

Minister of Planning and Public Spaces
Department of Planning Housing and Infrastructure
Locked Bag 5022,
Parramatta NSW 2124

18/03/25

Sent via Planning Portal

Re: Submission SSD-10417-Mod-1 Surface Water - Comments

Regional Hardrock (Dubbo) Pty Ltd, wish to make a submission on the abovementioned application to modify SSD-10417 located on Lots 221 and 222 DP 1247780 Sheraton Road, Dubbo, NSW, 2830 based on the following grounds.

While we support the diversion of surface water away from the operational areas of the Dubbo Quarry, we do so based on making the following comments in relation to the overall site water management strategy as detailed below. Regarding s287 of the EP&A regulation we understand this submission is duly made and is classified as a comment on the proposed development.

Broadly, it is understood that the consent SSD-10417 provides a range of conditions that requires the applicant to consider site water flows, transfers of water, assessment of the impacts of this on other water users and develop a site water balance model. Where impacts to other water users are identified, consultation occurs, and solutions are provided. The modification report refers to many of the conditions relevant to these processes have previously been satisfied through the development of a Water Management Plan endorsed by Department of Planning on 31st of January 2024. This plan also confirms that the consultation during its development found that no third-party water users will be impacted but the WMP provides procedures to address any future impacts.

Our concern put simply is that the approach to water management in the East Pit has the potential to raise groundwater levels in areas of the South Keswick Quarry approved to extract to levels of 275m AHD. We understand that the Water Management Plan predicts impacts to occur based on the following;

- Historical excavation of the East pit into the underlying pressurised aquifer (paleochannel)
- Cessation of dewatering in East Pit enabling pressurised ground water to rise
- Additional transfer of other quarry water into East pit to form a lake further rising levels
- No monitoring bores located in the paleochannel area were used to establish baseline groundwater levels or monitor future ground water level impacts.

Given this we ask that the Department of Planning to further consider this predicted impact with the applicant through ongoing monitoring of groundwater levels of the paleochannel to validate predicted impacts of rising groundwater levels. Given these concerns we reserve the right to revisit conditions A19, B29-B32 and B39 with respect to this issue upon receiving future groundwater monitoring results from the implementation of this strategy.

Regards,

A handwritten signature in black ink that reads "Steve Guy".

Steve Guy
General Manager
Planning & Projects