Planning, Industry & Environment

Mr Luke Edminson
Planning and Environment Manager NSW
HOLCIM (AUSTRALIA) PTY LTD
Level 8 Tower B
799 Pacific Highway
Chatswood, New South Wales, 2067

Via Email: luke.edminson@lafargeholcim.com

02/11/2020

Dear Mr Edminson

Holcim Salt Ash Sand Operations (SSD 9099356)
Planning Secretary's Environmental Assessment Requirements

Please find attached the Planning Secretary's Environmental Assessment requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the Holcim Salt Ash Sand Operations. These requirements have been prepared in consultation with relevant public authorities based on the information you have provided to date. The agencies comments are attached for your information (see **Attachment 2**). You must have regard to these comments in the preparation of the EIS.

Please note that the Planning Secretary may modify these requirements at any time. If you do not submit a Development Application (DA) and EIS within 2 years, you must consult further with the Planning Secretary in relation to the preparation of the EIS.

Prior to exhibiting the EIS, the Department of Planning, Industry and Environment (the Department) will review the document in consultation with relevant authorities to determine if it addresses these SEARs. You may be required to submit an amended EIS if it does not adequately address the requirements.

Please contact the Department at least two weeks before you propose to submit your DA and EIS. This will enable the Department to provide lodgement instructions, confirm the applicable fee, determine the required number of copies of the EIS and discuss potential exhibition periods.

The Department is currently developing a new environmental impact assessment guidance series for State significant projects in NSW which is likely to include a specific guideline for preparing an EIS. It is recommended that Holcim (Australia) Pty Ltd (Holcim) has regard to this guidance series, if released during preparation of the EIS.

The Department also wishes to emphasise the importance of continued effective and genuine community consultation during the preparation of the EIS. This process should provide the community with a clear understanding of the proposal and its potential impacts and include active engagement with the community regarding key issues of concern.

If your development is likely to have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval would be in addition to any approvals required under NSW legislation; however, there may be opportunity to streamline the two assessment processes in accordance with the Bilateral Agreement between the NSW and Commonwealth governments. Please contact the Commonwealth Department of Agriculture,

Water and the Environment to determine if an approval under the EPBC Act is required (http://www.environment.gov.au or 6274 1111).

If you have any questions about these requirements, please contact Colin Phillips on 02 9274 6483 / at colin.phillips@planning.nsw.gov.au.

Yours sincerely,

Matthew Sprott
Director
Resource Assessments (Coal & Quarries)
as delegate for the Planning Secretary

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*
Schedule 2 of the Environmental Planning and Assessment Regulation 2000

Application Number	SSD 9099356
Proposal	Holcim Salt Ash Sand Operations Project, which involves: · extending and increasing the depth of the existing Salt Ash Sand quarry to extract and process up to 550,000 tonnes of sand per annum for up to 30 years; · receipt of up to 200,000 tonnes per annum of sand from Anna Bay, Tanilba Bay and Cabbage Tree Road Quarries; · continued use of existing and upgraded infrastructure and services at the existing Salt Ash Sand quarry to process and dispatch up to 750,000 tonnes of sand per annum; · continued use of the existing site access off Oakvale Drive via Nelson Bay Road; · importation of Virgin Excavated Natural Material (VENM) for bank and ground stability and or use in rehabilitation; and · progressively rehabilitating the site.
Location	8 Oakvale Drive, Salt Ash, New South Wales, 2318 Lot 4 DP 774726 within the Port Stephens Local Government Area (LGA).
Applicant	HOLCIM (AUSTRALIA) PTY LTD
Date of Issue	02/11/2020
General Requirements	The Environmental Impact Statement (EIS) for the development must comply with the requirements in Clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000.* In particular, the EIS must include: · a stand-alone executive summary; · a full description of the development, including: - the resource to be extracted, including the amount, type and composition; - the site layout and extraction plan, including cross-sectional plans; - the production process and processing activities, including the in-flow and out-flow of materials and points of discharge to the environment; - surface infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process); - a waste (overburden, rejects, tailings etc) management strategy; - a water management strategy; - a rehabilitation strategy to apply during, and after completion of, extraction operations, and proposed final use of site; and - the likely interactions between the development and any existing, approved or proposed development in the vicinity of the site; · a strategic justification of the development focusing on site selection and the suitability of the proposed site; · a list of any approvals that must be obtained before the development may commence; · an assessment of the likely impacts of the development on the environment, focussing on the key issues identified below, including: - a description of the existing environment likely to be affected by the development, using sufficient baseline/ background data; - an assessment of the likely impacts of all stages of the development,

	including any cumulative impacts, taking into consideration any relevant laws, environmental planning instruments, guidelines, policies, plans and industry codes of practice; - a description of the measures that would be implemented to avoid, minimise, mitigate and/or offset the likely impacts of the development, and an assessment of: o whether these measures are consistent with industry best practice, and represent the full range of reasonable and feasible mitigation measures that could be implemented; o the likely effectiveness of these measures; and o whether contingency measures would be necessary to manage any residual risks; and - a description of the measures that would be implemented to monitor and report on the environmental performance of the development; · a consolidated summary of all the proposed environmental management and monitoring measures, identifying all the commitments in the EIS; · consideration of the development against all relevant environmental planning instruments (including Part 3 of the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007)*; · the reasons why the development should be approved, having regard to: - relevant matters for consideration under the *Environmental Planning and Assessment Act 1979*, including the objects of the Act; - the biophysical, economic and social impacts of the development, including the principles of ecologically sustainable development; - the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses; - feasible alternatives to the development (and its key components), including the consequences of not carrying out the development; · a signed declaration from the author of the EIS, certifying that the information contained within the document is neither false nor misleading. While not exhaustive, Attachment 1 contains a list of some of the environmental planning instruments, guidelines, policies, and plans that may be relevant to the environmental assessment of this development. In addition to the matters set out in Schedule 1 of the *Environmental Planning and Assessment Regulation 2000*, the development application must be accompanied by a signed report from a suitably qualified expert that includes an accurate estimate of the capital investment value (as defined in Clause 3 of the *Environmental Planning and Assessment Regulation 2000*) of the development, including details of all the assumptions and components from which the capital investment value calculation is derived.
Key issues	The EIS must address the following key issues: · **Water** – including: - a detailed site water balance for the life of the development, including a description of site water demands, water take from any water source, water disposal methods (inclusive of anticipated volumes, quality and frequency of any water discharges), water supply infrastructure and water storage structures as defined by the relevant Water Sharing Plan and in accordance with the *Australian Groundwater Modelling Guidelines* (Commonwealth, 2012*);* - a conceptual groundwater model that assesses the potential groundwater hazards and impacts associated with the development in accordance with the *Australian Groundwater Modelling Guidelines* (Commonwealth, 2012) having regard to the *NSW Aquifer Interference Policy* (2012); - identification of any licensing requirements or other approvals under the

Water Act 1912 and/or the *Water Management Act 2000*;

- demonstration that water required for the construction and operation of the development can be obtained and maintained from an appropriately authorised and reliable supply in accordance with the operating rules of any relevant Water Sharing Plan (WSP);
- a description of the measures proposed to ensure the development can operate in accordance with the requirements of any relevant WSP or water source embargo with consideration to any water supply restrictions or water entitlement limitations;
- an assessment of any likely flooding impacts of the development;
- a detailed assessment of any need to maintain an adequate buffer between excavations and the highest predicted or recorded regional groundwater table;
- an assessment of the likely impacts (including cumulative impacts) on the quality and quantity of existing surface and ground water resources, including a detailed assessment of proposed water discharge quantities and quality against receiving water quality and flow objectives;
- an assessment of the likely impacts (including cumulative impacts) of the development on aquifers, watercourses, riparian land, water-related infrastructure, and other water users. This assessment must include a strategy for managing potential impacts during the life of the development and identify any conservation outcomes;
- an assessment of the potential water quality hazards surrounding the site including acidity, metals, salinity and contaminants including poly-fluoroalkyl substances (PFAS). This assessment must include measures proposed to reduce or manage the hazards and potential interactions on the development and surrounding water users; and
- a detailed description of the proposed water management system (including sewage), surface and ground water monitoring program and other measures to mitigate surface and groundwater impacts;

· **Noise** – including:

- a description of the existing noise environment (including any sensitive receivers and noise assessment groups);
- a detailed assessment of the likely construction and operational noise impacts (including off-site transport noise impacts) of the development having regard to the cumulative impacts of the development in relation to the proposed, approved and existing developments in the vicinity of the site in accordance with the *Interim Construction Noise Guideline*, *NSW Noise Policy for Industry* and the *NSW Road Noise Policy* respectively, and having regard to the *Voluntary Land Acquisition and Mitigation Policy*;

