



Our reference: DOC20/239167

Lands Stakeholder Relations
NSW Department of Planning, Industry and Environment – Crown Lands
Via email: lands.ministerials@dpie.nsw.gov.au

Dear Lands Stakeholder Relations

**Blue Bush Project – Major Project (SSD_8968782),
Unincorporated Area of NSW**

I refer to the email (sent Thursday 8 October 2020) and request to the Far West Area of the NSW Department of Industry, Planning and Environment– Crown Lands (the department), in relation to the above project.

The department acknowledges that the Scoping Report details many of the items that Crown land considered important and relevant to the proposed project. Additional items that the department feels need to be further reviewed for inclusion in the Secretary's Environmental Assessment Requirements (SEARs), and subsequently the Environmental Impact Statement (EIS), are listed below:

Note: The comments below relate to the Blue Bush Transfer Station (BBTS), the Blue Bush Facility (BBF), the proposed quarries, all linear infrastructure and any/all other areas that are disturbed as part of the Blue Bush Project.

Licences and Easements

The scoping report notes that additional linear infrastructure is likely to be required for BBTS and BBF, in the form of such items as rail line and loading areas, additional rail corridors and possible electrical infrastructure to connect into main transmission line. Easements will likely be required for all linear infrastructure, including the following proposed infrastructure:

- 1) Transport route connecting the transfer station at the BBTS, south to Pinnacles Road (Figures 2-5 & 2-10);
- 2) A new connection from the BBTS and BBF into the existing transmission line (Figures 2-10 & 2-11); and
- 3) Proposed rail spur off the Adelaide-Sydney Railway Line at the BBTS which will enable the transfer of waste arriving to site*.

* The department suggests a figure be included in the Environmental Impact Statement (EIS) that outlines the proposed location of the rail spur.

The department acknowledges that easements can take up to 12 months to complete the required survey and registration. If early acquisition and use of the proposed occupied lands is required, the proponent may apply for a Crown lands licence (issued under the *Crown Lands Management Act 2016*) over the affected area(s). Once the easement is registered, the licence would then be terminated. It is a departmental requirement that any and all easements (or respective licence) must be obtained prior to any activity occurring.

In regards to the proposed quarries, these will likely need to be covered under Crown lands licence.

These processes should be fully outlined in the EIS document.

Water Resources and Dust

- Specific information would be appropriate in the EIS which identified the source and quality of water required during the construction, operation and rehabilitation of the site. (NB. If a pipeline is proposed, an easement will likely be required to authorise this infrastructure- see above).
- Water may also be required for dust suppression and capping activities on all exposed areas, including access roads and for irrigation of vegetation during rehabilitation stages. The department suggests that monitoring of the electrical conductivity of groundwater in undertaken (especially if a dedicated bore field is proposed to be used). This is needed to provide information on potential salinity threats, especially should water become present on the ground surface for extended periods.
- Section 2.5.6 notes that groundwater will be monitored alongside subsidence, once waste cells are capped. Is any monitoring/management of surface water control planned?
- The EIS should outline the proposed water containment and disposal methods (inclusive of volume, frequency and location of any water discharges).

Pests and Weeds

- Identification and monitoring of existing weeds and feral animals, together with management measures for their control during construction, operation and rehabilitation.

Waste

- Accurate estimates of the quantity and nature of the potential waste products produced by the project during construction, operation and closure.
- Disposal strategies and locations for all waste products (inclusive of hydrocarbons, general waste/rubbish, sewerage and grey water).
- Management and mitigation plan that outlines the measures to avoid, minimise, mitigate and monitor the production of waste, and ensure that it is appropriately managed.

Materials Storage

- The EIS should outline the proposed methods and locations for the safe storage of construction and operating materials, including hydrocarbons and dangerous goods.
- Methods for clean-up and containment control of spills should also be detailed in the EIS.

Rehabilitation and final land use / landform

- Section 2.5.2: The department notes the stripped vegetation and excavated topsoil (including clay) from the development will be stored and used for future rehabilitation purposes. The proponent needs to be aware of and mitigate any potential land contamination from weathering of stored topsoil on the ground surface. The gradient of the land where topsoil will be stored also needs to be considered and assessed with an outcome to minimise erosion, water/sheet wash of soils and mitigate sediment control, as well as maintain the viability of the seed bank.
- The EIS should detail the proposed remediation (including methodology and timing), including the below:
 - Details of the progressive stages of rehabilitation;
 - Methods for removal of structures, plant and equipment;
 - Proposed final land use and landform, including conceptual diagrams/information of the anticipated final landform; and
 - Detail methods of rehabilitation (topsoil distribution, erosion control, revegetation, weed and feral animal control), and monitoring methods once operations have ceased.

Socio-economic issues

The EIS should detail socio-economic issues such as site access details, signage, security including fences and locked gates, and access by emergency services (as required).

Financial costings/assurances

The EIS should detail all costings, insurances and environmental assurances for ongoing management and monitoring of the site(s) post-closure and rehabilitation.

The department supports a commitment to environmental management and mitigation measures, including monitoring, reporting and/or independent environmental auditing requirements.

If you have any further queries in regards to this matter, please do not hesitate to contact Pip Sokol on (02 6883 3356 - pip.sokol@crowmland.nsw.gov.au) or myself (02 6883 5411 - shaun.barker@crowmland.nsw.gov.au).

Yours sincerely



Shaun Barker
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Crown Lands - Far West Area

19 October 2020