



NSW National Parks and Wildlife Service

Your ref: SSD-9099356
Our ref: DOC25/962409-1

Ms Allison Sharp
Team Leader Assessments - Energy and Resources Open Cut
Department of Planning, Housing and Infrastructure
Via Major Projects Portal and
By email: allison.sharp@planning.nsw.gov.au

Dear Ms Sharp

Thank you for your notification regarding the response to submissions (RTS) for the Holcim Salt Ash Sand Operations (SSD-9099356). Please accept this response as an update to the advice previously provided by the National Parks and Wildlife Service (NPWS).

The NPWS advice noted groundwater impacts remain a concern. I note the submissions from DCCEEW Water and the NSW Environment Protection Authority (EPA) outline specific risks to groundwater water, including sea water intrusion, pollution from metals mobilised from acid sulfate soils, potential for PFAS migration from the adjoining contamination area, and project specific and cumulative drawdown on groundwater. Important concerns remain regarding these risks. The feasibility and efficacy of the proposed risk mitigation actions are also in question.

The Worimi Conservation Lands (WCL) plan of management identifies impacts from adjoining sand extraction as a key risk to the park. NPWS notes there is currently no other extraction operation involving dredging below groundwater level directly adjoining the WCL and associated outer barrier dune landscape, and none that have been through a complete assessment process and been approved. DCCEEW Water note impacts from comparable dredge pond activities within the broader Stockton Bight barrier landscape at Tomago.

The risks outlined by DCCEEW Water and the EPA are significant and threaten the cultural and natural values of the WCL.

DCCEEW Water and the EPA both refer to the long-standing practice of conditioning extraction projects in this environment to ensure there is no interaction with groundwater. I note the recommendation by the EPA that sand extraction/mining in this location be limited to a depth of 1 metre above the groundwater table to mitigate the significant water-quality risks.

The risks identified from sand extraction at and below groundwater level at locations adjoining the WCL and at locations where this activity will drawdown groundwater at the WCL pose an unacceptable risk to the WCL. NPWS objects to the project in its current form. This replaces the previous NPWS recommendation regarding conditions to limit groundwater impacts.

If you have any further questions about this issue, please contact Adam Faulkner, Principal Project Officer, Hunter Central Coast Branch, on 02 4927 3253 or at adam.faulkner@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kylie Yeend', written in a cursive style.

Kylie Yeend
**Director, Hunter Central Coast
National Parks and Wildlife Service**
12 November 2025