· **Air Quality** – including:

- a description of the existing air quality environment (including any sensitive receivers and air quality assessment groups);
- a detailed assessment of potential construction and operational air quality and odour impacts of the development having regard to the cumulative impacts of the development in relation to the proposed, approved and existing developments in the vicinity of the site, in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW,* and with a particular focus on dust emissions including $PM_{2.5}$ and PM_{10}, and having regard to the *Voluntary Land Acquisition and Mitigation Policy*;

· **Biodiversity** – including:

- accurate predictions of any vegetation to be cleared on site for the purposes of the development;
- a detailed assessment of the likely biodiversity impacts of the development, paying particular attention to threatened species, populations and

ecological communities and groundwater dependent ecosystems, undertaken in accordance with the *Biodiversity Assessment Method* and documented in a Biodiversity Development Assessment Report (BDAR); and
- a strategy to offset any residual impacts of the development in accordance with the offset rules under the *Biodiversity Offsets Scheme*;

· **Heritage** – including:
- an assessment of the potential impacts on Aboriginal heritage (cultural and archaeological), including evidence of appropriate consultation with relevant Aboriginal communities/parties and Heritage NSW and documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage in accordance with the *Code of Practice for Archaeological Investigation in NSW* (OEH 2010); and
- identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items;

· **Traffic & Transport** – including:
- accurate predictions of the road traffic generated by the construction and operation of the development, including a description of the types of vehicles likely to be used for transportation of quarry products;
- a road safety audit;
- detailed assessment of potential traffic impacts on the capacity, condition, safety and efficiency of the local and State road network (as identified above) having regard to the cumulative impacts of the development in relation to the proposed, approved and existing developments in the vicinity of the site in accordance with the *Roads and Maritime Services NSW's Guide to Traffic Generating Developments* (2002). This assessment must include a strategy to manage and/or minimise traffic impacts over the life of the development; and
- a description of the measures that would be implemented to mitigate any impacts;

· **Land Resources** – including a detailed assessment of:
- potential impacts and risks on soils and land capability (including potential interactions with acid sulphate soils, erosion, land contamination and the proposed imported Virgin Extracted Natural Material);
- potential impacts on landforms (topography), paying particular attention to the long term geotechnical stability of any new landforms (such as banks, artificial ponds or bunds etc); and
- the compatibility of the development with other land uses in the vicinity of the development in accordance with the requirements in Clause 12 of *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries)* 2007, paying particular attention to the agricultural land use in the region;

· **Waste –** including estimates of the frequency, quantity and nature of the waste streams that would be generated, handled, stored or received by the development and any measures that would be implemented to minimise, manage or dispose of these waste streams;

· **Hazards –** including an assessment of the likely risks to public safety, paying particular attention to potential bushfire risks and the transport, handling and use of any hazardous or dangerous goods;

· **Visual** – including a detailed assessment of the likely visual impacts of the development (including post mining landforms) on private landowners in the vicinity of the development and key vantage points in the public domain, paying particular attention to any new landforms;

· **Social** – including a detailed assessment of the potential social impacts of the development that builds on the findings of the Social Impact Assessment

	Scoping Report, in accordance with the *Social impact assessment guideline for State significant mining, petroleum production and extractive industry development*. This assessment must consider: - how the development might affect people's way of life, community, access to and use of infrastructure, services and facilities, culture, health and wellbeing, surroundings, personal and property rights, decision-making systems, and fears and aspirations; - the principles in Section 1.3 of the guideline; and - the review questions in Appendix D of the guideline; · **Economic** – including a detailed assessment of the likely economic impacts of the development, paying particular attention to: - the significance of the resource; - the costs and benefits of the project; identifying whether the development as a whole would result in a net benefit to NSW, including consideration of fluctuation in commodity markets and exchange rates; and - the demand on local infrastructure and services; and · **Rehabilitation** – including the proposed rehabilitation strategy for the site having regard to the key principles in the *Strategic Framework for Mine Closure*, including: - rehabilitation objectives, methodology, monitoring programs, performance standards and proposed completion criteria; - nominated final land use, having regard to any relevant strategic land use planning or resource management plans or policies; and - the potential for integrating this strategy with any other rehabilitation and/or offset strategies in the region.
Consultation	During the preparation of the EIS, you must consult with relevant local, State and Commonwealth Government authorities, service providers, Aboriginal stakeholders, community groups and affected landowners. In particular you must: · consult with: - affected landowners; - community groups; - Aboriginal stakeholders; - Community Consultative Committee; - Port Stephens Council; - the Biodiversity Conservation Division within the Department of Planning, Industry and Environment (the Department); - Water Division and the Natural Resources Access Regulator within the Department; - Heritage NSW; - NSW Environment Protection Authority; - Regional NSW – Mining, Exploration & Geoscience Division; - Department of Primary Industries (including Agriculture and Fisheries) within the Department; - Hunter Water Corporation; - NSW Rural Fire Service; and - Transport for NSW. The EIS must: · describe the consultation process used and demonstrate that effective consultation has occurred; · describe the issues raised; · identify where the design of the development has been amended and/or mitigation proposed to address issues raised; and · otherwise demonstrate that issues raised have been appropriately addressed in

	the assessment.
Further consultation after 2 years	If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these requirements, you must consult further with the Planning Secretary in relation to the preparation of the EIS.

ATTACHMENT 1

Environmental Planning Instruments, Policies, Guidelines & Plans

Air	
	Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Developments (DP&E)
	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2016)
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA, 2007)
	Generic Guidance and Optimum Model Settings for the CALPUFF Modelling System for Inclusion into the 'Approved Methods for the Modelling and Assessments of Air Pollutants in NSW, Australia' (EPA, 2011)
	National Greenhouse Accounts Factors (Commonwealth)
Noise	
	Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Developments (DP&E)
	NSW Noise Policy for Industry (EPA, 2017)
	Interim Construction Noise Guideline (DECC, 2009)
	NSW Road Noise Policy (DECW, 2011)
Water	
Groundwater	NSW State Groundwater Policy Framework Document (NOW)
	NSW State Groundwater Quality Protection Policy (NOW)
	NSW State Groundwater Quantity Management Policy (NOW)
	NSW Aquifer Interference Policy (NOW, 2012)
	Office of Water Guidelines for Controlled Activities (2012)
	Groundwater Monitoring and Modelling Plans – Information for prospective mining and petroleum exploration activities (NOW)
	Australian Groundwater Modelling Guidelines (Commonwealth, 2012)
	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)
	Guidelines for the Assessment & Management of Groundwater Contamination (EPA)
Surface Water	NSW Government Water Quality and River Flow Objectives (EPA)
	Using the ANZECC Guideline and Water Quality Objectives in NSW (EPA)
	National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems – Effluent Management (ARMCANZ/ANZECC)
	NSW Water Conservation Strategy (2000)
	State Water Management Outcomes Plan
	NSW State Rivers and Estuary Policy (1993)
	Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (EPA, 2004)
	Managing Urban Stormwater: Soils & Construction (Landcom, 2004) and associated addendum publications including Volume 2E: Mines and Quarries (EPA)
	Managing Urban Stormwater: Treatment Techniques (EPA)
	Managing Urban Stormwater: Source Control (EPA)

	Site Investigations for Urban Salinity (DLWC, 2002)
	Technical Guidelines: Bunding & Spill Management (EPA)
	Environmental Guidelines: Use of Effluent by Irrigation (EPA)
	A Rehabilitation Manual for Australian Streams (LWRRDC and CRCCH)
	NSW Guidelines for Controlled Activities on Waterfront Land (NOW, 2018)
Land	
	Soil and Landscape Issues in Environmental Impact Assessment (DLWC, 2000)
	Agfact AC.25: Agricultural Land Classification (NSW Agriculture)
	Agricultural Issues for Extractive Industries (DPI)
	Acid Sulfate Soils Manual (Stone et al.1998)
	State Environmental Planning Policy No. 55 – Remediation of Land
	Sampling Design Guidelines (EPA, 1995)
	Guidelines for Consultants Reporting on Contaminated Sites (EPA, 2000)
	Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (ANZECC)
	Land Use Conflict Risk Assessment Guide (DPI)
Traffic	
	Guide to Traffic Generating Developments (RMS, 2002)
	EIS Guidelines - Roads and Related Facilities (Department of Urban Affairs and Planning, 1996)
	Guide to Traffic Management - Part 12: Integrated Transport Assessments for Developments (Austroads, 2020)
	Road Design Guide (RMS) & relevant Austroads Standards
Biodiversity	
	Biodiversity Assessment Method (OEH, 2017)
	Fisheries NSW policies and guidelines
	Guidelines for developments adjoining land and water managed by the Department of Environment, Climate Change and Water (DECCW, 2010)
	Guidelines for Threatened Species Assessment (DP&E)
	Surveying threatened plants and their habitats - NSW survey guide for the Biodiversity Assessment Method (DPIE, 2020)
	Guidance and criteria to assist a decision-maker to determine a serious and irreversible impact (OEH, 2017)
	NSW State Groundwater Dependent Ecosystem Policy (NOW)
	Revocation, recategorisation and road adjustment policy (OEH, 2012)
	Risk Assessment Guidelines for Groundwater Dependent Ecosystems (NOW)
	State Environmental Planning Policy (Koala Habitat Protection) 2019
Heritage	
	The Burra Charter 2013 (The Australia ICOMOS charter for places of cultural significance)
	Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH, 2010)
	Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW (DECCW, 2010)
	Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (OEH, 2010)
	Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011)
	NSW Heritage Manual (OEH, 1996)
	Archaeological Assessments Guidelines (Heritage Council, 1996)
	Statements of Heritage Impact (OEH)
Hazards	
	AS1940:2017 –- The storage and handling of flammable and combustible liquids

