'* (adjacent to the proposed haul).
- The Coomera River (including the Public freshwater lake which is *'366 Tamborine Oxenford Road'* (Lot 51 on SP266761)
- The open space public area which is *'304 Tamborine Oxenford Road'* (Lot 61 on SP266760)
- The open space public area which is *'238 Tamborine Oxenford Road'* (Lot 61 on RP183197)
- The open space *'241 Tamborine Oxenford road'* (Lot 1 on RP138386)

All of these sensitive areas are outside of the designated *"100m transport route separation area"* (as per the City Plan resources overlay map and City Plan Interactive Map), however they are it would seem, within 100 metres of the proposed haul route for the next one hundred plus years (as shown in attachment A7). Therefore, these areas will be compromised by this proposed haul route being in an unapproved area outside the: *"100m transport route separation area"*. This is contra to the clear requirements regarding transport route separation areas despite there being no Acceptable Outcome permissible (Attachment A1).

Please note, this is also clearly contra to the City Plan requirement of 100 metre separation buffer as per the *"City Plan, Part 8 Overlays, 8.2.7. Extractive resources overlay code, Separation Area and 100m Transport route separation area, Performance Outcome PO2"* which states: *"(c) ensures an appropriately sized buffer between sensitive land uses, the resource/processing area and the transportation route of the KRA."* (Attachment A9).

Clearly these public areas are sensitive land uses as used by swimmers, fisherman, kayaks, etc. (in the case of the freshwater lake), families, picnickers, walkers, ramblers, etc. in the case of the open space areas and motorists, cyclists and pedestrians on the adjacent public road. All will be within 100 metres of the proposed *"haul route"* (Attachment A7) but not within the designated *"100m transport route separation area"* as per the City Plan Resources Overlay map (Attachment A2 and A3) and the City Plan Interactive Map (Attachment A4) as I believe is clearly required.

Development Application claims of compliance

In the development application main application on page 163, to the *“Extractive Industry Development Code 9.3.8.3”, “Transport routes and access” , “Performance Outcome PO7”: “Extractive Industry activities use only the designated transport routes as shown on the Extractive resources overlay map”* question: *“Does the proposal meet the acceptable outcome?”* the applicants response is: *“COMPLIES PER EXISTING”* (Attachment B1).

I believe this is obviously incorrect and highly misleading (as detailed above) and therefore this development application is non-compliant with this clear non-negotiable requirement that has no other acceptable outcome (‘AO7’ states: *‘No acceptable outcome provided’*, attachment B1).

Extractive Industry Development Code 9.3.8

It is noted in the *“Purpose”* section, section 9.3.8.2 it states:

“(1) The purpose of the development code is to manage the impacts of extractive industries on the environment and sensitive land uses surrounding the development” AND

“(2) The purpose of the code will be through the following overall outcomes:

- (a) Extractive Industry is separated from sensitive land uses and residential zones to ensure amenity impacts including visual, light, noise, dust, odour and vibration are at an acceptable level.*
- (b) The impact on traffic, transport on site operation noise on residential and other sensitive land uses is minimised.*
- (d) Extractive industry activities protect the visual character and amenity of the surrounding area, are located below the peak of a ridgeline and are visually screened to enhance the city image.”* (Attachment C1).

It is clear to me the permitting of the proposed haulage route to compromise the transport separation area will not: *“manage the impacts of extractive industries on the environment and sensitive land uses surrounding the development”* and thus, I believe, is not acceptable as clearly required by the City Plan.

Permitting the haulage route to breach the required designated transport route 100 m separation area, as proposed, will not ensure that: *“Extractive Industry is separated from sensitive land uses and residential zones to ensure amenity impacts including visual, light, noise, dust, odour and vibration are at an acceptable level”* and it will not ensure that *“The impact on traffic, transport on site operation noise on residential and other sensitive land uses is minimised”*.

Nor will it ensure that: *“Extractive industry activities protect the visual character and amenity of the surrounding area ... are visually screened to enhance the city image.”* as I believe the proposed haulage route will be visible from outside the Key Resource Area (as will the processing area and the truck parking area(s) it would seem).

Visual Amenity

It should also be remembered permitting this proposed haulage route to run parallel to the quarry boundary within 40 metres, or so, will, I believe, also compromise *'City Plan 9.3.8. Extractive Industry development Code, Performance Outcome PO1'* which states: *"Extractive industry activities are located, designed, operated and staged in a way that: (a) minimises environmental impacts on site and surrounding area; (b) prevents significant adverse amenity impacts on existing sensitive land uses or residential zoned land"* (Attachment D1).

And *'Performance Outcome PO3'* which states: *"Extractive Industry developments are screened or located in areas of least visual impact and minimise views of any significant infrastructure and visually obtrusive development from major roads"* (Attachment D1).

Also, *'Performance Outcome, PO4'* which states: *"Development protects the visual character and amenity of the area by ensuring ridgelines are retained as a natural feature and buffer"* and *"Acceptable Outcome, AO4"* states: *"Development is located at least 40m away from any ridgeline, as measured from the ridge peak"* (Attachment D1). However, I believe, the proposed haulage route will be located on (OR replacing OR extremely close) to the existing ridge peak that is running in parallel right along the Tamborine Oxenford Road. I believe this extractive industry will be highly visible from various points in the surrounding area.

Key Resource Area KRA 68

The Queensland State Key Resource Area Map for KRA 68 (from *'Key-resource-area-reports-and-maps-41-to-80'*) is reproduced in attachment E1. It can be clearly seen the *"Transport Route"* in this document aligns with the City Plan transport Route (as shown in attachment A2, A3 and A4). Thus, confirming, yet again, that the proposed development application proposed haul route (Attachment A7) does not conform to the requirements for the *"Transport Route"* either at a State or Local Council level.

State Planning Policy for Transport Route separation area

The *'State Planning Policy'* for *'Transport route separation area'* states: *"The area surrounding the transport route needed to maintain separation of people from undesirable levels of noise, dust and ground vibration produced as residual impacts from the transportation of extractive material. The distance is measured 100m from the centre line of the indicated transport route for a KRA"* (reproduced in attachment F1).

