



HUNTER WATER CORPORATION
ABN 46 228 513 446
PO Box 5171
HRMC NSW 2310
36 Honeysuckle Drive
Newcastle NSW 2300

22 July 2025

Our Ref: HW2015-1413/61

Energy & Resource Assessments, Development Assessment
Department of Planning and Environment
Locked Bag 5022 Parramatta NSW 2124

Attention: Jarrod Blane
via the Major Projects Portal

Dear Jarrod,

RE: CABBAGE TREE ROAD SAND QUARRY MODIFICATION 4 (SSD-6125-Mod-4)

Thank you for providing Hunter Water Corporation (Hunter Water) with the opportunity to comment on the proposed Modification 4 to the existing Cabbage Tree Road Sand Quarry at 398 Cabbage Tree Road, Williamtown.

From a review of the proposed Modification 4 report, the elements of the proposal that are of primary interest to Hunter Water include:

1. The proposed western extension of the extraction area on adjacent land and resource boundary adjustments; and
2. Permitting the importation of up to 6,000 tonnes per annum of Virgin Excavated Natural Material (VENM) sand with provenance from construction sites within local sand beds for on-site processing.

Tomago Sandbeds Catchment Area

The Cabbage Tree Road Sand Quarry is located on the Tomago Sandbeds aquifer, near the southern boundary of this landscape unit, and predominantly within the Tomago Sandbeds Special Area, a gazetted drinking water catchment area under the *Hunter Water Act 1991*. The proposed modification 4 is located entirely within the special area.

The aquifer can supply up to 30% of the region's drinking water supply and plays an important strategic function for Hunter Water as a critical contingency water source, providing water supply resilience for climatic and water quality hazards in other water storages, such as drought, blue green algal events, and severe storms. Further, native ecosystems occurring on the land overlying the aquifer provide an important water quality protection function, are recognised as providing very high value habitat for biodiversity and provide an important ecological corridor function in the Lower Hunter region.

The aquifer requires appropriate management to:

- protect the drinking water source from potential water quality and/or quantity impacts caused by land use activities; and
- protect the high biodiversity and regional ecological corridor values present.

Accordingly, potential impacts on these matters from the Modification 4 proposal are the main areas of interest to Hunter Water.

Hunter Water expects that all development in drinking water catchments will achieve a Neutral or Beneficial Effect (NorBE) on water quality in the catchment area.

Western extension and resource boundary adjustments

The existing quarry operation has been designed to comply with the NorBE requirement, approval conditions have been imposed to ensure this occurs and these are supported by operating protocols and site management plans. Provided there are no proposed changes to operating methods that would impact on compliance with this requirement and the proposed additional management controls are implemented, Hunter Water has no objections to this aspect of the proposed modification.

However, we note the higher level of disturbance in the proposed western extension area, the proposal to rehabilitate this area to grassland and the commensurate additional risks associated with achieving site rehabilitation objectives in other parts of the project area as a result of the disturbed land. This will require greater attention to detail and management of the site rehabilitation processes in parts of the site that are adjacent to the western extension area. Alternatively, rehabilitating the eastern part of the proposed western extension area with a native vegetation buffer (in the order of at least 30 metres) should assist greatly in achieving the rehabilitation objectives in other parts of the project area. In reality, the ongoing occupation and management of the western extension area after the completion of quarrying operations is considered to present a greater risk to the aquifer and surrounding residents than the quarry operations.


Comments regarding sporadic low levels of PFAS detected at the quarry to date are noted. While the proposed western extension area is outside the EPA's PFAS management zone, the risk of further detections remains and should be considered as an integral part of the quarry's operation and risk management.

VENM importation and processing

Hunter Water understands that the proposed importation of VENM from nearby sand sources is to allow on-site processing and sale of commercial sand products. The management controls proposed to be implemented to avoid potential impacts such as chemical contamination or the introduction of weeds, are considered acceptable to Hunter Water. Consequently, Hunter Water has no objection to this aspect of the proposed modification.

If you would like any further information, please do not hesitate to contact Kirby Morrison at kirby.morrison@hunterwater.com.au.

Yours sincerely



Varun Agashe
Manager Development Services