	Storage and Handling of Dangerous Goods – Code of Practice (WorkCover, 2005)
	State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
	Hazardous and Offensive Development Application Guidelines – Applying SEPP 33
	State Environmental Planning Policy No. 55 (Remediation of Land)
	Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis
	Planning for Bush Fire Protection (RFS, 2019)
	NSW Waste Avoidance and Resource Recovery Strategy 2014 - 2021
Waste	
	Waste Classification Guidelines – 4 Parts (EPA, 2014)
Rehabilitation	
	Mine Rehabilitation – Leading Practice Sustainable Development Program for the Mining Industry (Commonwealth)
	Mine Closure and Completion – Leading Practice Sustainable Development Program for the Mining Industry (Commonwealth)
	Strategic Framework for Mine Closure (ANZMEC-MCA)
Social & Economic	
	Social impact assessment guideline for State significant mining, petroleum production and extractive industry development (DP&E)
Environmental Planning Instruments - General	
	State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007
	State Environmental Planning Policy (State and Regional Development) 2011
	State Environmental Planning Policy (Infrastructure) 2007
	State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
	State Environmental Planning Policy (Coastal Management) 2018
	Port Stephens Local Environmental Plan 2013

ATTACHMENT 2

Agency Correspondence

DOC20/715035-2
SSD-9099356

Colin Phillips

Team Leader
Minerals Quarry Assessments
Department of Planning, Industry and Environment
colin.phillips@planning.nsw.gov.au

Dear Colin

Input into Secretary's Environmental Assessment Requirements – Holcim Salt Ash Sand Operations (SSD-9099356) (Port Stephens)

I refer to your email sent on 1 September 2020 seeking input into the Secretary's Environmental Assessment Requirements (SEARs) for the Holcim Salt Ash Sand Operations proposal located at 8 Oakvale Drive (Lot 4 DP 774726) in Salt Ash. The proposed development is within the Port Stephens local government area.

The Biodiversity Conservation Division (BCD) of the Department of Planning, Industry and Environment (DPIE) understands that Holcim (Australia) Pty Ltd (the proponent) are seeking approval for continued operations at the site. Holcim owns and operates the Salt Ash Sand Operations (the 'site' or the 'quarry'), a long-standing operation that extracts, processes and transports sand products for use in the production of industrial and construction materials, such as glass and concrete. BCD understands that the proposal is a State Significant Development (SSD-9099356) project under the *Environmental Planning and Assessment Act 1979*.

BCD has reviewed the Preliminary Environmental Assessment documents (and appendices) as prepared by Element Environment Pty Ltd (dated 24 August 2020) and has prepared Standard SEARs which are presented in **Attachment A**. There are no project-specific SEARs provided for this project (**Attachment B**). Details of guidance documents are provided in **Attachment C**.

With respect to Aboriginal cultural heritage, BCD is no longer the relevant agency for Aboriginal cultural heritage matters. From 1 July 2020, the regulation of Aboriginal cultural heritage transferred to Heritage NSW. Any enquiries, assessments, requests for comment or matters relating to Aboriginal cultural heritage should now be sent to heritagemailbox@environment.nsw.gov.au.

If you have any further questions in relation to this matter, please contact Steve Lewer, Senior Regional Biodiversity Conservation Officer, on 4927 3158 or at rog.hcc@environment.nsw.gov.au.

Yours sincerely

4 September 2020

STEVEN COX
Senior Team Leader Planning
Hunter Central Coast Branch
Biodiversity and Conservation Division

Enclosure: Attachments A, B, C

Attachment A – Standard Environmental Assessment Requirements

Biodiversity

1. Biodiversity impacts related to the proposed development (SSD-9099356) are to be assessed in accordance with the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the *Biodiversity Conservation Act 2016* (s6.12), *Biodiversity Conservation Regulation 2017* (s6.8) and Biodiversity Assessment Method.
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.
3. The BDAR must include details of the measures proposed to address the offset obligation as follows;
    - The total number and classes of biodiversity credits required to be retired for the development/project;
    - The number and classes of like-for-like biodiversity credits proposed to be retired;
    - The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
    - Any proposal to fund a biodiversity conservation action;
    - Any proposal to conduct ecological rehabilitation (if a mining project);
    - Any proposal to make a payment to the Biodiversity Conservation Fund.

If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.

4. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the *Biodiversity Conservation Act 2016*.

Water and soils

5. The EIS must map the following features relevant to water and soils including:
    a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
    b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).
    c. Wetlands as described in s4.2 of the Biodiversity Assessment Method.
    d. Groundwater.
    e. Groundwater dependent ecosystems.
    f. Proposed intake and discharge locations.

6. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
   a. Existing surface and groundwater.
   b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
   c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
   d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.

7. The EIS must assess the impacts of the development on water quality, including:
   a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.
   b. Identification of proposed monitoring of water quality.

8. The EIS must assess the impact of the development on hydrology, including:
   a. Water balance including quantity, quality and source.
   b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
   c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
   d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
   e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
   f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
   g. Identification of proposed monitoring of hydrological attributes.

Flooding and coastal erosion

9. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
   a. Flood prone land.
   b. Flood planning area, the area below the flood planning level.
   c. Hydraulic categorisation (floodways and flood storage areas).

10. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 1 in 10 year, 1 in 100 year flood levels and the probable maximum flood, or an equivalent extreme event.

11. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:
    a. Current flood behaviour for a range of design events as identified in 11 above. This includes the 1 in 200 and 1 in 500 year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.

12. Modelling in the EIS must consider and document:
    a. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood.
    b. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazards and hydraulic categories.
    c. Relevant provisions of the NSW Floodplain Development Manual 2005.

13. The EIS must assess the impacts on the proposed development on flood behaviour, including:
    a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.
    b. Consistency with Council floodplain risk management plans.
    c. Compatibility with the flood hazard of the land.
    d. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.
    e. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
    f. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.
    g. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the SES and Council.
    h. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the SES and Council.
    i. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the SES.
    j. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

14. The [EIS/EA] must describe the potential effects of coastal processes and hazards (within the meaning of the Coastal Management Act 2016), including sea level rise and climate change: a. On the proposed development b. Arising from the proposed development.
15. The [EIS/EA] must consider have regard to any certified Coastal Management Program (or Coastal Zone Management Plan) and be consistent with the management objectives described in the Coastal Management Act 2016 and development controls for coastal management areas mapped under the State Environmental Planning Policy (Coastal Management) 2018.

