



Blayney Shire Council

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A/Director - Resource Assessments
Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

RE: McPhillamys Gold Mine Project
Application No. SSD-9505
EPBC ID Number 2019/8421

Please find enclosed Council's submission on the State Significant Development Application – McPhillamys Gold Mine Project – currently on public exhibition.

Should you require further information in relation to this submission please contact Council on Ph 6368 2104.

Yours faithfully

Rebecca Ryan
General Manager

Blayney Shire Council Submission – McPhillamys Gold Mine Project

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Executive Summary

Blayney Shire Council acknowledges the positive economic stimulus, employment, diversity of income and local business opportunities that will arise from the McPhillamys Gold Mine proposal if the project is approved. Council is supportive of this generation of regional growth and has a long history of productive working relationships with a gold mining company in the Shire.

While our community generally appreciates the economic benefits that a new mine will bring, these benefits will be enjoyed by the wider region and NSW economy. Council acknowledges and is concerned for the residents of Kings Plains, living so close to the project who will bear the impact and disruption on their daily lives for many years.

In considering the Environmental Impact Statement (EIS) for this project, it confirms future generations of Blayney Shire will be living with impacts and depending how closure and rehabilitation is undertaken; a potential legacy well past closure of the mine. Council asks that the Department of Planning, Industry and Environment (DPIE) diligently considers and ensures risks are mitigated and any adverse impacts are considered and addressed, with measures in place for ongoing compliance.

Council seeks a commitment from the proponent that if the project is approved, not to default closure and rehabilitation to livestock grazing, but to commit to investigating alternate land uses suitable for the site post mining which could utilise the mines infrastructure to provide ongoing long term economic benefit for the Blayney Shire and wider region.

The Blayney Shire Community Strategic Plan (2018/28) recognises that Blayney is an agricultural shire with strong mining heritage with many opportunities for economic growth building on the productive agricultural land, transport, tourism, industry and mining activities.

Mining is an important and significant industry in the Shire as demonstrated by the latest REMPLAN data which incorporates Australian Bureau of Statistics' (ABS) June 2018 Gross State Product, 2016/2017 National Input Output Tables and 2016 Census Place of Work Employment Data¹.

- Mining accounts for 45%, Manufacturing 20% and Agriculture 7.5% of the \$1.7 billion output generated by the Blayney economy².
- Of the Blayney Shire workforce which is estimated to be 2,991 people; 24% are engaged in the mining sector, with Agriculture 13% and Manufacturing 12%³.

¹Sourced from <https://www.economyprofile.com.au/blayney/> 22 Oct 2019

²Sourced from <https://www.economyprofile.com.au/blayney/industries/output> 22 Oct 2019

³Sourced from <https://www.economyprofile.com.au/blayney/industries/employment> 22 Oct 2019

- Wages and salaries paid by businesses and organisations in the Blayney Shire is estimated at \$262 million with mining accounting for 37%, Manufacturing 14%, Agriculture 6%, Health and Education 6%⁴.

The collective vision of the Regional Economic Development Strategy (2017) is for the region to *'be a larger and more diverse regional economy with a vibrant network of towns and villages which leverage opportunities from being at the heart of NSW in order to grow wealth and prosperity'*. This strategy aims to leverage the region's strategic advantages and natural resource base and recognises the strengths of the region, including specialisations in mining, sheep and beef cattle farming, food product manufacturing, healthcare, education and State Government administration with the emerging potential of tourism.

The primary aims of the strategy include:

- driving tourism growth and enhance the liveability of the region
- building on the region's core specialisation in healthcare
- realising economic opportunity in education and public administration
- supporting economic growth in mining and mining services
- developing agriculture, agricultural processing, agri-technology and manufacturing

The Central West and Orana Regional Plan 2036 which is the 20-year blueprint for the future of the region has a vision being *'to create a leading diverse regional economy in NSW, with a vibrant network of centres leveraging the opportunities of being at the heart of NSW'*. The vision will be delivered through four goals:

- The most diverse regional economy in NSW
- A stronger, healthier environment and diverse heritage
- Quality freight, transport and infrastructure networks
- Dynamic, vibrant and healthy communities.

