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RE: Dubbo SSD 10417 - Request to Secretary to retain certain “Surface infrastructure” under condition B56 Table 7

1.0 Introduction

We wish to thank the Department staff for meeting with Holcim on Friday 13 March 2026 to discuss the matters raised in the Request for Information dated 21 January 2026 regarding the Dubbo Quarry Rehabilitation Management Plan v1 dated 18 September 2025. Holcim has uploaded a revised Rehabilitation Management Plan v2 dated 25 March 2026 (inclusive of a tracked edited version see also enclosed table to summarise Holcim’s adjustments to the matters raised). Based on the discussions during this meeting, this letter has been prepared by Holcim, to request the Planning Secretary agree to retaining certain “Surface infrastructure” under condition B56 Table 7 of SSD 10417 Development Consent, and explanation with reasons for the same as detailed in this letter. Condition B56 Table 7 states in part:

Rehabilitation Objectives

B56. The Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must be consistent with the rehabilitation strategy set out in the EIS and conceptual final landform plan in Appendix 5, and must comply with the objectives in Table 7 (extracted relevant row from Table 7 below with our emphasis in bold).

Table 7: Rehabilitation objectives

Feature	Objective
Surface infrastructure areas	All infrastructure decommissioned and removed, unless otherwise agreed by the Planning Secretary

No changes to condition B56 are proposed. This letter requests the Planning Secretary's agreement to retain certain surface infrastructure so as to provide certainty to the Rehabilitation Management Plan. This letter is submitted concurrently with Holcim's Rehabilitation Management Plan v2 for Dubbo Quarry to the DPHI Request for Information (RFI) dated 21 January 2026.

As such, Holcim requests the Planning Secretary consider the requests in this letter at the same time as the responses prepared to the DPHI RFI letter dated 21 January 2026 and the changes made to the Dubbo Rehabilitation Management Plan.

2.0 Request to Retain Certain Surface Infrastructure

The "surface infrastructure" requested to be retained as part of post-closure when quarry activities / extraction ceases, includes:

1. The Surface Water Diversion Drain approved along the eastern portion of the site under condition B33 of SSD 10417 Development Consent; and
2. The Eulomogo Creek Crossing bridge was approved (now constructed) as a connection between the land north of Eulomogo Creek and the land to the south of Eulomogo Creek (to the Southern Extraction Area (SEA)) under condition B37 of SSD 10417 Development Consent and the associated access road.

The above request seeks the retention of surface infrastructure which will assist in making certain the outcomes when extraction ceases and the rehabilitation actions proposed in response to the Department's Request for Information dated 21 January 2026 to Holcim's draft Rehabilitation Management Plan v2 dated 24 September 2025.

2.1 Retention of Surface Water Diversion - condition B33

The retention of the surface water diversion drain required under condition B33 of SSD 10417 Development Consent, is required water management infrastructure to avoid overland flow into the existing Eastern pit. The surface water diversion drain is required under SSD 10417 so as to avoid unregulated flow of water overland into the existing Eastern Pit void area (noting the existing Eastern pit void was created as a result of the Council granting the 1980 Development Consent for extraction prior to SSD 10417 being granted approval).

The approved surface water diversion drain along the eastern boundary of the site serves the purpose of redirection of overland water from upstream developed land. The retention of this surface infrastructure post closure will provide a direct benefit to adjoining lands, will provide certainty in the implementation of the Rehabilitation Management Plan and assists in the wider water management of the locality by provision of a trunk drainage management system for nearby developed properties including the adjoining quarry and solar farm to the north of the site and the concrete batching plant to the east.

2.2 *Retention of Eulomogo Creek Crossing (condition B37)*

The now constructed Eulomogo Creek Crossing (Creek Crossing) has been designed to ensure minimal impact to Eulomogo Creek, maintain flow of water in Eulomogo Creek during rain events in this location, structurally designed to carry the load of the heaviest vehicles operating fully loaded at the site, its width wide enough to accommodate two-way movements without adversely impacting path of travel. Retention of this infrastructure will reduce creek disturbance; and will avoid repeated vehicles crossings through water during rain events, so as to avoid sediment, erosion and turbidity; and will provide practical access for future vehicles associated with farming and land management use such as the transportation of livestock, fencing maintenance; and emergency access for bushfire response, flood recovery and utility access.

3.0 Conclusion

For the above reasons, it is requested that the Planning Secretary agree to the retention of the surface infrastructure areas including the Surface Water Diversion Drain and Eulomogo Creek Crossing. If you wish to discuss the matter further, do not hesitate to contact me at marian.higgins@holcim.com or 0491 974 806.

Regards,

A handwritten signature in black ink, appearing to read 'M. Higgins'.