Clearly there is a requirement of 100m minimum separation for any part of the transport route to: *"maintain separation of people from undesirable levels of noise, dust and ground vibration produced as residual impacts from the transportation of extractive material."* and *"The distance is measured 100m for the centre line of the indicated transport route for a KRA"*. Clearly the proposed haulage route, as shown in attachment A6 and A7, is outside of the approved *'Transport route separation area'* and thus falls foul of these clear *'State Planning Policy'* requirements.

There is, I believe, no mitigating circumstances within the *'State Planning Policy'* to override these clear requirements.

Department of Infrastructure, Local Government and Planning

Similarly, in the *'Department of Infrastructure, Local Government and Planning', 'Part 3 - Mapping'* for *'KRA - Transport route separation area'* it states: *"KRA - Transport route separation areas show the area surrounding the transport route needed to maintain separation of people from undesirable levels of noise, dust and ground vibration produced as residual impacts from the transportation of extractive material"* (Attachment G1).

The proposed haul route, within 100 metres of sensitive land uses does not I believe meet these clear requirements.

Integrating state interest in a planning scheme (Guidance for local governments)

This is also emphasised in the *'Integrating state interest in a planning scheme (Guidance for local governments)'* where it states the *'Transport route of a KRA'* is *"the shortest practical route used to transport extractive resources to market. As the haulage of extractive resources may generate impacts (dust, noise, traffic congestion, road pavement impacts), the identification and protection of an unobstructed haulage route can help alleviate impacts"* and for the *'Transport route separation area of a KRA'* it states: *"The transport route separation area is measure 100 metres on either side from the centre line of the transport route"* (reproduced in attachment H1).

Clearly the proposed haulage route as shown in attachment A7, that is proposed to be within 100 metres of sensitive land uses but outside of the designated and approved *"Transport route separation area"* is not compliant with these clear state requirements.

Extractive Industry Management Plan

It is also noted that the City Plan: *'Extractive Industry Development Code 9.3.8', 'Part B - Assessable Development Benchmarks', 'Table 9.3.8-1: Extractive industry development code - for assessable development'* under *'Extractive industry management plan - Performance Outcome PO1'* it states: *"Extractive industry activities are located, designed, operated and staged in a way that:*

- (a) minimises environmental impacts on site and surrounding areas;*
- (b) prevents significant adverse amenity impacts on existing sensitive land uses or residential zoned land; and*
- (c) promotes the efficient extraction of the resource.*

Note - An extractive industry management plan should be submitted to demonstrate compliance with PO1 with no acceptable outcome provided (reproduced in Attachment D1).

I note no *'Extractive Industry management plan'*, as would seem is required, has been submitted as part of the development application. Instead, in the main development application the applicant has stated: *"COMPLIES. The intent of this development application is to enable the continual use of the site for current activities associated with extractive industries"* (Attachment D2).

This is clearly not the required *'Extractive Industry management plan'* that should encompass all the requirements of *'Performance Outcome PO1'*. In fact it is merely a statement that is saying the intent of the development application is enabling the continual use of the site for Extractive Industry! Clearly not addressing any of the requirements such as ensuring it:

- (a) *minimises environmental impacts on site and surrounding areas;*
- (b) *prevents significant adverse amenity impacts on existing sensitive land uses or residential zoned land; an*
- (c) *promotes the efficient extraction of resource.*

I believe, this development application has not satisfied the requirements of '*Performance Outcome PO1*' by its failure to submit the required: '*Extractive Industry management plan*' but instead it has merely stated: "*COMPLIES. The intent of this development application is to enable the continual use of the site for current activities associated with extractive industries*" (Attachment D2) which is clearly not what was and is required and is thus clearly inadequate.

Conclusion

This is I believe yet another failure by this development application to meet the clear City Plan requirements for '*Extractive Industry Development Code 9.3.8*'.

It also I believe compromises the State Key Resource Area (KRA) "*Transport Route*" requirements also.

I cannot believe, that a quarry operator, with so many years apparent experience, can it would seem, fail to understand the significance of the City Plan requirements for the '*Extractive Industry Development Code*' and seek to ignore all these key requirements that are implemented to maintain the health and safety of surrounding sensitive land uses and also to protect the quarry from urban encroachment. This objection highlights yet more examples of their clear non-compliance.

I have no doubt in my mind that this development application seeks to maximise the extractive footprint with little or no apparent considerations for the local environment or the local ecosystem or local residents and scant regard to the City Plan requirements also.

I hope the City of Gold Coast Council Planners will thoroughly consider what I believe to be a clear proposed breach in the City Plan's requirements in a number of key areas by this audacious development application.

Thank you in anticipation,

Kind regards

Tony Potter

* Disclaimer. Please note my findings are believed correct and are to the best of my ability. However, there may be errors and assumptions I have made that are incorrect. I do not believe this to be the case, but, realise with the vast amount of submitted data from the applicant, errors and assumptions on my part may occur. Hopefully this is not the case, but please accept my apologies if this is so. Thank you.