Council endorses these strategic planning documents which seek to deliver a balance of creating diverse economic activity with minimal environmental impact ensuring Blayney Shire is an attractive locality to reside.

⁴Sourced from <https://www.economyprofile.com.au/blayney/industries/wages-salaries> 22 Oct 2019

Voluntary Planning Agreement

The objective of a Voluntary Planning Agreement (VPA) is to ensure that Council and Regis Resources proactively manage the potential impacts to secure a positive future for the communities of the Blayney Shire Local Government Area (LGA), including Kings Plains and Blayney township residents.

Council have authorised the General Manager to commence discussions with Regis Resources Ltd in regards to a proposed VPA in accordance with NSW DPIE and NSW Mining and Energy Related Council guidance policies. Initial discussions between Council's General Manager and Regis Resources were held in late 2018, however further negotiation will not take place until the closure of the EIS public exhibition period.

Should the project be approved, the mining extraction site and impact is completely within the Blayney Local Government Area. Council expects that a Voluntary Planning Agreement for the life of the project, would be successfully negotiated and agreed upon prior to the assessment process being completed.

Blayney Shire Council does not believe a VPA should include; Cabonne, Orange City or Bathurst Regional Councils. Cabonne, Orange and Bathurst will receive only benefits from this project, whereas Blayney Shire will receive 100% of the impact, potentially ongoing post mine closure.

The VPA proposed will likely be based on a % of total Capital Investment Value (CIV) and allocated to one off and annual contributions; as negotiated and agreed upon by Council and Regis Resources prior to public exhibition as required by the regulations.

Contributions could be allocated to community, sporting, environmental and local roads infrastructure projects identified in the various Blayney Shire strategic planning documents as determined by Council for the duration of the VPA.

Accommodation Needs

Mining, whilst benefiting the local economy can add pressure for housing demand, employment and tourism, in particular during construction. As noted in the Social Impact Assessment (SIA), Blayney LGA does not have the capacity to meet the construction or even production workforce demands.

Mine workers and their families will be required to seek accommodation in both Orange and Bathurst, which are approximately 30 minutes commute time away. It has been identified that there will be a temporary and cumulative shortage of short term accommodation which will impact the non-mining sector, private rental accommodation and tourism markets and events in the Orange360 region and Blayney Shire.

In this instance if the project is approved the impact will be additional and ongoing that is expected to the Infigen Flyers Creek Wind Farm project, due to commence in early 2020 for a 2 year construction period and the recently announced expansion at Cadia Valley Operations, commencing January 2020.

In October 2019, Cadia Valley Operations (Newcrest Pty Ltd) provided funding to Orange360 to engage a contract Accommodation Coordinator to facilitate and address the accommodation impacts of a significant major development. In this instance the role will act as the single point of contact for the mining workforce to liaise with real estate agents, tourism operators, private rental owners and other accommodation agents coordinating contract workforce accommodation needs for contractors, mine workers and their families. This is a proactive business decision by Cadia Valley Operations which will reduce costs borne by them from contractors in addition to providing a coordinated approach that will find the 'hidden beds' in Blayney and surrounds. The recommendation in the SIA for a similar Accommodation Coordinator role for this project if approved, is supported by Blayney Shire Council.

Mining production, whilst a significant economic driver will impact housing availability and affordability which Blayney has experienced with operations at Cadia Gold Mine. Council is cognisant of the inflated housing market that may result and the need to facilitate affordable and diverse options for people to relocate to the shire. Blayney and the villages have the capacity for additional population and the Community Strategic Plan recognises the need for sustainable growth.

Council notes the SIA does not propose a Mining Camp. Council supports the preference for supporting existing and new local accommodation options to encourage greater longer term and sustainable housing diversity and growth.

- **Council recommends that in addition to any VPA, that Regis Resources provide funding for an Accommodation Coordinator role.**

Transport

The project if approved, will create a significant number of traffic movements particularly during the construction period. These movements have the potential to significantly impact on both the community and Council's local road network.