Attachment B – Project specific environmental assessment requirements

Biodiversity - nil
Water and soils - nil
Flooding and coastal erosion - nil

Attachment C – Guidance material

Title	Web address
Relevant legislation	
Biodiversity Conservation Act 2016	https://www.legislation.nsw.gov.au/#/view/act/2016/63/full
Coastal Management Act 2016	https://www.legislation.nsw.gov.au/#/view/act/2016/20/full
Commonwealth Environment Protection and Biodiversity Conservation Act 1999	http://www.austlii.edu.au/au/legis/cth/consol_act/epabca1999588/
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
Fisheries Management Act 1994	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+38+1994+cd+0+N
Marine Parks Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+64+1997+cd+0+N
National Parks and Wildlife Act 1974	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+80+1974+cd+0+N
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
Water Management Act 2000	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+92+2000+cd+0+N
Wilderness Act 1987	http://www.legislation.nsw.gov.au/viewtop/inforce/act+196+1987+FIRST+0+N
Biodiversity	
Biodiversity Assessment Method (OEH, 2017)	http://www.environment.nsw.gov.au/resources/bcact/biodiversity-assessment-method-170206.pdf
Guidance and Criteria to assist a decision maker to determine a serious and irreversible impact (OEH, 2017)	http://www.environment.nsw.gov.au/resources/bcact/guidance-decision-makers-determine-serious-irreversible-impact-170204.pdf
Surveying threatened plants and their habitats - NSW survey guide for the Biodiversity Assessment Method (DPIE, 2020) *The revised edition replaces the 2016 (Version 1)	https://www.environment.nsw.gov.au/research-and-publications/publications-search/surveying-threatened-plants-and-their-habitats-survey-guide-for-the-biodiversity-assessment-method
Fisheries NSW policies and guidelines	http://www.dpi.nsw.gov.au/fisheries/habitat/publications/policies,-guidelines-and-manuals/fish-habitat-conservation
List of national parks	http://www.environment.nsw.gov.au/NationalParks/parksearchatoz.aspx
Revocation, recategorisation and road adjustment policy (OEH, 2012)	http://www.environment.nsw.gov.au/policies/RevocationOfLandPolicy.htm
Guidelines for developments adjoining land and water managed by the Department of Environment, Climate Change and Water (DECCW, 2010)	http://www.environment.nsw.gov.au/protectedareas/developmntadjoiningdecc.htm
Acid sulphate soils	
Acid Sulfate Soils Planning Maps via Data.NSW	http://data.nsw.gov.au/data/

Title	Web address
Acid Sulfate Soils Manual (Stone et al. 1998)	http://www.environment.nsw.gov.au/resources/epa/Acid-Sulfate-Manual-1998.pdf
Acid Sulfate Soils Laboratory Methods Guidelines (Ahern et al. 2004)	http://www.environment.nsw.gov.au/resources/soils/acid-sulfate-soils-laboratory-methods-guidelines.pdf This replaces Chapter 4 of the Acid Sulfate Soils Manual above.
Flooding and coastal erosion	
Reforms to coastal erosion management	http://www.environment.nsw.gov.au/coasts/coastalerosionmgmt.htm
Floodplain development manual	http://www.environment.nsw.gov.au/floodplains/manual.htm
Guidelines for Preparing Coastal Zone Management Plans	Guidelines for Preparing Coastal Zone Management Plans http://www.environment.nsw.gov.au/resources/coasts/130224CZMPGuide.pdf
NSW Climate Impact Profile	http://climatechange.environment.nsw.gov.au/
Climate Change Impacts and Risk Management	Climate Change Impacts and Risk Management: A Guide for Business and Government, AGIC Guidelines for Climate Change Adaptation
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	www.environment.gov.au/water/publications/quality/australian-and-new-zealand-guidelines-fresh-marine-water-quality-volume-1
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf

OUT20/10561

Colin Phillips
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

colin.phillips@planning.nsw.gov.au

Dear Mr Phillips

Holcim Salt Ash Sand Operation (SSD 9099356)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

I refer to your email of 1 September 2020 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The following recommendations are provided by DPIE Water and NRAR.

The SEARS should include:

1. The identification of an adequate and secure water supply for each water year of the entire life of the project.
2. Annual volumes of surface water and groundwater proposed to be taken by the activity (including through inflow and seepage) from each surface and groundwater source as defined by the relevant Water Sharing Plan.
3. An annual site water balance for the duration over which the activity proposes to impact the natural water cycle.
4. The development of a thorough groundwater conceptual model with supporting cross section and extraction mining depth supported by field data.
5. Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
6. Proposed surface and groundwater monitoring activities and methodologies.
7. Details of a proposed water management plan.
8. Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water)

For detailed requirements of the above please see **Attachment A**.

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

Yours sincerely

E Rogers

Liz Rogers,
Manager, Assessments
Water – Strategic Relations
30 September 2020

ATTACHMENT A

Holcim Salt Ash Sand Operation (SSD 9099356)
SEARs Detailed Requirements

1. **The identification of an adequate and secure water supply for each water year of the entire life of the project.**

This should include:

- Identification of any licensing requirements or other approvals required under the *Water Act 1912* and/or *Water Management Act 2000.*
- Confirmation that the required entitlements can be obtained prior to development approval from an appropriately authorised and reliable supply in accordance with the operating rules of any relevant Water Sharing Plan.
- An assessment of the current market depth where water entitlement is required to be purchased.

2. **Annual volumes of surface water and groundwater proposed to be taken by the activity (including through inflow and seepage) from each surface and groundwater source as defined by the relevant Water Sharing Plan.**

No further explanation required.

3. **An annual site water balance for the duration over which the activity proposes to impact the natural water cycle.**

This should include:

- All input and output volumes of each potentially connected surface water and groundwater source.
- Identification of each of the activity's water requirements and all proposed volumetric take (direct and indirect) from each water source.
- Cumulative volumetric take by neighbouring users.
- Complex three-dimensional numerical modelling as per the Australian Groundwater Modelling Guidelines (2012), with evidence-based conceptual modelling and testing (cf. Enemark et al. 2019), calibration, and numerical model uncertainty analysis (Middlemis & Peeters 2018).

4. **The development of a thorough groundwater conceptual model with supporting cross section and extraction mining depth supported by field data.**

This should include:

- A full description of hydrogeological settings, formation characteristics, baseline groundwater flow and groundwater quality, supporting environmental values. Description to be supported by maps and cross sections.
- An assessment of all potential hazards and consequences and processes associated with those impacts.

5. **Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.**

This should:

- Be based on data that is demonstrated to be of adequate type, quality and quantity.

- Be informed by complex numerical hydrogeological modelling parameterised with suitably distributed and accurate site measurements, collected in accordance with relevant and current national or international standards.
- Include a geochemical impact assessment (static and kinetic testing of acid-base accounting and element mobility) of the stockton sandbeds, and any bounding geological units, in accordance with AMIRA (2002), Inap (2009); Dear et al. 2014, Duap 1996, Shand et al. 2018, Simpson et al. 2018, and Tulau 2007.
- Modelled transportation of water-quality hazards (acidity, metals, nutrients, salinity, pathogens, site-used dangerous substances, pfas) toward the site, third-party registered groundwater users, and environmental assets.
- If forecasting any impact on water salinity, provide a salinity budget based on the numerical groundwater model.
- Identify and apply appropriate local community values and water-quality objectives as per Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG).

6. Proposed surface and groundwater monitoring activities and methodologies.

No further explanation required.

7. Details of a proposed water management plan.

This should include:

- An appropriate data-quality assurance plan:
  - for water levels – see WMSTC (2019)
  - for water quality – see US EPA (2006) and Mueller (2015)
  - for other measurements – apply the most applicable industry standard available.
- Stakeholder consultation to define the community value (beneficial use category) of each water source as per ANZG (2018).
- Establishment and updating of baseline status as per ANZG (2018), with estimated uncertainty, and with respect to community values and identified risks, including:
  - water take
  - groundwater levels and circulation paths and rates
  - transportation of salinity, pathogens, dangerous substances, pfas
  - turbidity
  - oxidation state (redox, dissolved oxygen), acidity generation and release of metals, metalloids, nutrients
- Specification of water-quality target values, action-trigger parameters, water-quality assessment approach, and response strategy for the early positive detection of change, trends or other signatures relating to ecosystem condition and community value; to be established in accordance with ANZG (2018).
- Mitigation and management strategy. For acid sulphate soils refer to:
  - Dear et al. 2014,
  - DUAP 1996,
  - Shand et al. 2018,
  - Simpson et al. 2018,
  - Stone et al. 1998, and;
  - Tulau 2007.

8. Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water)

No further explanation required.

References

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- ANZG 2018. Australian and New Zealand Guidelines for Fresh and Marine Water Quality. Australian and New Zealand governments and Australian state and territory governments, Canberra. < www. waterquality.gov.au/anz-guidelines >. Guidelines for Water Quality Management, available < https://www.waterquality.gov.au/guidelines >.
- Barnett B, Townley LR, Post V, Evans RE, Hunt RJ, Peeters L, Richardson S, Werner, AD, Knapton A and Boronkay A. Australian Groundwater Modelling Guidelines, June 2012. < http://www.groundwater.com.au/media/W1siZiIsIjIwMTIvMTAvMTcvMjFfNDFfMzZfOTYwX0F1c3RyYWxpYW5fZ3JvdW5kd2F0ZXJfbW9kZWxsaW5nX2d1aWRlbGluZXMucGRmIl1d/Australian-groundwater-modelling-guidelines.pdf >.
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- DUAP (NSW Department of Urban Affairs and Planning) 1996. Extractive industries dredging and other extraction in riparian and coastal areas: EIS Guideline. Pubs No 96/57. < https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/extractive-industries-dredging-and-other-extraction-in-riparian-and-coastal-areas-eis-guideline-1996-10.pdf?la=en >.
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- Shand, P, Appleyard, S, Simpson, SL, Degens, B 2018, National Acid Sulfate Soils Guidance: Guidance for the dewartering of acid sulfate soils in shallow groundwater environments, Department of Agriculture and Water Resources, Canberra, ACT. CC BY 4.0. < https://www.waterquality.gov.au/sites/default/files/documents/dewatering-acid-sulfate-soils.pdf >.
- Simpson, SL, Mosley, L, Batley, GE and Shand, P (2018). National acid sulfate soils guidance: guidelines for the dredging of acid sulfate soil sediments and associated dredge spoil management, Department of Agriculture and Water Resources, Canberra, ACT. CC BY 4.0. < https://www.waterquality.gov.au/sites/default/files/documents/dredging-sediments-spoil.pdf >.

