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Our Ref: HW2016-492

Director Resource Assessments  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Attention: Michelle Kirkman

By email: [michelle.kirkman@planning.nsw.gov.au](mailto:michelle.kirkman@planning.nsw.gov.au)

Dear Michelle

**SSD 7332 EIS – PROPOSED HARD ROCK QUARRY – BARLEIGH RANCH WAY, EAGLETON**

The purpose of this letter is to submit comment on the proposal by Eagleton Rock Syndicate P/L to develop a hard rock quarry at Lot 2 DP 1108702 Barleigh Ranch Way, Eagleton.

The proposed development falls within Hunter Water's Grahamstown Dam Drinking Water Special Area as gazetted in the *Hunter Water Regulation 2015*. Grahamstown Dam supplies approximately 40% of drinking water to the Lower Hunter.

Hunter Water's Operating Licence requires compliance with the Framework for Management of Drinking Water Quality that is part of the Australian Drinking Water Guidelines (ADWG). The Framework requires adoption of a multiple barrier approach to water quality, and states that "the most effective barrier is protection of source water to the maximum degree practical". Protection of land within the Special Area is key to ensuring that this barrier is effective. In accordance with the *Hunter Water Regulation 2015*, prevention of pollution or contamination of water in the Special Area is of paramount importance to Hunter Water.

Hunter Water has a number of concerns about the potential effects of the proposed development on water quality.

As indicated in our previous correspondence to the Department dated 10 May 2016, Hunter Water expects all development in drinking water catchments to demonstrate a Neutral or Beneficial Effect (NorBE) on water quality. Hunter Water considers a development demonstrates NorBE if the development:

- (a) has no identifiable potential negative impact on water quality, or
- (b) will contain any water quality impact on the development site and prevent it from reaching any watercourse, waterbody or drainage depression on the site, or

- (c) will transfer any water quality impact outside the site where it is treated and disposed of to standards approved by the consent authority.

Following an internal review of the Water Assessment prepared in support of the Environmental Impact Statement, Hunter Water is concerned that the Proponent has not demonstrated that the development will meet NorBE. Further, the Proponent has not provided sufficient justification for the proposed level of containment or demonstrated that the proposed water management system is feasible and effective.

Hunter Water has commissioned an independent expert review of the water management strategy for the site to assess the proposed development in more detail, and in particular confirm whether or not it is likely to meet the requirement for NorBE. This review will be submitted to the Department of Planning and Environment as an addendum to this submission when completed.

In addition to the issues outlined above, it should also be noted that a number of members of the Hunter Water Community Consultative Forum raised concerns with the proposed development at its last meeting, held on 28 February 2017, and asked that these matters be conveyed in this submission.

Further clarification and detail regarding our concerns will be provided in our addendum submission. If you require further advice or clarification regarding this submission, or questions regarding the application of NorBE, please contact me on (02) 4979 9545.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Withers', is positioned above the typed name.

**Malcolm Withers**  
**Senior Developer Services Engineer**