



Our ref: DOC20/834620

Your ref: DA75/256-MOD 5

Mr Robert Hodgkins
Planning and Assessment Group
Department of Planning, Industry & Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Hodgkins

Subject: EES comments on Modification application for Spring Farm Quarry – extension of time (DA75/256 MOD 5) – 186 Macarthur Road, Spring Farm

Thank you for your email of 6 October 2020 requesting comments on the Modification 5 application for the Spring Farm Quarry which proposes to extend the life of the quarrying operations by a further two years from 30 June 2021 to 30 June 2023.

The Environment, Energy and Science Group (EES) appreciates the Planning and Assessment Group giving it an extension in which to provide its comments. EES has reviewed the MOD 5 application and provides its recommendations and comments in Attachment A.

Please note that from 1 July 2020, Aboriginal cultural heritage (ACH) regulation, including advice on development applications, is now managed by the Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

20/10/20

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science Group**

Attachment A**Subject: EES comments on Modification application for Spring Farm Quarry – extension of time (DA75/256 MOD 5) – 186 Macarthur Road, Spring Farm**

The Environment, Energy and Science Group (EES) has reviewed the following documents:

- Environmental Assessment (EA) – August 2020
- Appendix F – Area of land remaining for extraction
- Appendix K - Landscape Management Plan – 11 December 2018
- Appendix M – Landscape Rehabilitation and Bush Regeneration Report - 24 August 2020
- Appendix O – proposed Continuation of Operation – Consultation outcomes report – 10 August 2020

and provides the following comments.

Flood

The Office of Environment and Heritage (OEH) has previously provided response on Modification 3 dated 9 October 2012 recommending a Flood Emergency Response Plan be prepared for floods above the 1% AEP flood event up to the full range of flooding including the probable maximum flood. OEH also highlighted the recommendation on its response dated 27 March 2018 during Modification 4. Both previous responses are still relevant to the Modification 5 proposal.

Landscape Rehabilitation

EES notes at quarry closure the site will be composed of several zones, including:

- Nepean River Riparian Vegetation (Zone 1a and 1b)
- Dry River Anabranh Vegetation (Zone 2a and 2b)
- Agricultural Production land (Zone 3)
- Riparian Linkage Zone (Zone 4) (Section 4, page 10 of Appendix K).

Appendix M implies the MOD 5 proposal will delay proposed tube stock plantings in Zone 2(b) – the western side of the dry anabranh as it notes plantings cannot occur until the final landform on the eastern side of the anabranh has been fully extracted (page 9). It is unclear if the MOD 5 proposal will delay the revegetation /replanting for a further two years in any other areas on the site that are proposed for replanting. The Response to Submissions Report (RtS) should clarify this.

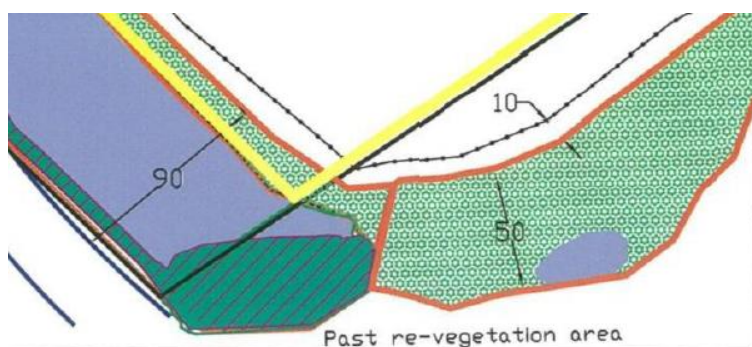
Appendix M states the riparian linkage zone “is considered a zone of ecological importance as it links the Nepean River Riparian Corridor and the Dry River Anabranh remnant vegetation corridor providing a broad connection and habitat corridor for native wildlife to traverse the site (page 9). It is not clear from the documents provided if replanting of the riparian linkage (Zone 4) has been completed, or if further planting/ revegetation is required. The RtS should clarify this, as:

- Appendix M states “the native vegetation structure has benefited from concerted woody weed control and revegetation efforts over recent years and is currently presenting in good condition with limited weed diversity” (page 9). This implies the riparian linkage has been replanted
- Figure 30 (Final landform and rehabilitation management plan) in the EA for the MOD 5 proposal shows the riparian linkage is proposed to be planted (page 78). EES notes it is not shown on Figure 16 - Extraction and Rehabilitation Staging Plan in the EA (page 28).
- Figure 3 (Final landform and rehabilitation management plan) in Appendix K shows the riparian linkage (Zone 4) is proposed to be planted.
- Appendix K states “all revegetation tasks will commence upon completion of final landform levels” (page 15)
- Appendix 3 in Appendix K states:

- “This elevated platform of land that links the Nepean River with the Dry Anabranh at the southern boundary between Lot 22 and Lot 1 has been completed and revegetated and stabilised with grasses ready for additional landscape plantings to occur” (section 2.1.3).
- the restored landform levels for this previously extracted site have been instated and the site can now be prepared for a revegetation program (section 6.2)
- “revegetation preparation were delay due to ongoing drought conditions. An improvement in rainfall conditions in the 2018-2019 program will allow for this area to be revegetated” (section 6.2).

It appears from Appendix F the areas of land remaining for extraction are not located near the riparian linkage. Therefore, if further planting is required the MOD 5 proposal would not delay such planting in the riparian linkage. The RtS should clarify this.

Figure 31 in the EA also appears to show widths of the revegetation areas. The RtS needs to clarify if the numbers shown are the widths of the planted areas in metres. For example, is the riparian linkage meant to be 50 m wide at the location shown below:



End of Submission