

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-9750
Proposal	The Marulan Quarry Project, which involves: • establishing a quarry to extract and process up to 500,000 tonnes of hard rock per annum for up to 18 years; • importing virgin excavated natural material (VENM), excavated natural material (ENM) and other clean fill material for rehabilitation purposes; • constructing associated site infrastructure and amenities; • transporting material off-site via public roads; and • progressively rehabilitating the site.
Location	16501 Hume Highway, Marulan (Lots 3 and 4 DP 247199 and Lot 7001 DP 1025585)
Applicant	Global Quarries Australia Pty Ltd
Date of Issue	13/05/2019
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 <i>Environmental Planning and Assessment Regulation 2000</i>. 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:
 - whether these measures are consistent with industry best practice, and represent the full range of reasonable and feasible mitigation measures that could be implemented;
 - the likely effectiveness of these measures; and
 - 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: • Noise & Blasting – including: - a detailed assessment of the likely construction, operational and off- site transport noise impacts of the development in accordance with the <i>Interim Construction Noise Guideline</i>, <i>NSW Noise Policy for Industry</i> and the <i>NSW Road Noise Policy</i> respectively, and having regard to the <i>Voluntary Land Acquisition and Mitigation Policy</i>; - proposed blasting hours, frequency and methods; and - a detailed assessment of the likely blasting impacts of the development (including ground vibrations, overpressure, flyrock, visual and fumes/odour) on people, animals, buildings/structures, infrastructure and significant natural features, having regard to the relevant ANZEC guidelines; • Air Quality – including: - a detailed assessment of potential construction and operational air quality impacts, in accordance with the <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i>, and with a particular focus on dust emissions including PM_{2.5} and PM₁₀, and having regard to the <i>Voluntary Land Acquisition and Mitigation Policy</i>; • Water – including: - a detailed site water balance, including a description of site water demands, water disposal methods (inclusive of volume and frequency of any water discharges), water supply infrastructure and water storage structures; - identification of any licensing requirements or other approvals under the <i>Water Act 1912</i> and/or <i>Water Management Act 2000</i>; - demonstration that water for the construction and operation of the development can be obtained 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; - an assessment of any likely flooding impacts of the development; - baseline monitoring data (for both water quality and flows) in Narrambulla Creek, upstream and downstream of the site; - an assessment of the likely impacts of the development (including excavation, wastewater, stormwater and erosion) 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; ○ impacts on Narrambulla Creek, wetlands, riparian land and sensitive soils (sodic and saline); ○ impacts on any regional water supply infrastructure; ○ impacts on adjacent licensed water users and basic landholder rights; and ○ whether the development can operate to achieve a neutral or beneficial effect on water quality, consistent with <i>State Environmental Planning Policy (Sydney Drinking Water</i>

Catchment) 2011;

- a detailed description of the proposed water management system (including wastewater and stormwater management), water monitoring program, erosion and sediment control measures, management measures for imported VENM and ENM, and other measures to mitigate surface and groundwater impacts;
- **Biodiversity** – including:
 - accurate predictions of any vegetation clearing on site;
 - a detailed assessment of the likely biodiversity impacts of the development, paying particular attention to threatened species, populations and ecological communities, regional biodiversity corridors and groundwater dependent ecosystems, undertaken in accordance with the *Biodiversity Assessment Method* and documented in a Biodiversity Development Assessment Report; and
 - a strategy to offset any residual impacts of the development in accordance with 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 documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage; and
 - identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items, with a particular focus on the nearby 'Wandi' (Plumb's Inn) and the potential presence of remnants of the Great South Road;
- **Traffic & Transport** – including:
 - details regarding existing traffic movements along the road network (based on surveys);
 - 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 the transportation of quarry products and importation of VENM and ENM;
 - intersection modelling, incorporating base case and 10-year post-development scenarios;
 - a detailed assessment of potential traffic impacts on the capacity, condition, safety and efficiency of the local and State road network (as identified above), including undertaking a road safety audit;
 - an assessment of the existing intersection layout, including consideration of compliance with AUSTROADS requirements, and any need for deceleration and acceleration lanes;
 - strategic designs for any proposed road upgrading, including consideration of any associated biodiversity, heritage and amenity impacts; and
 - a description of the measures that would be implemented to mitigate any impacts;
- **Land Resources** – including a detailed assessment of:
 - potential impacts on soils and land capability (including a biosecurity risk assessment and response plan and consideration of potential erosion and land contamination);
 - potential impacts on landforms (topography), paying particular