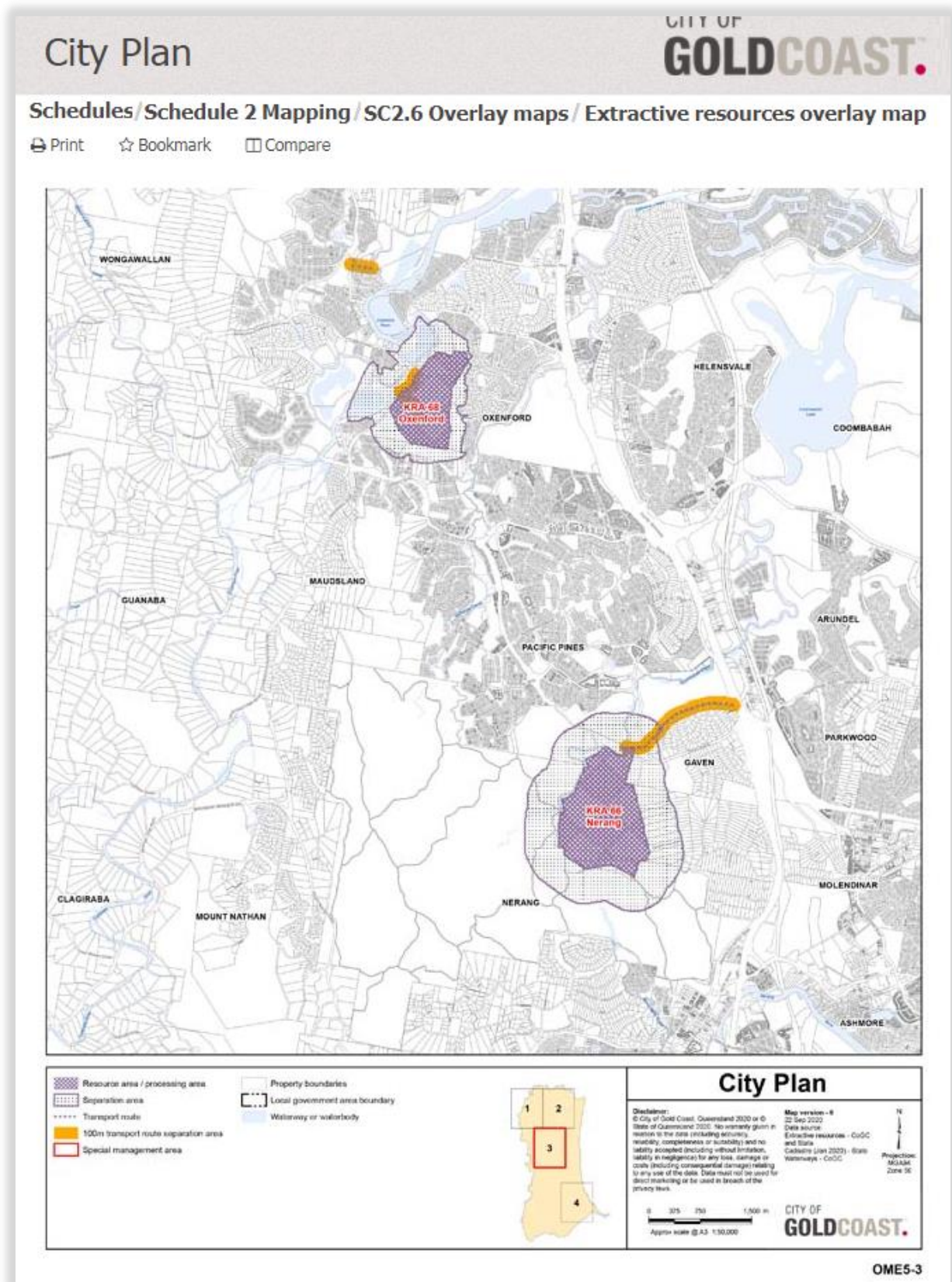
City Plan

City Plan / Part 9 Development codes / 9.3 Use codes / 9.3.8 Extractive industry development code

PART B – ASSESSABLE DEVELOPMENT BENCHMARKS

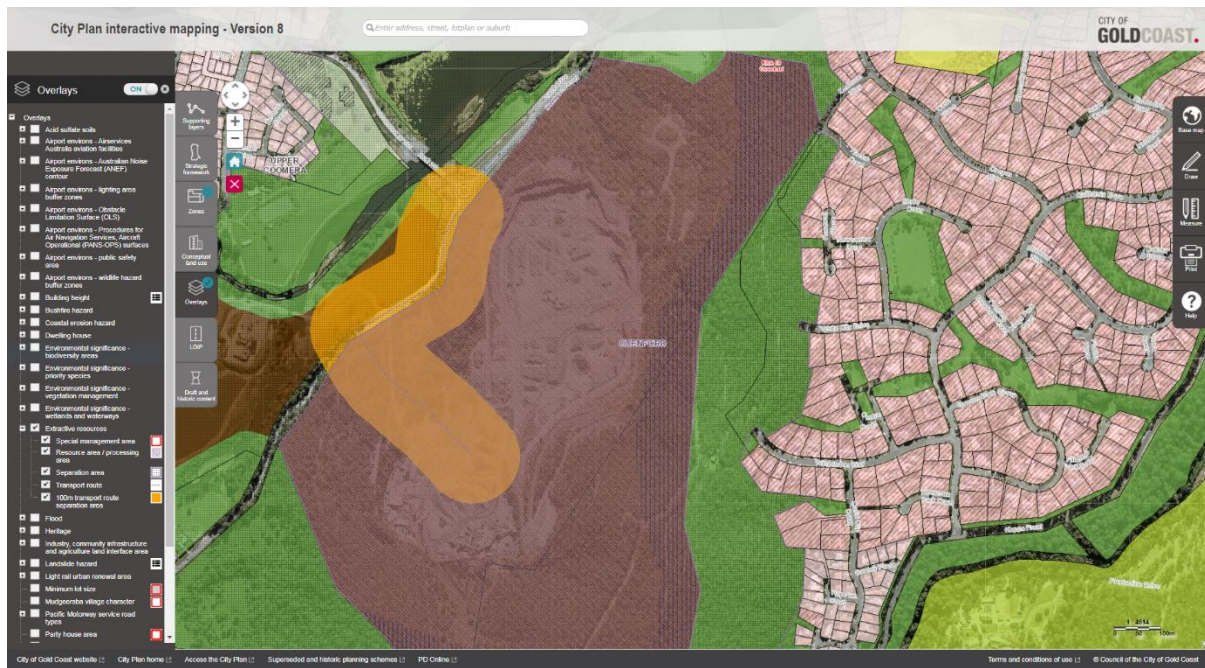
Table 9.3.8-1: Extractive industry development code – for assessable development

Performance outcomes	Acceptable outcomes
Transport routes and access	
P07 Extractive industry activities use only the designated transport routes as shown on the Extractive resources overlay map.	A07 No acceptable outcome provided.