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- Tulau, M.J. (2007). Acid Sulfate Soils Remediation Guidelines for Coastal Floodplains in New South Wales. Department of Environment and Climate Change. < https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Coasts/acid-sulfate-soils-remediation-guidelines-coastal-floodplains-070321.pdf >.
- United States Environmental Protection Agency (US EPA) Guidance on Systematic Planning Using the Data Quality Objectives Process (EPA QA/G-4: EPA/240/B-06/001), February 2006. < https://www.epa.gov/sites/production/files/2015-06/documents/g4-final.pdf >.
- Water Monitoring Standardisation Technical Committee (WMSTC; 2019). National industry guidelines for hydrometric monitoring. Part 2: Site establishment and operations. NI GL 100.02-2019. Commonwealth of Australian (Bureau of Meteorology). < http://www.bom.gov.au/water/standards/documents/NI_GL_100_02-2019.pdf >.

Email From: Alan Bawden
Sent: Tuesday, 13 October 2020 4:18 PM
Subject: RE: Request for Input to Secretary's Environmental Assessment Requirements for Sand Quarry Proposal in Port Stephens LGA

Good afternoon

The NSW RFS has received and reviewed the scoping report for this Designated Development proposal. The site adjoins un-managed vegetation that is mapped bush fire prone land by Council. As such, the EIS shall address the requirements of Planning for Bush Fire Protection 2019. Specifically, the EIS should address the risk to fixed and mobile plant, including any hazardous materials.

Regards

Alan Bawden
Acting Manager
Planning and Environment Services (North)
NSW RURAL FIRE SERVICE
51 Moonee Street Coffs Harbour
Locked Bag 17 GRANVILLE NSW 2142
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PREPARE.ACT.SURVIVE

DOC20/712395-4

Department of Planning, Industry and Environment
Returned via Planning Portal

Attention: Collin Phillips

11 September 2020

Dear Mr Phillips

Secretary's Environmental Assessment Requirements
Holcim Salt Ash Sand Operations (SSD-9099356)

I refer to your email from the Department of Planning, Industry and Environment to the Environment Protection Authority (EPA) dated 1 September 2020 seeking the EPA's Secretary's Environmental Assessment Requirements (SEARs) to assist with the preparation of an Environmental Assessment for the operation of Holcim Salt Ash Sand Operations (SSD-9099356) at 8 Oakvale Drive Salt Ash.

Based on the information provided, the EPA understands that the Proponent is seeking approval for extraction and processing of up to 550,000 tonnes per annum of sand using dry extraction and dredging techniques as the importation of up to 200,000 tpa of sand. By virtue of Clause 19 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act).

The EPA has considered the proposal and provides at **Attachment A** the information it requires to properly assess the Proposal. The EPA's key information requirements for the Proposal must include an adequate description and assessment of:

1. Impacts on water quality and site wide water management;
2. Water and waste management and disposal; and
3. Impacts on air quality.

The EPA has also provided the appropriate guidance material to be considered (but not limited too) at **Attachment B**.

It is important that all assumptions and conclusions made in the environmental assessment are supported by adequate data. The proponent should also be aware that any commitments made in the environmental assessment may be formalised as approval conditions and/or environment protection licence conditions.

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If you have any questions about this matter, please contact Jenny Lange on 02 4908 6891 or by email to hunter.region@epa.nsw.gov.au.

Yours sincerely

JOCK DUNCAN
A/Unit Head
Regulatory Operations Regional North

Encl: **Attachment A** – EPA's Recommended Secretary's Environmental Assessment Requirements
Attachment B – Guidance Material

ATTACHMENT A – EPA's Recommended Secretary's Environmental Assessment Requirements – Holcim Salt Ash Sand Operations (SSD-9099356)

How to use these requirements

The EPA requirements have been structured in accordance with relevant guidelines, as follows. It is suggested that the EIS follow the same structure:

A. Executive summary

B. The proposal

C. The location

D. List of required approvals and licences

E. Identification and prioritisation of all issues

F. The environmental issues

G. The mitigation measures

H. Justification for the proposal and conclusion

The EIS should address the specific requirements outlined under each heading below and assess impacts in accordance with the relevant guidelines/standards at **Attachment B**.

A Executive summary

The document's executive summary should include a discussion of the proposed development, the key environmental risks, the identified mitigation measures, and an overall conclusion and justification for the proposal.

B The proposal

The proposed development must be adequately described and should clearly state and refer to:

a) the type, the nature and size of the proposed development, including proposed average and maximum annual production rates that are expected to occur;

b) the type, the nature and amount of the processes and the products to be used, including the plant and equipment proposed for use, fuel and chemicals required and proposed methods for their transportation, storage, use and their emergency management provisions, including relevant process flow diagrams;

c) the by-products produced and/or wastes produced, including the fate of such products;

d) the staging and timing of the proposal, including any construction works and any plans for potential future expansion plans and the proposed construction and operational hours, including and heavy vehicle movements;

e) the anticipated benefits to relevant industry, community, etc; and

f) the proposal's relationship to any other facility or industry both locally and abroad.

C The location

Provide an overview of the setting in which the proposed development is to take place in its local and regional environmental context including:

a) the location of the proposed facility, its layout, including plant and equipment, and details of the surrounding environment, including land use zoning with appropriate maps/diagrams;

b) the topography;

c) meteorological data (e.g. temperature, wind (prevailing wind direction and strength), rainfall, evaporation, etc);

d) surrounding land uses, including ownership details of any residence and/or land likely to be affected by the proposed facility with appropriate maps/diagrams;

e) ecological information (vegetation, fauna, waters) with appropriate maps/diagrams; and

f) availability of services and the accessibility of the site for passenger and freight transport.

D List of approvals and licences

Identify all approvals, licences or permits required to undertake the proposed development as well as those already obtained and those to be obtained.

Based on the information provided and should the proposed development be approved; the proponent may need to make a separate application to EPA to vary environment protection licence 11685 for the Holcim Salt Ash Sand Operations (SSD-9099356). Additional information is available through EPA's *Guide to Licensing* document. General information on license requirements can also be obtained from EPA's Environment Line on 131 555 during office hours or can be found on the EPA web site (click here).

E Identification and prioritisation of issues / scoping of impact assessment

Identify a scoping risk assessment methodology, undertake a risk assessment, and identify and prioritise key issues.

F The environmental issues

1. Noise

- Identify the existing noise environment (including any relevant noise assessment groupings) and identify applicable noise goals in line with relevant guidance/standards;
- Identify potential noise and vibration sources and impacts during both construction and operational stages and identify best practice mitigation measures (pollution control) and strategies to be incorporated for both stages to minimise noise and vibration emissions/impacts (with proposed timing), including validation monitoring, in line with relevant guidance/standards; and
- Propose representative noise monitoring locations for determining compliance with applicable noise goals and where relevant noise goals would be set as representative limits.

Note: this will require a detailed Noise Impact Assessment to be completed.

2. Air

- Identify the existing air quality environment and identify applicable air quality goals (i.e. ground level concentrations for pollutants and odour assessment criteria) in line with relevant guidance/standards; and
- Identify potential air quality and odour sources and impacts (including point source emissions from any site-based plant and equipment and/or fugitive dust or other emissions) during both construction and operational stages and identify best practice mitigation measures (pollution control) and strategies to minimise point and/or fugitive and/or odour emissions/impacts (with proposed timing), including monitoring, in line with relevant guidance/standards; and
- Include an emission inventory of all sources of air emissions.

Note: this will require a detailed Air Quality Impact Assessment to be completed.

