



OUT20/12241

Tim Ward, Director Planning
Ethos Urban
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Sydney NSW 2000
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Dear Mr Ward

**Sancrox Quarry Expansion Project (SSD-7293)
Response to Submission**

I refer to your email of 22 September 2020 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) advising that you believe there is little value in progressing the groundwater model further and that the best course of action is to collect bore data and undertake an impact assessment.

We do not agree that this is an appropriate option. Your suggested alternative assessment does not comply with the requirements of the Secretary's Environmental Assessment Requirements issued for the EIS, or the requirements of the NSW Aquifer Interference Policy (Section 3.2.3). Given the degree of model development that has already occurred, and the fact that we have assessed it as appropriately constructed and well calibrated, the proponent is prematurely abandoning the modelling and peer review process.

Hence our recommendations provided at the EIS exhibition stage remain in place that you should 'assess and classify the groundwater model against the Australian Groundwater Modelling Guidelines and have the model peer reviewed'.

Please refer to **Attachment A** for more detailed advice on the above recommendations

Any further referrals to DPIE Water and NRAR can be sent by email to:
landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely

Liz Rogers
Manager, Assessments
Water – Strategic Relations
12th October 2020

**Sancrox Quarry Expansion Project (SSD-7293)
Response to Submission**

The Secretary's Environmental Assessment Requirements (SEARs) for the Sancrox Quarry Expansion project were issued to the proponent by the then Department of Planning and Environment in September 2017, incorporating correspondence from the (then) DPI Water Group that recommended that the Environmental Impact Statement (EIS) provide "a detailed assessment against the NSW Aquifer Interference Policy (AIP) (2012) using DPI Water's assessment framework."

We reviewed the EIS and found that although the model was appropriately constructed and well calibrated, there are a number of issues:

- The model was calibrated in steady state only and with no transient verification.
- There was no reference to the Australian Groundwater Modelling Guidelines (2012) in the EIS or its accompanying appendix.
- No report was given of a peer review and no classification made under these Guidelines.

The AIP (Section 3.2.3) requires State Significant Developments such as the Sancrox Quarry Expansion project to determine water predictions based on a complex modelling platform that is consistent with the Australian Groundwater Modelling Guidelines and be independently reviewed, robust and reliable and deemed fit-for-purpose.

The requested alternative assessment does not comply with the requirements of the SEARs issued for the EIS, or the requirements of the AIP.

END ATTACHMENT A