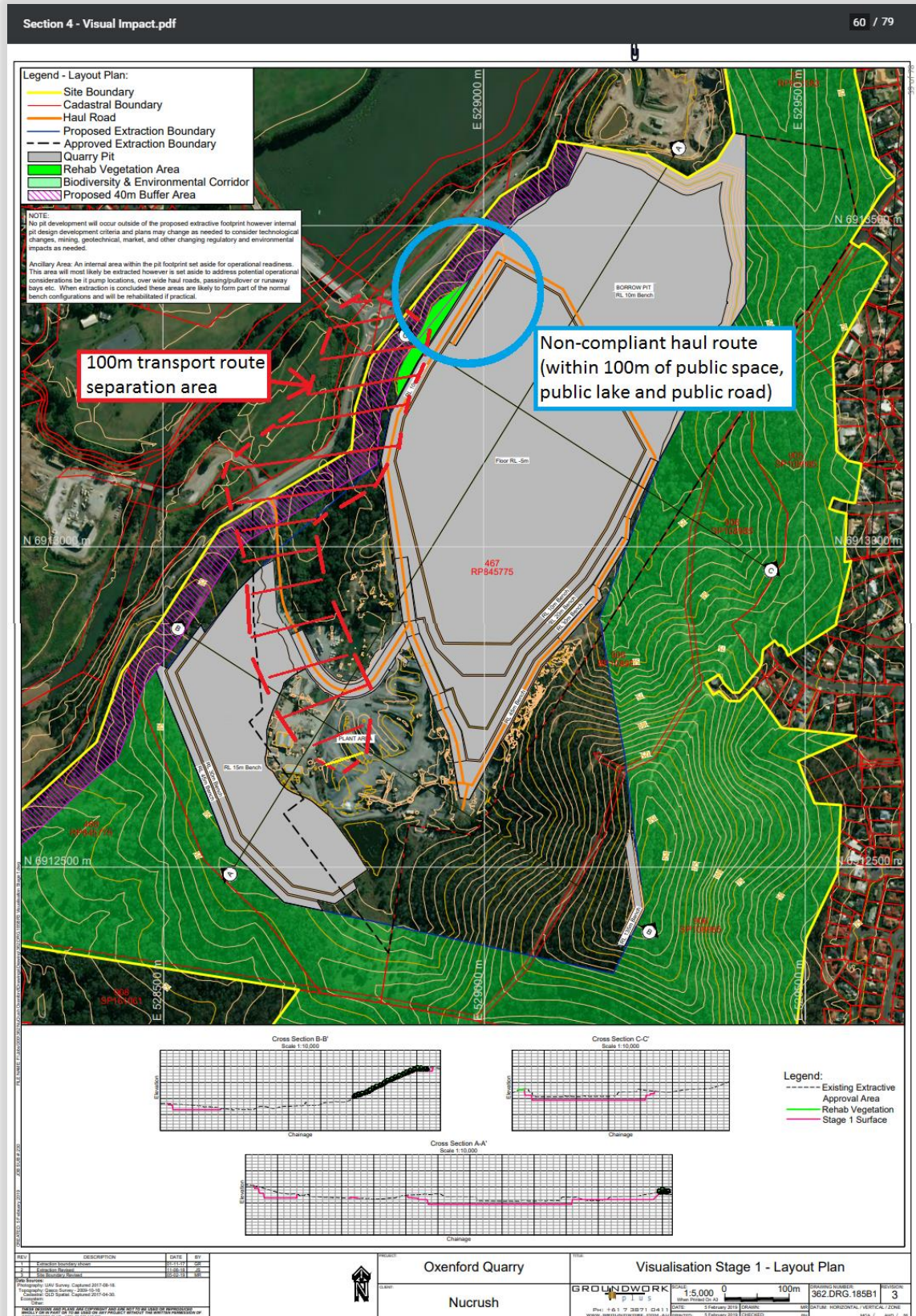


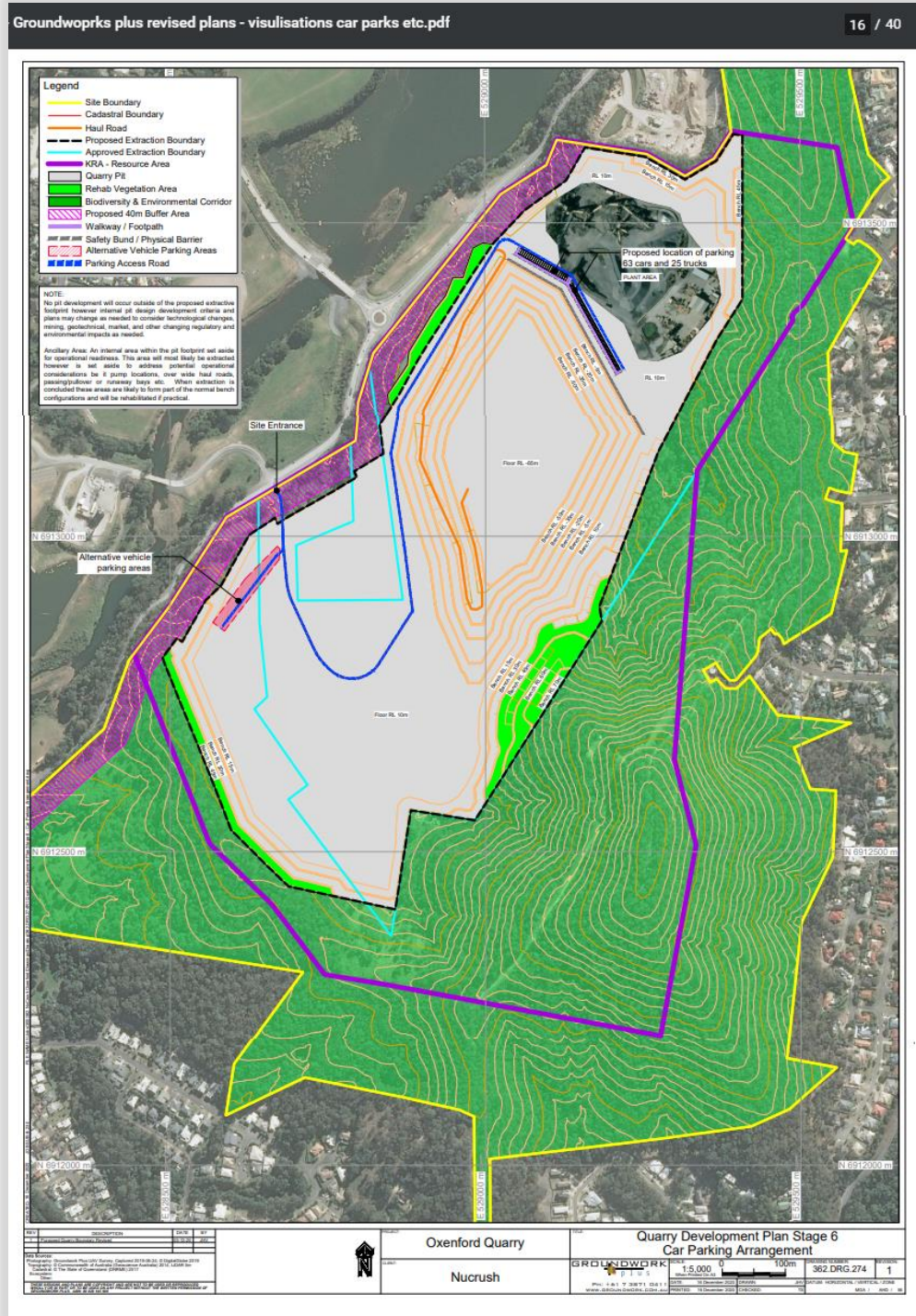


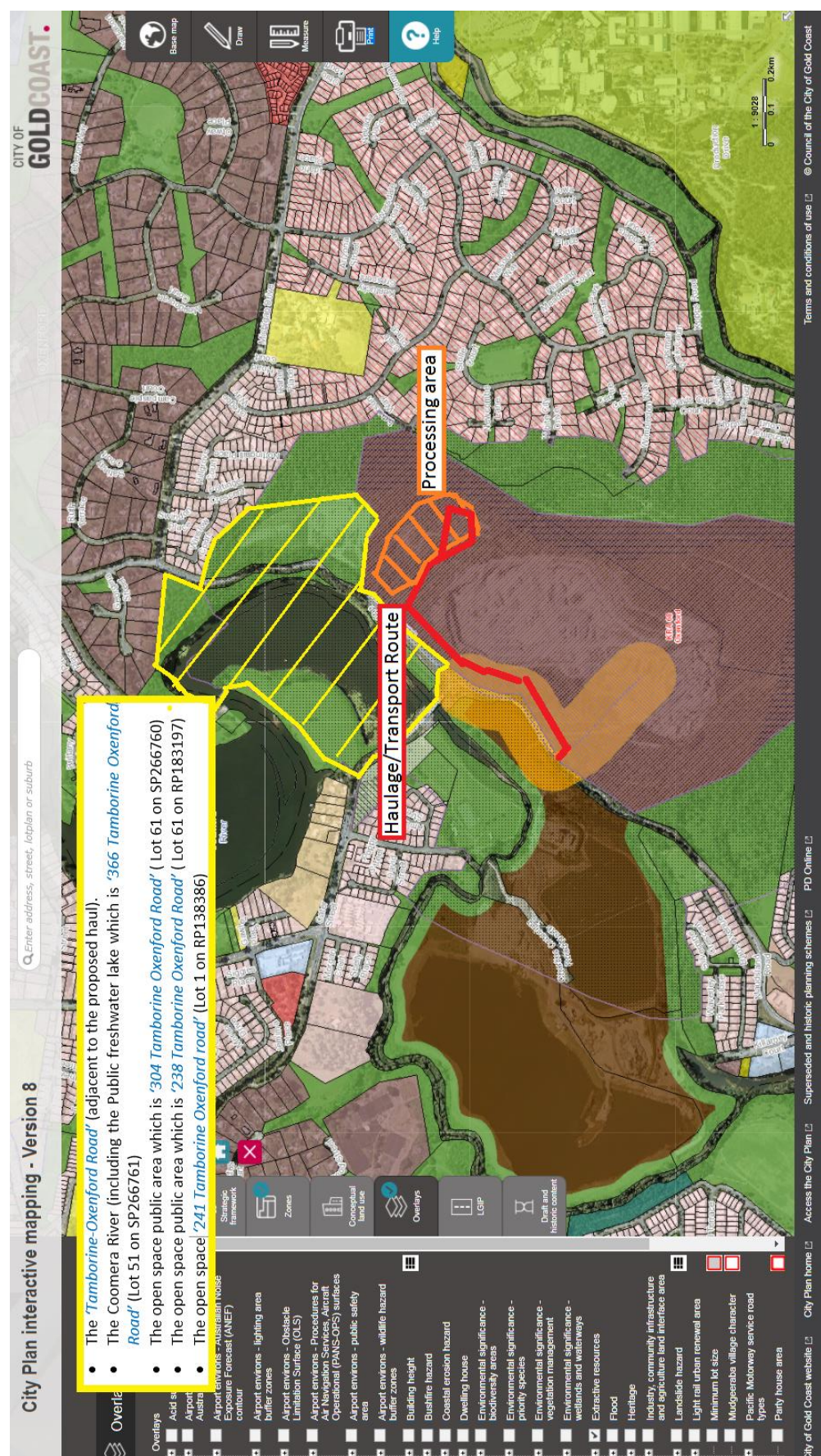
Attachment A4 - City Pan Interactive Map - Extractive Industry - "*100m transport route separation area*"



