

Our Reference: Tarrawonga Mod
Your Reference: MP11_0047 Mod 8
Contact Name: Daniel Boyce

NSW Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Attn: Phillip Neville

Thursday, 27 February 2020

Dear Sir

**RE: MODIFICATION 8 TO SSD 11_0047 – TEMPORARY WATER HAULAGE –
TARRAWONGA COAL MINE (MP11_0047-Mod-8)**

Thank you for the opportunity to make a submission in response to the abovementioned application to modify State Significant Development (**SSD**) Application 11_0047. Council has reviewed the documentation submitted with the application and wishes to raise the following matters to be addressed by the applicant.

1. Duration of Modification

The application documentation indicates that the modification intends to permit the extraction and carting of up to 1.6 megalitres of water per day for a period of approximately 18 months. However, it is intended that further periodic transportation of water may be required ongoing during operation of the mine.

There are no parameters provided around the on-going operation of this temporary water haulage. In this regard, the applicant is requested to provide further information to provide clarity/triggers for when the water haulage would be required after the initial 18-month period.

2. Impacts of the Modification

The documentation submitted with the application has not provided consideration of the impacts of the modification other than for road transport. The modification involves the extraction of groundwater from a bore on another site associated with another approved mine. Therefore, further assessment is required for all the impacts of the proposed modification, including those as outlined below.

- (a) The application states that the extraction of groundwater and use of the pipelines, tanks and associated infrastructure would be non-exclusive to Tarrawonga. Therefore, further details are required to be provided to




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outline how the water supply will be managed between the two sites and approvals.

- (b) The proposed modification intends to extract up to 1.6 megalitres per day of groundwater. It needs to be demonstrated that the bore can sustain the intended yield along with the yields that all other approvals the are relying upon the use of the bore.
- (c) A groundwater impact assessment is to be undertaken to determine the impacts of the modification on groundwater, including any cumulative impacts.
- (d) Further consideration of the development as modified in terms of the Precautionary Principle is to be provided. In particular, consideration is to be given in terms of uncertainty relating to:
 - i. Groundwater impacts, including cumulative impacts.
 - ii. Exacerbation of impacts of drought for other industries through mining operations out-bidding for water allocations and consequential distortion of local water markets as reported in the ABC/730 Report investigation¹.
- (e) Further consideration of the development as modified in terms of inter-generational equity is to be provided. In particular, consideration is to be given to:
 - i. the depletion of the groundwater resources as a result of this project as modified including associated cumulative impacts.

3. Limit to Traffic Generation

The application contends that the proposed modification will not result in an increase in total traffic generation by the development compared to the original approval. This is a result of a change in heavy vehicle used to ones with an increased payload.

This modification application has not considered impacts to the traffic network on the basis that there is no increase in total traffic generation. Therefore, it is requested that a condition be imposed on the consent as modified to cap total traffic associated with the development at 524 heavy vehicles per day, including any water carting vehicles.

¹ <https://www.abc.net.au/news/2019-11-05/maules-creek-coal-mine-underinvestigation-again-over-water-use/11658718>

4. Contributions

The Voluntary Planning Agreement (**VPA**) that has been entered into for this project, in relation to the tonnage contributions for infrastructure contributions, only relates to the quantity of coal sold. Given the additional impact of the water carting, it is considered that the VPA should be extended to include contributions for the water carting given the impact on the road network.

5. Use of Local Resources

Council requests that the Mine operator make a concerted effort to engage local tradespeople/contractors, material and resource providers, and employees during the modification period.

If you require any further clarification, please do not hesitate to contact Council's Development and Economic Growth Department on 6799 6855.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Daniel Boyce', with a long horizontal stroke extending to the right.

Daniel Boyce

Executive Manager Planning and Environment