3. Water

- Identify the condition of the local catchment and those immediate areas on and around the proposed development e.g. soils, erosion potential, vegetation cover, etc; and
- Identify nearby water resources, the background water conditions (including river flow data, water flow/direction and quality data, the depth to groundwater, groundwater flow/gradient and quality data, reliance on water resources by surrounding users and by the environment) and relevant water quality objectives in line with relevant guidance/standards; and
- Identify existing impacts to water resources (including other industrial discharges); and
- Identify any water intakes, intake frequency and volumes related to the proposed development; and
- Identify any expected discharges (including stormwater), discharge quality, discharge frequency and volumes related to the proposed development; and
- Identify all practical measures that can be taken to prevent any expected discharges or an explanation of why any specific discharges cannot be prevented; and
- Identify potential impacts to surface and groundwater during both construction and operational stages and identify best practice mitigation measures (pollution control) and strategies to protect surface and groundwater resources, particularly erosion and sediment controls during the construction stage and the rehabilitation stage and the inclusion of permanent erosion and sediment controls where required and applicable; and
- Include a detailed water balance and discharge inventory; and
- Include an assessment of any mixing zones; and

- Include any proposed discharge limits.

Note: this will require a detailed Water Assessment to be completed.

4. Land

- Identify if the soils in the area of the Proposal are contaminated or are acid forming (i.e. acid sulphate soils) and if so, identify best practice mitigation measures (pollution control) and strategies or remedial and/or disposal actions that will be required/undertaken if applicable in accordance with relevant guidance/standards; and
- Identify potential impacts to soils/land resources as a result of the proposed development and identify best practice mitigation measures (pollution control) and strategies that will be required/undertaken if applicable in accordance with relevant guidance/standards.

5. Waste

- Identify all waste types that will be generated as a result of the proposed development during both construction and operation, their classification and the ways in which they will be legally handled, stored, transported, reused, recycled or disposed of, including sampling/monitoring, record keeping, waste tracking, contingency measures and any other verification practices, in accordance with relevant guidance/standards; and
- Identify options and strategies for waste minimisation; reuse and recycling across all activities and processes during both construction and operational stages.

6. Storage and use of fuels / chemicals etc

- Identify all fuels/chemicals/products/dangerous goods to be stored/used onsite; and
- Identify adequate handling, storage, control and usage requirements for any fuels/chemicals/products/dangerous to be stored/used onsite.

7. Incident Management

Identify adequate incident management procedures to be established including notification requirements to the Appropriate Regulatory Authority and other relevant authorities for incidents that cause or have the potential to cause material harm to the environment (Part 5.7 of the POEO Act).

8. Cumulative impacts

- Identify the extent that the receiving environment is already stressed by existing development and background levels of emissions to which this proposal will contribute; and
- Identify the cumulative impacts of the proposed development in a local context.

9. Monitoring Programs

Include a detailed proposal of any noise, air, water, land, waste, meteorological etc monitoring during construction and operation to ensure and assumptions, predictions, goals, criteria etc are achieved. The proposal should include a detailed description of the monitoring locations, sample analysis methods and the level of reporting proposed.

G. Compilation of mitigation measures

- Outline how the proposal and its environmental protection measures would be implemented and managed in an integrated manner so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).
- Include any Statement of Commitments to be made by the Proponent.

H. Justification for the proposed development and conclusion

Reasons should be included which justify undertaking the proposal in the manner proposed, having regard to the potential environmental impacts.

ATTACHMENT B – EPA's Guidance Material (not exhaustive)

Legislation	
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
Protection of the Environment Operations (Noise Control) Regulation 2017	https://legislation.nsw.gov.au/#/view/regulation/2017/449
Protection of the Environment Operations (Clean Air) Regulation 2010	https://legislation.nsw.gov.au/#/view/regulation/2010/428
Protection of the Environment Operations (Waste) Regulation 2014	https://legislation.nsw.gov.au/#/view/regulation/2014/666
Waste Avoidance and Resource Recovery Act 2001	https://legislation.nsw.gov.au/#/view/act/2001/58
Contaminated Land Management Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/140
Licensing	
Licensing Requirements	https://www.epa.nsw.gov.au/licensing-and-regulation/licensing
Noise/Vibration	
Interim Construction Noise Guideline (DECC, 2009)	https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline
Assessing Vibration: a technical guideline (DEC, 2006)	https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration
Noise Policy for Industry (2017) and Implementation and Transitional arrangements for the Noise Policy for Industry (2017)	https://www.epa.nsw.gov.au/publications/noise/17p0524-noise-policy-for-industry https://www.epa.nsw.gov.au/publications/noise/17p0293-implement-transition-arrange-noise-pol-industry
NSW Road Noise Policy (DECCW, 2011)	http://www.epa.nsw.gov.au/resources/noise/2011236nswroadnoisepolicy.pdf
Air/Odour	
Approved methods for the Modelling and Assessment of Air Pollutants in NSW (2016)	http://www.epa.nsw.gov.au/resources/epa/approved-methods-for-modelling-and-assessment-of-air-pollutants-in-NSW-160666.pdf
Approved methods for the Sampling and Analysis of Air Pollutants in NSW (2007)	http://www.epa.nsw.gov.au/resources/air/07001amsaap.pdf
National Environment Protection (Ambient Air Quality) Measure	http://www.nepc.gov.au/nepms/ambient-air-quality
No EPA specific guidance material exists for the control of dust from construction sites. Consideration should be given to the POEO Act and the Local Government Air Quality Toolkit (DECC, 2007)	http://www.epa.nsw.gov.au/air/lgaqt.htm
Technical Framework - Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006) and Technical Notes - Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006)	http://www.epa.nsw.gov.au/air/odour.htm http://www.epa.nsw.gov.au/air/odour.htm

Water/Soils	
ANZECC Guidelines for Fresh and Marine Water Quality (2018)	https://www.waterquality.gov.au/guidelines/anz-fresh-marine
NSW Water Quality and River Flow Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/water/approvedmethods-water.pdf
Soil and Landscape Issues in Environmental Impact Assessment (DLWC 2000)	https://www.researchgate.net/profile/Jonathan_Gray8/publication/277013352_Soil_and_Landscape_Issues_in_Environmental_Impact_Assessment/links/555e813e08ae8c0cab2c7690/Soil-and-Landscape-Issues-in-Environmental-Impact-Assessment.pdf
Managing urban stormwater: soils and construction, vol. 1 (Landcom, 2004) and Addendum Publications (Various)	http://www.environment.nsw.gov.au/stormwater/publications.htm
Landslide Risk Management (2007)	http://www.australiangeomechanics.org/resources/downloads/
Site Investigations for Urban Salinity (DLWC, 2002)	http://www.environment.nsw.gov.au/resources/salinity/booklet3siteinvestigationsforurbansalinity.pdf
Dryland Salinity Resources (Various)	http://www.environment.nsw.gov.au/salinity/solutions/urban.htm
Contaminated Sites Assessment and Remediation	
Contaminated Land – EPA website	https://www.epa.nsw.gov.au/your-environment/contaminated-land
Managing land contamination: Planning Guidelines – SEPP 55 Remediation of Land	http://www.epa.nsw.gov.au/clm/planning.htm
Guidelines for the NSW Site Auditor Scheme – 3rd Edition (EPA, 2017)	https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-for-the-nsw-site-auditor-scheme-third-edition
Guidelines for Consultants Reporting on Contaminated Sites (EPA, 2000)	http://www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf
Sampling Design Guidelines (EPA, 1995)	http://www.epa.nsw.gov.au/resources/clm/95059sampgdlne.pdf
National Environment Protection (Assessment of Site Contamination) Measure	http://www.nepc.gov.au/nepms/assessment-site-contamination
Waste	
NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Waste Classification Guidelines – 4 Parts (EPA, 2014)	http://www.epa.nsw.gov.au/wasteregulation/classify-waste.htm
Chemical and Fuel Storage	
Storage and Handling of Dangerous Goods – Code of Practice (WorkCover, 2005)	http://www.safework.nsw.gov.au/__data/assets/pdf_file/0005/50729/storage-handling-dangerous-goods-1354.pdf

Our reference: DOC20/711404
Date: 11 September 2020

HERITAGE NSW – Aboriginal Cultural Heritage - SEARs

Project Name: Holcim Salt Ash Operations, Port Stephens Local Government Area
SSD: 9099356

1. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigation in NSW (OEH 2010), and be guided by the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (DECCW 2011) and consultation with Heritage NSW..
2. Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.
3. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to Heritage NSW.
4. The assessment of Aboriginal cultural heritage values must include a surface survey undertaken by a qualified archaeologist. The result of the surface survey is to inform the need for targeted test excavation to better assess the integrity, extent, distribution, nature and overall significance of the archaeological record. The results of surface surveys and test excavations are to be documented in the ACHAR.
5. The ACHAR must outline procedures to be followed if Aboriginal objects are found at any stage of the life of the project to formulate appropriate measures to manage unforeseen impacts.
6. The ACHAR must outline procedures to be followed in the event Aboriginal burials or skeletal material is uncovered during construction to formulate appropriate measures to manage the impacts to this material.