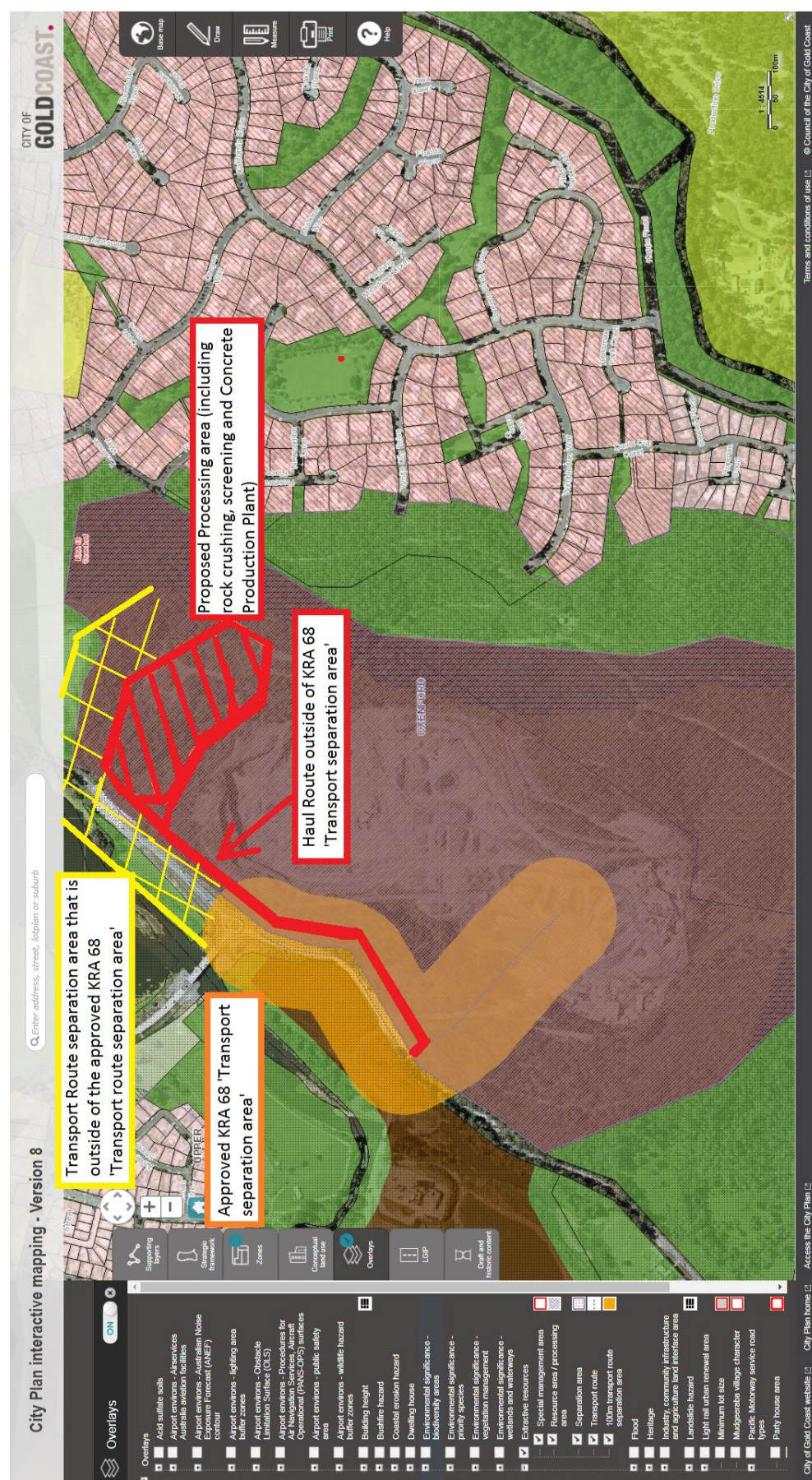
Attachment A5 - Stage 1







Attachment A8 - 'Sensitive area[s]' with respect to Haulage Route required 100m separation area



Attachment A9 - Applicants claimed compliance

City Plan

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City Plan / Part 8 Overlays / 8.2 Overlay codes / 8.2.7 Extractive resources overlay code

8.2.7 Extractive resources overlay code

Table 8.2.7-1: Extractive resources overlay code – for assessable development

Performance outcomes	Acceptable outcomes
Resource Area/Processing Area	
<p>P01</p> <p>Development where located within the Resource Area/Processing Area does not:</p> <ul style="list-style-type: none"> (a) compromise the ability to extract the natural resource in a safe, efficient and sustainable manner; and (b) does not introduce or increase uses that are sensitive to the impacts of Extractive industry. 	<p>A01</p> <p>No acceptable outcome provided.</p>
Separation Area and 100m Transport route separation Area	
<p>P02</p> <p>Development where located within the Separation Area and 100m Transport Route Separation Area:</p> <ul style="list-style-type: none"> (a) does not compromise the current and/or future extraction, processing and transportation of resources; (b) is orientated away from a Resource Area/Processing Area to minimise views/limit visual impact of Extractive industry; and (c) ensures an appropriately sized buffer between sensitive land uses, the resource/processing area and the transportation route of the KRA. 	<p>A02</p> <p>No acceptable outcome provided.</p>
<p>P03</p> <p>Development does not significantly impact on the amenity of existing sensitive land uses or residential zones within and external to the Separation Area.</p>	<p>A03</p> <p>No acceptable outcome provided.</p>
<p>P04</p> <p>Development:</p> <ul style="list-style-type: none"> (a) does not adversely impact on the efficient transportation of extractive material; and (b) ensures safe access onto a designated transport route. 	<p>A04</p> <p>The number of properties with access points to the transport route is not increased.</p> <p>OR</p> <p>Access points are designed to avoid adversely affecting the safe and efficient operation of vehicles transporting extractive materials.</p>
<p>P05</p> <p>Development (excluding uses associated with the operation of KRA 66) does not gain direct access to Hymix Road.</p>	<p>A05</p> <p>No acceptable outcome provided.</p>

Attachment B1 - Applicants claimed compliance

2019-05-20 Section 2 - The main application.pdf

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Performance outcomes	Acceptable outcomes	Does the proposal meet the acceptable outcome? If not, justify how the proposal meets either the performance outcome or overall outcome	Internal use						
Hours of operation									
P06 Activities undertaken on site are conducted within appropriate hours to minimise nuisance to adjoining and surrounding development.	AO6.1 Extracting, crushing and screening operations, loading of materials and maintenance occur only within the following hours: <table> <tr> <td>Monday to Friday</td><td>7.00am – 6.00pm</td></tr> <tr> <td>Saturday</td><td>8.00am – 12 noon</td></tr> <tr> <td>Sunday and public holidays</td><td>nil</td></tr> </table>	Monday to Friday	7.00am – 6.00pm	Saturday	8.00am – 12 noon	Sunday and public holidays	nil	THE DEVELOPMENT GENERALLY COMPLIES WITH AO6.1 HOWEVER, THE APPLICANT SEEKS CONSENT TO CARRYOUT SALES AND MAINTENANCE ON A PUBLIC HOLIDAY. The applicant confirms that no extraction activities will occur on a public holiday period however, would like the ability to maintain sales and site maintenance. Both activities are not considered to cause nuisance to adjoining and surrounding development.	
Monday to Friday	7.00am – 6.00pm								
Saturday	8.00am – 12 noon								
Sunday and public holidays	nil								
AO6.2 Blasting and explosions are conducted between the hours of 9am and 5pm Monday to Friday excluding public holidays.	NOTED.								
Transport routes and access									
P07 Extractive industry activities use only the designated transport routes as shown on the Extractive resources overlay map .	A07 No acceptable outcome provided.	COMPLIES PER EXISTING.							

