



ABN 86 023 614 567

Administration Centre:
2 Court St Forbes NSW 2871

All mail to:
General Manager
PO Box 333
Forbes NSW 2871

General Enquiries:
T 02 68 502 300
F 02 68 502 399

**Mayor and
General Manager:**
T 02 68 502 304
F 02 68 502 399

Engineering Services:
137 Lachlan Street
Forbes NSW 2871
T 02 68 502 874
F 02 68 502 899

Environmental Services:
T 02 68 502 344
F 02 68 502 398

Email & Web:
forbes@forbes.nsw.gov.au
www.forbes.nsw.gov.au

22 May 2018

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attn: Phillipa Duncan

**Subject: Cowal Gold Mine – Modification 14 – Proposed
Processing Rate Increase**

Dear Sir/Madam

I am writing to you regarding Modification 14 to Cowal Gold Mine – Proposed Processing Rate Increase. I refer to a phone call on 15 May 2018 between Phillipa Duncan, Department of Planning and Environment ('DPE') and myself granting Forbes Shire Council an extension on our submission for the above proposal.

The documents submitted in support of the proposal have been reviewed. I understand that the proposal includes the following:

- Increasing the ore processing rate from 7.5 million tonnes per annum (Mtpa) to 9.8 Mtpa.
- Implementation of crushing circuit at plant.
- Construction of a new pipeline through Lake Cowal and into the Forbes Shire Council area.
- The temporary employment of 100 more staff during the construction period.
- A temporary increase in heavy vehicle traffic.

Upon reviewing the submitted documents, a number of matters have been raised that require resolution. Forbes Shire Council ('Council') trusts that the proponent is willing to work with it to resolve these matters, and requests that the DPE allow for these discussions to take place prior to making a determination on the proposal.

Proposed Pipeline

Based on our examination of the documentation provided by the applicant regarding the construction period of the proposed pipeline, there appears to be some details lacking. Prior to a determination of the proposal, Council requires full details of the placement, depth, design and construction of the proposed pipeline, its impact on residents and background traffic.

The proponent appears not to have provided details on the size of heavy vehicles used for the delivery of pipe, and a map of the route the heavy vehicles will be taking. Prior to a determination being made on this development, Council requires the following information:

- Details of any ancillary construction site offices during the construction period of the proposed pipeline;

- Details of depth and placement of pipeline, specifically under any public roads;
- A detailed map showing existing easements and the exact placement of the proposed pipeline;
- Comprehensive details on the size, origin and destination of heavy vehicles and their haulage routes;
- Proposed routes of heavy vehicles and other construction related traffic during the construction period of the pipeline;
- Details of parking for heavy vehicle and other construction related traffic, as well as turning areas and temporary storage during the construction phase of the proposed pipeline;
- Interaction with any school buses using the route; and
- A decommissioning plan for the pipeline.

Pursuant to Section 138(1) of *The Roads Act 1993*, the applicant must seek consent from Council prior to any work on the pipeline commences that may disturb the surface of a public road, including works in, on or over a public road.

Construction and Ongoing Operational Traffic

The Road Transport Assessment appears to lack some detail regarding the numbers, size, origin and destination of the additional heavy vehicles required for the project. Before a determination on the proposal is made, Council requires this information to determine if intersection or road upgrades are required before the project can commence and funding arrangements for both road or intersection upgrades and ongoing financial contributions for repair and maintenance.

Council notes that the applicant is proposing to create a Traffic Management Plan (TMP) in consultation with Bland Shire Council, Forbes Shire Council and Roads and Maritime Services. Council welcomes this, and proposes that the DPE, within its determination of the proposal, require the following:

- That a Dilapidation Report be created in consultation with Bland Shire Council, Forbes Shire Council and Roads and Maritime Services before and after the proposed construction period;
- That the proponent commit to ensuring all roads impacted by the proposal are maintained at a similar or better condition than they were at the time of the Dilapidation Report; and.
- Details of any proposed road closures during the construction period of the pipeline.

Prior to the commencement of any proposed road upgrades, the applicant must seek consent from Council under Section 138a of *The Roads Act 1993*.

Council requests of the DPE that it liaise very closely with Council in the joint formulation of any consent conditions pursuant to roads and traffic matters.

Water

Section 4.24 of Appendix B Hydrological Assessment states that Coffey (2018) modelled the maximum extraction rate appropriate for Bland Creek Palaeochannel Borefield at 5.9ML/day. However, Council understands the applicant is proposing a maximum extraction rate of 15ML/day. Further justification is required for this discrepancy, and plans on how the applicant proposes to minimise any impact to the Borefield must be detailed prior to a determination being made on the proposal. Council requests the DPE closely engage with it on water take matters.

Council is acutely aware that many residents in its Local Government Area rely on the surface water and related groundwater of the Lachlan River for their livelihoods. We are regularly contacted by residents concerned with the use of water by various state significant development construction sites within our Council area. Council requests that robust and transparent information regarding the surface water and groundwater take by Cowal Mine is made available to the public on a real-time basis.

Gravel Extraction

Council seeks increased clarity regarding the cost of the gravel supplied to it. For instance it is not clear whether the proponent is proposing to sell the gravel privately as well as to the Councils and Roads and Maritime Services. If this is the case, a Development Application would be required. Further clarity is required to ensure that an appropriate share of gravel is reserved for each council.

Thank you for providing Council with an opportunity to comment on this proposal. I trust this information is of assistance. As the Assessment Branch of DPE is already aware from other projects, Council is keen for close engagement as the Department goes about its assessment work on major projects such as this. We therefore look forward to communications that will deliver an outcome that is fair and transparent for all, including Council and its residents and ratepayers.

Should you have any enquiries, please contact the undersigned on **6850 2344**

Yours faithfully



Paul Bennett
Director
ENVIRONMENTAL SERVICES & PLANNING