NOTE: The process described in the *Due Diligence Code of Practice for the protection of Aboriginal objects in NSW* (DECCW 2010) is not sufficient to assess the impacts on Aboriginal cultural heritage of Major Projects.

Level 6, 10 Valentine Ave Parramatta NSW 2150 ■ Locked Bag 5020 Parramatta NSW 2124
P: 02 9873 8500 ■ E: heritagemailbox@environment.nsw.gov.au

Hunter Water Corporation
ABN 46 228 513 446

PO Box 5171
HRMC NSW 2310
36 Honeysuckle Drive
NEWCASTLE NSW 2300
hunterwater.com.au
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enquiries@hunterwater.com.au

15 September 2020

Our Ref: HW2020-1025

Energy & Resource Assessments
Department of Planning, Industry and Environment
23-33 Bridge Street
Sydney NSW 2000

Attention: Colin Phillips
Via email: colin.phillips@planning.nsw.gov.au

Dear Colin,

RE: REQUEST FOR INPUT – SEARs – HOLCIM SALT ASH SAND OPERATIONS (SSD- 9099356) – 8 OAKVALE DRIVE, SALT ASH

Thank you for the invitation to provide input to the Secretary's Environmental Assessment Requirements for the expansion of sand extraction operations at Lot 4 DP 774726, 8 Oakvale Drive, Salt Ash. Hunter Water understands the proposal involves the extraction of up to 550,000 tonnes of sand from the site per year via dry and wet (dredging) extraction methods to a depth of between -12 m AHD and -35 m AHD. The proposal also includes the processing of sand extracted from this site and an additional 200,000 tonnes per annum of material from Holcim's operations in Tanilba and Anna Bay and from the Cabbage Tree Road sand quarry.

The quarry is located adjacent to the North Stockton Catchment Area gazetted under the *Hunter Water Regulation 2015*. While the proposal is located outside of the gazetted catchment area, catchment area boundaries typically follow convenient landscape or cadastral features. As such, the site is located within the landscape unit that comprises the water source and activities at the site may still affect groundwater in the catchment area. While groundwater is not currently extracted from the North Stockton aquifer by Hunter Water for potable water supply, Hunter Water maintains an interest in protecting the water source and ensuring it is not adversely affected by inappropriate development. This includes ensuring that all activities are undertaken in a manner consistent with current best management practice.

Hunter Water's key concerns that require addressing in the Environmental Assessment are impacts on groundwater and surface water quality and quantity, site management and rehabilitation, and pollution risk/spill management. These are described below.

Groundwater

The site is located on an aquifer that is contiguous with the North Stockton catchment area so activities that have an impact on the aquifer at the site will also have some effect on the aquifer in the catchment area. Hunter Water supports best practice management of sand extraction operations within and proximal to catchment areas to ensure the groundwater sources are protected and to facilitate sustainable future land use.

The proposal to extract sand below the water table to a depth of -12 m AHD, and potentially to a maximum depth of -35 m AHD, is inconsistent with current best practice

land use and the approved activities of other sand extraction operations in the area. Best practice for existing operations is considered to be extraction to a depth of no more than 0.7 metres above the predicted maximum groundwater level, with the final landform to be at least 1 metre above the predicted maximum groundwater level (with the 0.3 metres difference being an allowance for the stripping and replacement of topsoil to facilitate site rehabilitation), in order to protect the groundwater source and ensure a sustainable future land use. Extraction activities at the Tanilba Northern Dune operations, the Cabbage Tree Road Quarry (SSD-6125), Salt Ash Sand Quarry (07_0094), the Fullerton Cove Sand Quarry (07_0145), and the current operation all have extraction depth limits imposed upon them to safeguard groundwater sources. Measures to protect groundwater sources are related to both pollution risk and the loss of valuable water supplies through drainage and evaporation. In addition to protecting the groundwater source, these measures allow for the establishment of subsequent land uses with similar protection of the groundwater source.

The Environmental Assessment must clearly demonstrate why an excavation depth contrary to current best practice is justified for this particular sand resource. It must also demonstrate that excavation to such a depth would not adversely affect the quality, quantity or flows of groundwater in the aquifer. This should include an assessment of the water balance for the proposed operation and an assessment of cumulative impacts of the proposed operation and other current and likely future sand extraction activities in the aquifer.

The groundwater assessment should determine the effect of the proposed operation on the quality of groundwater in the aquifer, including the possible oxidation of acid sulfate soils, metals, and any contaminants potentially introduced by the dredging activities, as well as effects on potential future uses of the groundwater. The assessment should be informed by baseline groundwater monitoring to establish pre-development groundwater quality conditions and depth monitoring to assist in establishing the predicted maximum groundwater levels across the site, taking into consideration relevant factors such as climate change forecasts and possible increases in groundwater levels associated with additional vegetation clearing on the site.

Further, a Groundwater Management Plan should be included, which describes the proposed monitoring and management procedures to be implemented to protect the groundwater source. The plan should specify maximum extraction depths and controls to ensure these levels are adhered to. Event-based monitoring (with event triggers to be determined from existing data and consultation during preparation of the plan) and routine monitoring should be included to enable any impacts as a result of operations at the site to be determined.

Surface Water

The site is located on an unconfined sand aquifer that has high infiltration rates and is contiguous with the catchment area. The risk of contaminating the aquifer and the catchment area from potentially polluting activities is therefore high.

The Environmental Assessment should clearly describe surface water management practices for the site, demonstrating how the proposed development will meet the Neutral or Beneficial Effect (NorBE) test for any water discharged from the site into the catchment area as a result of the activities undertaken at the site.

Site Management and Rehabilitation

We note the proposal to import Virgin Excavated Natural Material (VENM) to the site to assist with bank stabilisation and ground stability. An engineered approach to bank stabilisation and ground stability is not considered to be current best practice and also

introduces the potential risk of aquifer and soil contamination. The Environmental Assessment should clearly describe the proposed management of risks associated with imported fill materials, including the justification for their use at the site, anticipated volumes and how and where these materials are anticipated to be used.

The options for site rehabilitation and final land use should be clearly described and assessed in the Environmental Assessment. This should include environmental, social and economic impacts of each option. A rehabilitation plan should be included to describe how the impacts of the operations on groundwater and land use will be managed as the development progresses and after the completion of extractive operations. The plan should include a description of the methods to be used to rehabilitate the site and any ongoing monitoring that will be required.

Pollution Risk and Spill Management

The Environmental Assessment should clearly describe the management of potential contaminants on site, including:

- Wastewater disposal (process water and sewage) management;
- Chemical use and storage, including fuels, refuelling and machinery maintenance procedures;
- Spill emergency procedures; and
- Monitoring and management practices.

The storage and management of fuels and other chemicals used on site will need to comply with all relevant standards and be undertaken in a way that protects the aquifer from the risk of contamination. Spills of any such materials should be cleaned up immediately and disposed of at an appropriately licenced facility. The management of these materials should be documented in an operational Environmental Management Plan, which should include a spill management procedure (including remedial action to be implemented in the event of a spill incident).

In particular, we note the use of diesel powered machinery at the site and the intention to utilise a diesel powered dredge. The risk of aquifer contamination from diesel and other chemical spills at the proposed operation would be higher than for the current operation as a result of exposure to an open water source and is considered to be very high. The Environmental Assessment should clearly describe how these and any other potentially polluting materials would be managed to prevent the pollution of soils, the aquifer and the catchment area.

The importation of fill materials to the site is considered to pose a contamination risk based on experience at several nearby sites in recent years. If such importation is permitted, strict controls should be implemented and enforced to ensure the materials are not contaminated. The Environmental Assessment should clearly describe how these materials would be managed to prevent site contamination.

If you require further advice or clarification regarding this submission, please contact me on (02) 4979 9545.

Yours sincerely

Malcolm Withers
Account Manager Major Development

Regional NSW

Our ref: DOC20/723444

Your ref: SSD-9099356

Colin Phillips

Team Leader

Mineral Quarry Assessments

Dept of Planning, Industry and Environment

4 Parramatta Square

Parramatta NSW 2124

Emailed: via planning portal

14 September 2020

Dear Mr Phillips

Subject: Holcim Salt Ash Sand Operations (SSD-9099356) – Advice on SEARs.

Thank you for the opportunity to provide advice on the above matter. This is a response from the NSW Department of Regional NSW – Mining, Exploration & Geoscience (MEG).

Sand is not a prescribed mineral under the Mining Act 1992. Therefore, MEG has no statutory role in authorising or regulating the extraction of this commodity. However, MEG is the principal government authority responsible for assessing the State's resources of construction materials and for advising state and local government on their planning and management.