ISPT # 71564166 v1 - CITY PLAN VERSION 6 - CODE TEMPLATE - EXTRACTIVE INDUSTRY DEVELOPMENT CODE

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City Plan

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City Plan / Part 9 Development codes / 9.3 Use codes / 9.3.8 Extractive industry development code

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This code applies to assessing material change of use for development for Extractive industry where indicated within **Part 5 Tables of Assessment**.

When using this code, reference should be made to **Section 5.3.2** and, where applicable, **Section 5.3.3**, in **Part 5**.

9.3.8.2 Purpose

- (1) The purpose of the development code is to manage the impacts of extractive industries on the environment and sensitive land uses surrounding the development and ensure rehabilitation and re-use occurs in a manner consistent with the **Strategic framework**.
- (2) The purpose of the code will be achieved through the following overall outcomes:
 - (a) Extractive industry is separated from sensitive land uses and residential zones to ensure amenity impacts including visual, light, noise, dust, odour and vibration are at an acceptable level.
 - (b) The impact of traffic, transport and on site operation noise on residential and other sensitive land uses is minimised.
 - (c) Sites are progressively rehabilitated to stabilise land, restore ecological values, reduce visual impact caused by extraction and provide land suitable for adaptive re-use. Adaptive re-use and end uses provide for a range of appropriate activities consistent with the **Strategic framework**.
 - (d) Extractive industry activities protect the visual character and amenity of the surrounding area, are located below the peak of a ridgeline and are visually screened to enhance the city image.
 - (e) Extractive industry development within committed extractive resource areas is designed to protect environmental values of the site as far as practical.

City Plan

City Plan / Part 9 Development codes / 9.3 Use codes / 9.3.8 Extractive industry development code

Performance outcomes	Acceptable outcomes
Extractive industry management plan	
<p>PO1 Extractive industry activities are located, designed, operated and staged in a way that:</p> <ul style="list-style-type: none"> (a) minimises environmental impacts on site and surrounding areas; (b) prevents significant adverse amenity impacts on existing sensitive land uses or residential zoned land; and (c) promotes the efficient extraction of the resource. <p>Note – An extractive industry management plan should be submitted to demonstrate compliance with PO1.</p>	<p>A01 No acceptable outcome provided.</p>
Visual amenity	
<p>PO3 Extractive industry developments are screened or located in areas of least visual impact and minimise views of any significant infrastructure and visually obtrusive development from major roads and surrounding residential areas.</p>	<p>A03.1 Extraction or processing activities are not conducted within 40m of any boundary of the site.</p>
	<p>A03.2 Views of significant infrastructure and visually obtrusive development including quarry floors, benches and faces, are screened from the road frontage, major road corridors and adjoining residential areas.</p>
<p>PO4 Development protects the visual character and amenity of the area by ensuring ridgelines are retained as a natural feature and buffer.</p>	<p>A04 Development is located at least 40m away from any ridgeline, as measured horizontally from the ridge peak.</p>

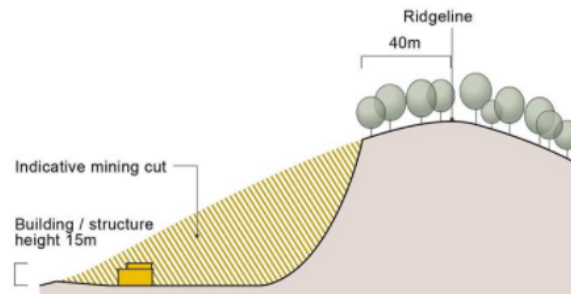


Figure 9.3.8-1

Illustration showing Extractive industry development is located at least 40m away from the top of the ridgeline, as measured horizontally from the ridge peak.

Attachment D2 - City Plan Extractive Industry Development Code - Visual Amenity

2019-05-20 Section 2 - The main application.pdf 160 / 354 110%

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9.3.8.3 Specific benchmarks for assessment

Table 9.3.8-1: Extractive industry development code – for assessable development

Performance outcomes	Acceptable outcomes	Does the proposal meet the acceptable outcome? If not, justify how the proposal meets <u>either</u> the performance outcome or overall outcome	Internal use
Extractive industry management plan			
PO1 Extractive industry activities are located, designed, operated and staged in a way that: <ul style="list-style-type: none"> (a) minimises environmental impacts on site and surrounding areas; (b) prevents significant adverse amenity impacts on existing sensitive land uses or residential zoned land; and (c) promotes the efficient extraction of the resource. Note – An extractive industry management plan should be submitted to demonstrate compliance with PO1.	AO1 No acceptable outcome provided.	COMPLIES. The intent of this development application is to enable the continual use of the site for current activities associated with extractive industries.	
Rehabilitation plan			
PO2 Extractive industry proposal ensures:	AO2 No acceptable outcome provided.	THE APPLICANT WILL CONTINUE TO REHABILITATE THE SITE IN ACCORDANCE WITH PART 7 OF THE EXISTING REZONING AGREEMENT. PLEASE REFER TO REHABILITATION MANAGEMENT PLAN SUPPORTING THIS DA FOR FURTHER INFORMATION.	