- 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:
 - identification of the quantity and nature of all waste streams that would be generated or received by the development (including the likely sources of imported fill materials) and any measures that would be implemented to minimise, manage or dispose of these waste streams; and
 - detailed procedures for the receipt and handling of all clean fill materials (including VENM and ENM) which prevent unauthorised waste disposal;
- **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 (before, during and post-mining) on private landowners in the vicinity of the development and key vantage points in the public domain, paying particular attention to any new landforms;
- **Strategic Planning** – including consideration of the *South East and Tablelands Regional Plan 2036*, *Goulburn Mulwaree Strategy 2020* and any other relevant local or regional strategic plans;
- **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*, paying particular attention to:
 - 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;
 - the review questions in Appendix D of the guideline; and
 - the recommendations made in Attachment 3;
- **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; - Goulburn Mulwaree Council; - Office of Environment and Heritage; - Environment Protection Authority; - Division of Resources and Geoscience within the Department; - Department of Primary Industries (including NSW Forestry, Agriculture and Fisheries); - Department of Industry (including the Crown Lands and Water Division); - NSW Health; - Water NSW; - NSW Rural Fire Service; and - Roads and Maritime Services; and • establish a Community Consultative Committee for the project in accordance with the <i>Community Consultative Committee Guidelines for State Significant Projects</i>, and consult with the committee during the preparation of the EIS. 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)
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA)
	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'
	National Greenhouse Accounts Factors (Commonwealth)
Noise & Blasting	
	Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Developments (DP&E)
	NSW Noise Policy for Industry (EPA)
	Interim Construction Noise Guideline (DECC)
	NSW Road Noise Policy (EPA)
	Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration (ANZEC)
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 2012 (NOW)
	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 2012 (Commonwealth)
	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)
	Guidelines for the Assessment & Management of Groundwater Contamination (EPA)
Surface Water	State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011
	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)
	Managing Urban Stormwater: Soils & Construction (Landcom) and associated Volume 2E: Mines and Quarries (EPA)
	Managing Urban Stormwater: Treatment Techniques (EPA)
	Managing Urban Stormwater: Source Control (EPA)
	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)
Land	
	Soil and Landscape Issues in Environmental Impact Assessment (NOW)
	Agfact AC.25: Agricultural Land Classification (NSW Agriculture)
	Agricultural Issues for Extractive Industries (DPI)
	State Environmental Planning Policy No. 55 – Remediation of Land
	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 Development (RMS)
	Road Design Guide (RMS) & relevant Austroads Standards
Biodiversity	
	Biodiversity Assessment Method (OEH)
	Fisheries NSW policies and guidelines
	Guidelines for developments adjoining Department of Environment, Climate Change and Water (DECCW, 2010)
	Guidelines for Threatened Species Assessment (DP&E)
	Guidance to assist a decision-maker to determine a serious and irreversible impact (OEH)
	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 No. 44 – Koala Habitat Protection
Heritage	
	The Burra Charter (The Australia ICOMOS charter for places of cultural significance)
	Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH)
	Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (OEH)
	Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH)
	NSW Heritage Manual (OEH)
	Statements of Heritage Impact (OEH)
Hazards	
	State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
	Hazardous and Offensive Development Application Guidelines – Applying SEPP 33
	Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis
	Planning for Bush Fire Protection 2006 (RFS)
Waste	
	Waste Classification Guidelines (EPA)

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
	Goulburn Mulwaree Local Environmental Plan 2009

ATTACHMENT 2

Agency Correspondence

Refer to separate attachment

ATTACHMENT 3

Internal Review of SIA Scoping Report

Marulan Quarry Project (SSD-9750)

Internal review of Social Impact Assessment (SIA) Scoping Report

7 May 2019

Context and approach to this review

The *Environmental Planning and Assessment Act 1979* establishes the framework for assessing all types of development in New South Wales, including State significant development (SSD) projects. The Act requires the consent authority to consider social impacts of a proposed development.

