

Ref: SSD-30956841, LA32022  
MG

22 November 2021

Resource Assessments  
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Attention: Rose-Anne Hawkeswood

**ENVIRONMENTAL ASSESSMENT REQUIREMENTS FOR THE CRESCENT HEAD  
ILLMENITE STOCKPILE REHABILITATION PROJECT AT LOT 2281 DP 1153793,  
POINT PLOMER ROAD, CRESCENT HEAD**

I refer to your correspondence of the 9 November 2021, seeking Council's requirements for the Environmental Impact Statement (EIS) for the above proposal to be included in the Planning Secretary's Environmental Assessment Requirements (SEAR's) for the project (SSD-30956841).

Council considers that the following additional matters to those outlined in the draft SEAR's should be addressed in the EIS:

**Biodiversity**

Council's Comprehensive Koala Plan of Management mapping indicates that the site contains Primary (Class 1) and Secondary (Class 2A) koala habitat. The ecological assessment must therefore include an assessment of the proposal under the Kempsey Comprehensive Koala Plan of Management.

It is also noted that the previously submitted Biodiversity Development Assessment Report (BDAR) and EIS should be updated in response to comments made by the Biodiversity Conservation Division (BCD) of the Department of Planning, Industry and Environment dated 8<sup>th</sup> March 2021 (submission to development application T6-20-207 ref: DOC21/128515). The requested amendments included revision of the BDAR to:

- Amend the errors in calculating the survey effort for the various survey methods or provide further detail on how the trap nights were calculated for each survey method,
- Assume the presence of the Common planigale and Brush-tailed phascogale as species credit species or undertake adequate threatened species survey in accordance with Section 6.5 of the BAM or obtain an expert report in accordance with subsection 6.5.2 of the BAM,
- Include the koala as a species credit species and the koala species polygon mapped to include all the areas of PCTs 1230 and 1235 impacted by the proposal, and
- Include vegetation communities PCT1230 and PCT1235 as TEC's and revise the BAM calculator accordingly.

**Rehabilitation**

The originally submitted rehabilitation plan prepared by Pandanus Solutions dated April 2018 was lacking in detail and proposed inadequate maintenance and monitoring

arrangements. This plan was subsequently revised in response to comments made by Council and BCD on their letter of the 8<sup>th</sup> March 2021.

Council has not had the opportunity to review the revised rehabilitation plan dated the 5 May 2021 in detail but notes that the target plant communities have been revised and a monitoring period of 3 years is now proposed.

Council notes that the objectives of rehabilitation should be developed through consultation with the owners and custodians of the land and any other relevant state agencies such as NPWS or BCD prior to commencement of rehabilitation activities and, if necessary, a revised rehab plan be prepared.

## **Transport**

The original traffic impact assessment report (TIA) should be revised to satisfy Transport for NSW request for additional information of the 31<sup>st</sup> March 2021 (referral response for development application T6-20-207) to enable a proper assessment of the impact of the proposal on the local and regional road network including:

- Updated TIA and Road Safety Assessment,
- Quantitative assessment of compliance against technical standards such as safe intersection sight distances and provisions for turning traffic at intersections and accesses,
- Assessment of the swept paths of the largest design vehicle at key intersections along the haulage route.

Council also notes that the original TIA requires updating to reflect the revised proposal to truck all recovered material to the port facilities at Brisbane or Newcastle.

## **References**

The following guidelines, policies and plans should be included in Attachment 1:

- Kempsey Development Control Plan 2013,
- Kempsey Comprehensive Koala Plan of Management for Eastern Portion of Kempsey Shire LGA (Volume 1),
- State Environmental Planning Policy (Koala Habitat Protection) 2021.

Should you require any further information please contact Melanie Green on (02) 65663200 or email [melanie.green@kempsey.nsw.gov.au](mailto:melanie.green@kempsey.nsw.gov.au)

Yours faithfully,



Melanie Green  
TOWN PLANNER