Marian Higgins
Planning Approvals Manager NSW & ACT

Summary table of DPHI RFI dated 21 January 2026 (columns 1 and 2) with Responses (column 3)

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
Rehabilitation – Rehabilitation Objectives	-	
B56. The Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must be consistent with the rehabilitation strategy set out in the EIS and the conceptual final landform plan in Appendix 5, and must comply with the objectives in Table 7:	Figure 2.1 of the Rehabilitation Management Plan (RMP) contains a substantially decreased area of 'native ecosystem' when compared to Appendix 5 of the conditions of consent (e.g. the area immediately south of the existing west pit is entirely removed, while other areas have reduced size). Please amend figure 2.1 and 3.1 accordingly or provide justification for a reduced area of native ecosystem in the final landform. Section 3.2.3 states that a water storage area will remain in the western extension area (WEA). This is inconsistent with Appendix 5 of the development consent and the Rehabilitation and landscape management strategy (EIS, Appendix J). Please confirm the proposed final landform for the WEA. The EIS (Section 2.3.13) indicates pond 1 is located on the eastern end of the pre-SSD 10417 west pit, while the RMP states pond 1 is located in the WEA (section 3.2.3). Please confirm the location of pond 1 and update figures 2.1 and 3.1 accordingly.	Figure 2.1 has been updated by EMM: - To include Appendix 5 (as originally prepared by EMM) from Development Consent as its base, to ensure the area immediately south of the existing west pit is included and along with all other areas, the final landform does not seek to reduce any areas of native ecosystem and all areas as approved in Appendix 5 are replicated. - To include the details developed in this RMP v2 - tracked. - Please note: surface infrastructure including surface water diversion, Eulomogo Creek Crossing and associated infrastructure such as the access driveway are proposed to be retained. Figure 3.1 has been updated by EMM: - To include Appendix 5 (as originally prepared by EMM) from Development Consent as its base, to ensure the area immediately south of the existing west pit is included and along with all other areas, the final landform does not seek to reduce any areas of native ecosystem and all areas as approved in Appendix 5 are replicated. - To include the details developed in this RMP v2 - tracked. - Please note: surface infrastructure including surface water diversion, Eulomogo Creek Crossing and associated infrastructure such as

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
		the access driveway are proposed to be retained. Section 3.2.3 has been adjusted and corrected. The large water storage area is already located in the east pit as shown in the Water Management Plan and approved in the figures of “<i>Appendix 2 Figure 2: Water management system with surface water diversion</i>”, and “<i>Appendix 5 Conceptual Rehabilitation Plan</i>” of SSD 10417 Development Consent. Holcim does not wish to alter the location of the water Pond 1 (also referred to in the EIS and other management plans as storage area / East Pit Lake) by any information inadvertently included in the RMP v1 dated 24 Sep 2025, as such the RMP v2 with tracked edits has removed reference to the “Western Extension Area” (WEA) and replaced it with the “existing Eastern pit”. Please tracked edits to Section 3.2.3.
Table 7: Objectives	-	

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
All areas of the site affected by the development: Hydraulically and geotechnically stable	Section 5.3.4 states that an overall gradient of 1:3 (~32°) will be achieved for the WEA and SEA. I note a 1:3 gradient equates to an 18.4° angle or 33% gradient and, as detailed in the Closure Stability Assessment (Encompass, 2025), this gradient must be achieved for the quarry to be considered geotechnically stable. I also note Section 5.3.4 states a 1:3 gradient will be achieved '<i>where practicable</i>'. Amend the wording to ensure consistency with the Closure Stability Assessment and to ensure clarity for %, slope and angle. Section 5.3.2 states the diversion drain may be removed subject to a review to be undertaken prior to the cessation of quarrying. However, this section also states that the diversion "<i>will be removed and rehabilitated to avoid overland flow through the operational pit and associated infrastructure areas</i>". Given the diversion drain diverts upstream water around the east pit, please describe how its removal would 'avoid overland flow through the operational pit and associated infrastructure areas'. Further, please review and amend the section to remove any additional contradictions.	Section 3.2.2 and Section 5.3.4 have been adjusted to confirm the gradient, % slope and degree angle: 1V:3H which equates to an angle 18.4% or 33 degrees. Wording has been amended to be consistent with the Encompass Mining Solutions (EMS) 2025 Closure Stability Assessment included in Appendix 2 of the RMS v2. The words "where practicable" have been removed throughout. Holcim has concurrently with this RMP v2, written a separate letter to the Planning Secretary to request retention of the surface water diversion (surface infrastructure area) post-quarrying under Condition B56 Table 7, and the RMP has been adjusted accordingly to retain this surface infrastructure. The quality of water which enters the surface water diversion drain system cannot be controlled by Holcim because Holcim does not own the upstream lands or the development operations on those lands (including the quarry, the solar farm and concrete batching plant) of overland flows from land in the upstream catchments. The water flowing overland to the north and east of the Holcim site have been the subject of various approvals granted by authorities to those landowners which are required to manage their water quality as part of their development consents. Please see tracked edits in Sections 5.3.2 and 5.3.4 to respond.