To inform how social impacts should be considered, the Department of Planning and Environment (DP&E) adopted the *Social Impact Assessment (SIA) guideline for State significant mining, petroleum production, and extractive industry development* in September 2017. The guideline was informed by existing good practice, expert advice, and extensive stakeholder consultation, and thereby provides a benchmark against which to review SIA reports.

This review considers the SIA Scoping Report prepared for the Marulan Quarry Project (SSD-9750) (GHD, March 2019). The SIA Scoping Report was provided by GHD on behalf of Global Quarries Australia Pty Ltd with a request for SEARs.

The proposal involves the establishment of a new hard rock quarry.

This review evaluates the SIA Scoping Report's consistency with the principles and methodology set out in the SIA guideline, particularly in relation to the Review Questions 1, 2, and 8-14 in Appendix D of the guideline:

- **Q1 and 2** address the SIA principles and authorship.
- **Q8-11** relate to defining and describing the area of social influence.
- **Q12-14** relate to identification and description of social impacts.

This review is limited to desktop study only and has not independently sought the views of potentially affected people and groups.

Review comments

1. Has the applicant applied the principles in Section 1.3? How?

Table 1 of the Scoping Report identifies the principles underpinning good practice SIA from the guideline. However the principles could be applied more consistently throughout the report.

Principle	Assessment
Action-oriented	Section 8 identifies the next steps in the SIA process. These steps are considered to be practical and achievable. However, please see comments in relation to Q13 regarding the need for effective community engagement.
Adaptive	The SIA should explain how any new information, community feedback or changed circumstances arising during the preparation of the EIS have influenced the proposal, or how the Proponent will seek to respond to those changes.
Distributive equity	The Scoping Report does not adequately consider how social impacts may be distributed across different stakeholder groups or between the current and future generations. See comments in relation to Q8 below.
Impartial	The SIA should ensure that 'community voices' are reported faithfully and impartially. The SIA should also identify the author, and his/her respective social science qualifications and experience.
Inclusive	The Department wishes to emphasise the need for meaningful consultation with all affected stakeholders in the locality in the preparation of the SIA. See comments in relation to Q13 below.
Integrated	Sections 7 and 8.2 discuss the proposed approach to specialist studies in the EIS, including the SIA. However, see comments in relation to Q12 below.
Life cycle focus	The SIA should consider the social impacts of the project at all stages of its lifecycle, including post-closure.
Material	Section 7 identifies potential social impacts and the likelihood of those impacts. However, there is little discussion as to which of those impacts matter the most, or pose the greatest risk to those affected.
Precautionary	Application of the precautionary principle will be subject to further assessment in the EIS.
Proportionate	The SIA should include a detailed evaluation of the significance of each potential negative social impact (see Section C3 of the Guideline).
Rigorous	Section 6 provides a social policy and literature review, however the Department notes that no academic research has been cited.
Transparent	The SIA should include actual responses (or relevant extracts) provided by the community, rather than simply providing feedback summaries.

Recommendations: The SIA should ensure the SIA principles in the Guideline are explicitly addressed, particularly with reference to distributive equity, impartiality, inclusivity, proportionality and transparency.

The Proponent should ensure that the Review Questions in Appendix D of the Guideline are thoroughly addressed in the EIS phase of the SIA.

2. Does the lead author of the Scoping Report meet the qualification and skill requirements in Box 2?

Details of lead author(s) not provided.

Recommendations: The SIA should include details of the lead author within the document, including relevant qualifications and experience.

8. Does the scoping report identify and describe all the different social groups that may be affected by the project?

Section 3.2 provides an overview of surrounding land uses. However, this section focuses on nearby mining and extractive industries and the location of the nearest urban settlements rather than the social characteristics. There is little focus on nearby residents, rural-residential communities and other stakeholder groups which would be most affected by the project, and there is little discussion regarding the views, values and concerns of these residents and stakeholders (as they relate to the project) and how they might be impacted.

Table 7 identifies some key stakeholders, however, there is very little discussion or analysis regarding the social composition of the local area. There is no discussion, for example, regarding vulnerable groups, or how they may be affected by the project.

Section 4.1 identifies three areas of social influence (Local, District and Regional). The 'local' area is defined by the census boundary and is described as the area in which the proposed project may have the highest direct and indirect impacts on surrounding residents and community members. However, this is a relatively small area, and the distinction between the 'local' and 'district' areas may understate the impacts on the northern side of the Hume Highway, and to the east of the project site.