MEG has reviewed the Scoping Report for the project and notes that Holcim are currently conducting resource investigations to a maximum depth of -35 m AHD, which may in turn form the maximum depth of extraction. MEG requests the results are outlined within the EIS so that the resource assessment should:

- Document the size and quality of the resource and demonstrate that both have been adequately assessed; and
- Document the methods used to assess the resource and its suitability for the intended applications.

If deemed commercial-in-confidence, the resource assessment summary included in the EIS should commit to providing MEG with full resource assessment documentation separately.

MEG collects data on the quantity of construction materials produced annually throughout the state. Forms are sent to all operating quarries at the end of each financial year for this purpose. The statistical data collected is of great value to Government and industry in planning and resource management, particularly as a basis for analysing trends in production and for estimating future demand for particular commodities or in particular regions. Production data may be published in aggregated form, however production data for individual operations is kept strictly confidential. In order to assist in the collection of construction material production data, the proponent should be required to provide annual production data for the subject site to MEG as a condition of any new or amended development consent.

MEG would appreciate the opportunity for early consultation in relation to the proposed location of any biodiversity offset areas (both on and off site) or any supplementary biodiversity measures to ensure there is no consequent reduction in access to prospective land for mineral exploration, or potential for sterilisation of mineral or extractive resources.

Queries regarding the above information should be directed to the GSNSW - Land Use team at landuse.minerals@geoscience.nsw.gov.au.

Yours sincerely,

Steven Palmer

Manager, Land Use Assessment

Geological Survey of NSW – Mining, Exploration & Geoscience.

Attention: Department of Planning, Industry & Environment

DA NO: **25-2020-5-1**

PROPOSAL: **Holcim Salt Ash Sand Operations (SSD 9099356)**

PROPERTY: **8 Oakvale Drive SALT ASH 2318 - LOT: 4 DP: 774726**

Dear Colin,

Thank you for the opportunity to provide comment on the SEARS request for the Holcim Salt Ash Sand Operations Proposal. Council has completed a review of the Proposal and provides the following advice:

Voluntary Planning Agreement

In terms of contributions, Council's current local infrastructure contributions plan will apply to the Proposal. The only local haulage route will be Oakvale Drive, which currently has contributions applied to it from the current sand mine and others in the vicinity.

Council notes in the Proposal that the development would include sand being transported from surrounding sand mines owned by Holcim (Tanilba Bay and Anna Bay) to the site. The applicant will need to refer to the consents of these surrounding sand mines to ensure that they capture Oakvale Drive as a haulage route. If not, Council would require that contributions be sought for the laden incoming trucks as well as outgoing.

Council would be willing to negotiate on a planning agreement for local infrastructure related to delivering improved social and community outcomes in addition to haulage contributions.

Ecology and Environment

Council reviewed the Scoping Report for the Holcim Salt Ash Sand Operations prepared by Element Environment Pty Ltd, dated 24 August 2020. Council is satisfied that key environmental factors (Acid Sulfate Soils, groundwater, indirect impacts on GDEs, proximity to PFAS area, proximity to Hunter Water Special Areas) have been considered in the study and will be addressed in the EIS.

Yours Sincerely

Ryan Falkenmire
Principal Development Planner

Phone: 4988 0562
Email: ryan.falkenmire@portstephens.nsw.gov.au

CR2020/004497
SF2020/168019
DSN

14 September 2020

Department of Planning, Industry & Environment
Energy and Resource Assessments
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Colin Phillips

SEARS REQUEST – SSD-9099356 – HOLCIM SALT ASH SAND OPERATIONS, 8 OAKVALE DRIVE SALT ASH (LOT: 4 DPI: 774726)

Transport for NSW (TfNSW) advises that legislation to dissolve Roads and Maritime Services and transfer its assets, rights and liabilities to TfNSW came into effect on 1 December 2019. It is intended that the new structure will enable TfNSW to deliver more integrated transport services across modes and better outcomes to customers and communities across NSW.

For convenience, correspondence, advice or submissions made to or by Roads and Maritime Services prior to its dissolution, are referred to in this letter as having been made to or by 'TfNSW'.

On 1 September 2020 TfNSW accepted the referral by the Department of Planning, Industry and Environment (DPIE) through the Planning Portal regarding the abovementioned application. DPIE referred the application to TfNSW for comment. This letter is a submission in response to that referral.

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

TfNSW have reviewed the Scoping Report prepared by Element Environment Pty Ltd dated 24 August 2020. It is understood that Holcim (Australia) Pty Ltd is seeking approval for continued operations at the Salt Ash Sand Operations (the site) through a State Significant Development (SSD).

TfNSW understands the proposal is to extract and process an estimated minimum of 4 million tonnes of sand from the site at a rate of up to 550,000 tonnes per annum (tpa). The proposal also includes import of up to 200,000 tpa of sand from the Anna Bay, Tanilba Bay, Cabbage Tree Road quarry operations. It is proposed that a total of up to 750,000 tonnes of sand products will be processed and dispatched from the site per year. Furthermore, it is understood that importation of

Virgin Excavated Natural Material (VENM) will be required by road on a need-basis to aid in bank stabilisation and ground stability.

TfNSW response & requirements

TfNSW recommends that the Environmental Impact Statement (EIS) should refer to the following guidelines with regard to the traffic and transport impacts of the proposed development:

- Road and Related Facilities within the Department of Planning EIS Guidelines, and,
- Section 2 Traffic Impact Studies of Roads and Maritime's NSW's *Guide to Traffic Generating Developments 2002*, and,
- Austroads Guide to Traffic Management, Part 12, Integrated Transport Assessments for Developments.

Furthermore, a traffic and transport study shall be prepared in accordance with the Roads and Maritime Services NSW's *Guide to Traffic Generating Developments 2002* and is to include (but not be limited to) the following:

- Review of historical development consents associated with the current approval limits for extraction of sand at the site and importation of sand products from other operations in the Port Stephens local government area.
- Comparison of current (approved) and proposed operations to determine change in traffic generation and the associated impact on the road network.
- Assessment of all relevant vehicular traffic routes and intersections for access to / from the subject properties.
- Details of all traffic types and volumes likely to be generated by the proposal during construction, operation and rehabilitation, including description of heavy vehicle types, and haul route origins and destinations.
- Daily inbound and outbound traffic profile by time of day and day of week broken down per vehicle types.
- Investigate the use of vehicles with higher carrying capacity such as Performance Based Standards combinations to reduce the number of heavy vehicle movements.
- Traffic management plan on how to manage number of vehicles likely to be generated during construction, operation and rehabilitation, and awaiting loading, unloading or servicing that can be accommodated on the site to avoid queuing in the surrounding road network.
- Detailed site layout (if additional works are required) to demonstrate that the site will be able to accommodate the most productive vehicle type as well as the worst performing vehicle

type. This includes parking layout on site in accordance with the relevant Australian Standard and Council's Development Control Plan.

- Details of access to, from and within the site from the road network including assessment of intersection location, design and sight distance. It must be demonstrated that the site plan, site access and surrounding road network can accommodate the largest vehicles entering, exiting and maneuvering throughout the site.

- An assessment of the forecasted daily and peak (AM, PM) vehicle movements impact on road safety and midblock capacity of road network including potential impact on pavement lifespan.

- Traffic analysis of any major / relevant intersections impacted, using SIDRA or similar traffic model, including:
  - Current traffic counts and 10 year traffic growth projections
  - With and without development scenarios
  - 95th percentile back of queue lengths
  - Delays and level of service on all legs for the relevant intersections
  - Electronic data for Transport for NSW review.

- An assessment of the cumulative study area traffic impacts associated with the development and any other known proposed/approved developments in the area.

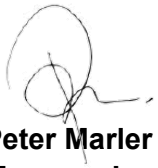
- If required, identification of any dangerous goods likely to be transported on arterial and local roads to/ from the site and, if necessary, the preparation of an incident management strategy.

- Identify the necessary road network infrastructure upgrades that are required to maintain existing levels of service on both the local and classified road network for the development. In this regard, preliminary concept drawings shall be submitted with the EIS for any identified road infrastructure upgrades. However, it should be noted that any identified road infrastructure upgrades will need to be to the satisfaction of Transport for NSW and Council.

- An assessment of any other impacts on the regional and state road network including consideration of pedestrian, cyclist and public transport facilities and provision for service vehicles.

On determination of this matter, please forward a copy to TfNSW for record and / or action purposes. Should you require further information please contact Dipen Nathwani, Development Assessment Officer, on 0418 514 166 or by emailing development.hunter@rms.nsw.gov.au.

Yours sincerely



Peter Marler
Manager Land Use Assessment - Hunter Region