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
All areas of the site affected by the development: Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land	Despite update of the plan following the April 2025 RFI, it nonetheless remains unclear how this statement, on page 44, minimises visual impacts: <i>“The retention of the existing pit walls will allow the existing eastern pit to achieve the required outcome for a flowthrough water storage, and re-establish historic drainage pathways to Eulomogo Creek. Woodland pasture species will be direct seeded with fertiliser via hydroseeding onto the faces (where possible eg the eastern pit wall face) to establish areas of partial vegetation to reduce the visual impacts of the quarry faces where practicable.”</i> Further, the statement is non-committal stating, “<i>where possible</i>” and “<i>where practicable</i>”. Please amend the statement to detail which pit wall faces will be direct seeded, how this will minimise visual impacts and what alternatives will be implemented to the pit wall faces where direct seeding is not practicable.	The wording has been adjusted in Section 5.3.5 over pages 44 and 45. The words “where possible” and “where practicable” removed throughout.
Quarry pits and benches: Long term stable	See above comments regarding geotechnical stability.	Holcim engaged Encompass Mining Solution (EMS) to prepare a Closure Stability Assessment dated 9 Sep 2025 (EMS, 2025) as included in Appendix 2 of the v1 and v2 RMP to assess the long-term geotechnical stability and the amended RMP has cross-referenced this report and adjusted the batter gradients to 1V:3H equivalent to 33% or 18.4 degrees (as per EMS, 2025). The wording in the v2 RMP has been adjusted to be consistent.
Quarry pits and benches: Landscaped and vegetated using native species described in the EIS.	See above comment regarding the revegetation of pit walls	See above comments.

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
Final voids: Minimise the size, depth and slope of the batters of the final voids	See above comments regarding geotechnical stability.	See above comments.
Final voids: Managed to protect water quality and reduce salinity impacts	Please detail the predicted east pit water inflows under both proposed scenarios (retention & removal of the diversion drain) and highlight how these inflows are or are not sufficient to keep water quality in the east pit from deteriorating due to stagnation. Further, based on the above, please outline potential impacts on Eulomogo Creek. I note that this action was not adequately addressed in the update of the plan resulting from the April RFI.	As per meeting with Department on Friday 13 March 2026, the RMP now includes a scenario that certain surface infrastructure will be retained, being the: surface water diversion drain along the eastern boundary, the Eulomogo Creek Crossing with associated and access driveway. Holcim has written concurrently with the edits to v2 RMP a request to the Planning Secretary under condition B57 to seek the retention of these surface infrastructure areas. The RMP v2 has been adjusted accordingly and also cross-references the Water Management Plan to address the concern associated with Pond 1 – the eastern pit storage area water quality in Section 3.2.3 – Post Quarry Water Management.
B58. Within 12 months of the date of commencement of development under this consent, the Applicant must prepare a Rehabilitation Management Plan for the development. This plan must:	-	
(a) be prepared: (ii) in consultation with Council and Water Group;	No evidence of consultation with Council is provided, please include to satisfy the condition.	See Appendix 1
(b) provide detailed plans of the final landform, that demonstrates that the development will be consistent with the objectives in Table 7 and the nominated land uses;	See above comments	See updated Figures.

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
(c) include a conceptual closure plan that considers the hydrological and hydraulic impacts of the final void/s;	See above comments regarding water storage areas.	Addressed above.
(e) include detailed performance and completion criteria for evaluating the performance of rehabilitation of the site;	Insufficient detail is provided on water quality monitoring for the water storage areas. Annual monitoring for five years is insufficient to demonstrate the long-term suitability of overflow to Eulomogo Creek. Water quality monitoring must be undertaken at seasonally representative times to ensure the appropriateness of water quality through variations in climate/rainfall. Further, the parameters omit heavy metals, which are standard for water quality monitoring in quarry voids. Please update the RMP to detail an appropriate water quality monitoring program.	See Section 5.3.5 tracked updates. The water quality of Pond 1 (Eastern Pit storage area) will have been monitored throughout the duration of extraction to establish the baseline water quality as detailed in the Water Management Plan which includes details of the key analytes with criteria which trigger the relevant TARP in the Water Management Plan (noting the Water Management Plan will be subject to review from time to time). The water quality testing regime in the amended RMP has adopted the same key analytes for testing as those already detailed in the Water Management Plan. The water quality baseline will have been established because of the Water Management Plan criteria, including the safe spill level. The amended RMP includes the water quality monitoring program as that included in the Water Management Plan which has already been assessed as being appropriate. Given the monitoring regime included in the Water Management Plan has been adopted for the RMP, the proposed period of 5 years is unchanged.
(f) describe the measures needed to achieve the criteria in clause (e), including triggers for remedial action, where these performance or completion criteria are not met; and	The TARP provides insufficient detail in relation to water quality objectives, e.g. no trigger values are defined and the proposed response to exceedances lacks detail. Please update the TARP accordingly to satisfy the condition.	For consistency the TARP associated with water quality monitoring and associated key analytes as detailed in the Water Management Plan have been adopted for the RMP.

Condition	Department comment & action required	Responses (see tracked edits in RMP v2)
(g) include a program to monitor, independently audit and report on progress against the criteria in clause (e) and the effectiveness of the measures in clause (f).	See above comments regarding water quality monitoring.	Addressed above.