Recommendations: The SIA must clearly identify and describe all of the different social groups that may be affected by the project.

9. Does the Scoping Report identify and describe all the built or natural features located on or near the project site or in the surrounding region that have been identified as having social value or importance?

Further analysis and discussion regarding natural and built features will be required in the SIA. This should be informed by consultation with local stakeholders to ensure it reflects engagement feedback and community values.

Table 9 identifies potential disturbance of Aboriginal heritage items as a potential social impact. The Department notes that impacts on Aboriginal cultural values and sense of place must also be assessed.

Recommendations: The SIA must clearly identify and describe all of the significant built and/or natural features in the locality, following further consultation with local stakeholders.

10. Does the Scoping Report identify and describe current and expected social trends or social change process being experienced by communities near the project site and within the surrounding region?

Section 4 provides demographic information for the local area. However, the Scoping Report does not provide a sense of a 'community voice' or a clear understanding of key issues and concerns within the local area from the perspective of people living there. It is therefore difficult to know whether all key social issues and impacts have been identified and appropriately categorised.

Recommendations: The SIA should include a more rigorous analysis of the current and expected social trends or social change, which is informed by community engagement.

11. Does the Scoping Report impartially describe the history of the proposed project, and how communities near the project site and within the surrounding region have experienced the project to date and others like it?

The project is in the early development stages, and therefore a detailed history cannot be provided. However, Sections 4.5 and 6.2 provide some discussion regarding other extractive industry projects in the locality. It is also important to recognise that a project can have social impacts from the early planning phases.

12. Does the Scoping Report adequately describe and categorise the social impacts (negative and positive), and explain the supporting rationale, assumptions, and evidence for those categories?

Partially satisfied, however:

- while potential impacts are described and categorised in Table 9, there is no sense that these impacts will be analysed from the point of view of the impacted stakeholders;
- reliance on specialist studies (eg in relation to noise impacts) is likely to overlook the experience of impacts, even where technical standards are met; and
- while Table 9 identifies some potential health impacts (ie air pollution and water contamination), stress and potential mental health impacts have not been considered.

Recommendations: The description and categorisation of potential impacts should be further detailed in the SIA, informed by meaningful community engagement.

A coordinated approach should be adopted with respect to all specialist studies prepared for the EIS. While technical assessments consider the impacts of the project against relevant policies and standards, the SIA should consider how those impacts are likely to be experienced by different social groups.

13. How has the feedback from potentially affected people and other interested parties been considered in determining those categories? Does the Scoping Report outline how they will be engaged to inform the preparation of the SIA component of the EIS?

Initial engagement activities are summarised in Section 5.1 of the Scoping Report. Initial consultation targeted only a limited number of residents, and the response rate appears to have been quite low (ie only 5 responses). The key concerns identified through community feedback have been incorporated into Table 9.

Section 8.1 outlines the next steps for community engagement, including discussions with the local Council, Chamber of Commerce and Community Network. However, no additional consultation with affected residents appears to have been contemplated.

Recommendations: The Department strongly recommends additional consultation with affected stakeholders during the preparation of the SIA. This consultation should aim to:

- engage with a wider geographical area, rather than being limited to residents on Winfarthing Road;
- engage with a variety of stakeholders, including Registered Aboriginal Parties and any nearby business operators (including agricultural operations);
- use a variety of engagement techniques, rather than relying on letter box drops; and
- clearly and authentically document feedback by stakeholder group and/or location, including how feedback has contributed to project development or will be incorporated into proposed mitigation measures.

The SIA process should provide genuine opportunities for affected stakeholders to identify, characterise and consider the likely significance of social impacts.

The SIA will also need to include a monitoring and management framework, as per Section C.5 of the Guideline.

14. Does the Scoping Report identify potential cumulative social impacts?

Cumulative impacts are identified in Table 9. Section 8.2 also indicates that a Cumulative Impact Assessment will be included in the EIS.

Recommendations: The EIS will need to include a detailed assessment of cumulative social impacts at all stages of the project. This will need to include consideration of 'spatial', 'temporal' and 'linked' impacts, as outlined in Section 1.1 of the Guideline.