Attachment E1 - Key resource Area KRA 68

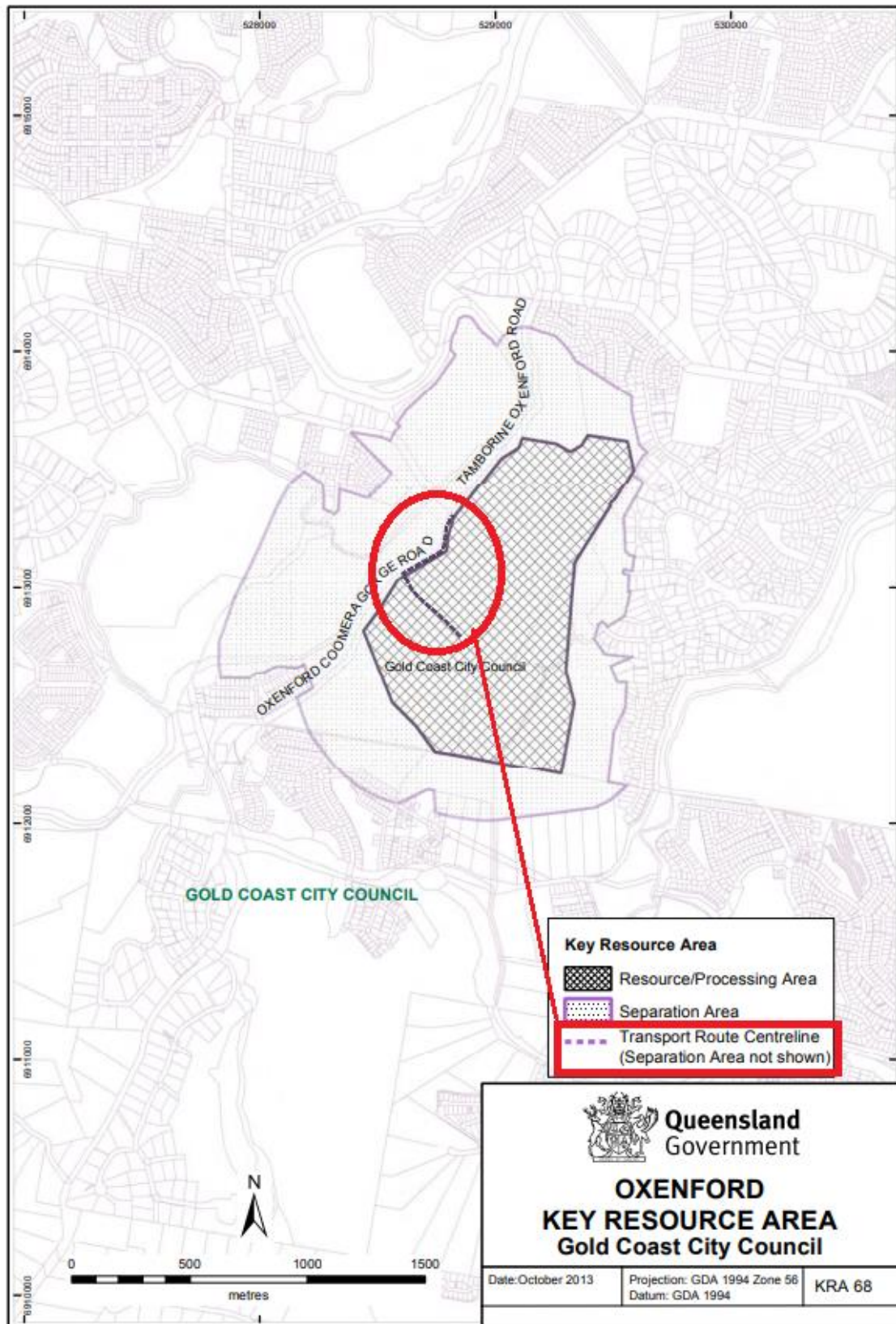


Table 2: KRA components

Component	Detail
Resource/ processing area	<p>The extent of the extractive resource and any operational areas associated with the extraction and processing of the resource.</p> <p>The boundary of the area is defined by the potential for extractive industry activities, and includes the resource area where blasting and other primary extraction would take place.</p> <p>The area can include adjacent areas where other extractive activities (such as crushing, screening and stockpiling) may occur.</p>
Separation area	<p>The separation area is the area surrounding the resource/processing area required to maintain separation from people who may be affected by residual impacts such as noise, dust and ground vibrations of existing or future extractive operations in the resource/processing area.</p> <p>The minimum distance is 200 metres for resources that do not require blasting or crushing to extract (sand, gravel and clay) and 1,000 metres for hard rock resources where blasting and crushing of material is required.</p> <p>An extractive resource might extend beyond the boundary of the resource/processing area and, where this occurs, an extractive industry could take place in the separation area, provided that the function of the separation area is not compromised.</p> <p>In some cases the separation area may be less than the minimum distances in consideration of local features such as topography or existing development commitments for incompatible land uses.</p>
Transport route	<p>The shortest practical route used to transport extracted resources to market.</p> <p>The transport route is a road or a rail link from the boundary of the resource/processing area to a major road or railway.</p>
Transport route separation area	<p>The area surrounding the transport route needed to maintain separation of people from undesirable levels of noise, dust and ground vibration produced as residual impacts from the transportation of extractive material. The distance is measured 100m from the centre line of the indicated transport route for a KRA.</p>

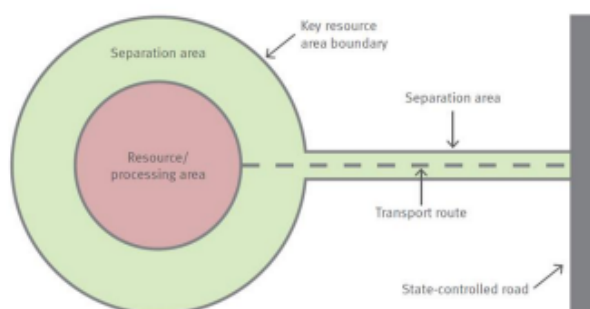


Figure 2: Components of KRAs

Attachment G1 - Department of Infrastructure, Local Government and Planning 'KRA Transport route'

KRA – Transport route	
Purpose	KRA – Transport routes show the shortest practical route used to transport extracted resources to market. The transport route is a road or a rail link from the boundary of the resource/processing area to a major road or railway.
Mapping category	Category 1
Data custodian	DNRM
Head of power	SPP July 2017

KRA – Transport route separation area	
Purpose	KRA – Transport route separation areas show the area surrounding the transport route needed to maintain separation of people from undesirable levels of noise, dust and ground vibration produced as residual impacts from the transportation of extractive material.
Mapping category	Category 1
Data custodian	DNRM
Head of power	SPP July 2017

Part 3

Mapping

Attachment H1 - Integrating state interests in a planning scheme - 'Transport route'

dsdmipprd.blob.core.windows.net/general/integrating-state-interests-in-planning-schemes-guidance-for-local-government.pdf

Integrating state interests in a planning scheme	
Transport route of a KRA	See the SPP Part F Glossary . This is the shortest practical route used to transport extractive resources to market. As the haulage of extractive resources may generate impacts (dust, noise, traffic congestion, road pavement impacts), the identification and protection of an unobstructed haulage route can help alleviate impacts.
Transport route separation area of a KRA	See the SPP Part F Glossary . The transport route separation area is measured 100 metres on either side from the centre line of the transport route.

Integrating State Interests In A Planning Scheme 71