- **Council requests that should the project be approved a condition of consent is included requiring Regis Resources to:**
 - **Develop a Transport Management Plan that requires all construction traffic and transport to only utilise the NSW State Road network, and also minimise transport movements during school zone times on roads adjoining; Blayney Public School, Blayney High School, St Joseph's Primary School Blayney and Millthorpe Public School.**

Dungeon Road

In the EIS, Regis propose to close Dungeon Road from approximately 1,800m North of the Mid-Western Highway (EIS p473), being at the 'mine project boundary'.

Blayney Shire Council notes that the EIS does not define the 'mine project boundary', but identifies the Mine Development Project Area, and the Mine Lease Application Area on various maps and figures.

The southern boundary of the Mine Development Project Area intersects with Dungeon Road approximately 550m north of the intersection with the Mid Western Highway, being the southern boundary of Lot 12 DP 531188 and Lot 14 DP562837. Blayney Shire Council in principle agrees to the partial closure of Dungeon Road from this point, as the only access beyond this point is to service the proposed development or property owned by the proponent.

Council notes access for local residents on Dungeon Road, south of the Mine Development Project Area will remain by public road as currently is the case.

There are 2 properties with dwellings in close proximity to the Mine Development Project Area off Dungeon Road. It is highly likely these 2 properties will be impacted by dust from increased traffic on Dungeon Road until the new mine access off the Mid Western Highway is constructed. To mitigate dust impacts on these 2 properties Council seeks that Dungeon Road is sealed for an extended distance (potentially 1,000m) north of the intersection with the Mid-Western Highway.

Council notes that the disposal of this Council asset is subject to an agreed Purchase Price.

Council propose that the formula approved will be the combined value of the Road Valuation plus Land Value. Land Value will be calculated on the median sale price for rural land in the district, undertaken by an independent Certified Practising Valuer.

- Council requests that should the proposal be approved a condition of consent be included requiring Regis Resources to undertake the following prior to construction:
 - Undertake the closure of Dungeon Road from 550m North of the intersection with the Mid Western Highway to the boundary between the Local Government Areas of Blayney and Cabonne.
 - Upgrade a minimum 550m of Dungeon Road from the intersection with the Mid Western Highway to the Mine Development Project Area boundary to Council's Rural Collector standard, in accordance with Council's Guidelines for Engineering Works.
 - Seal Dungeon Road an extended distance (potentially 1,000m) north of the Mid-Western Highway intersection to reduce dust impacts on the properties at the Southern end of Dungeon Road or alternatively outline to the satisfaction of Council and the 2 residents how dust impacts will be mitigated during the main entrance contraction.
 - Prioritise the construction of the new main site access to the Mine Development Project Area, at the preferred location on the Mid-Western Highway to minimise traffic noise and dust impacts on existing residents on Dungeon Road.
 - Purchase the remaining portion of Dungeon Road (being from the Mine Development Project Area boundary at Ch.550m) to the Local Government Area boundary between Blayney and Cabonne, at the pre-determined combined value of the Road Valuation as at June 2020 plus Land Value as per Independent Valuation from a Certified Practising Valuer.

- Council requests that upon commissioning of the new main site access to the Mine Development Project Area, a dilapidation report for the upgraded section (550m) of Dungeon Road be prepared in conjunction with Blayney Shire Council, and Regis Resources be required to make any repairs to the upgraded section to return it to Council's Rural Collector standard upon commissioning of the new main site access.

Guyong and Vittoria Roads

If the project is approved, both Guyong and Vittoria Roads will have additional traffic as a result of workers and contractors driving from the North West ie Orange and Spring Hill/Millthorpe area.

Regis identify that *'the majority of traffic originating from the north-west (ie Orange) are anticipated to use Vittoria Road and Guyong Road' and 'Project related traffic represents a maximum of 18% increase above background traffic along Guyong Road (during Year 1 of the project)'.*

Council remains concerned the EIS makes no specific reference to metrics on expected changes in traffic along Vittoria Road.

Council reiterates its request outlined earlier in the submission that if the project is approved that transport associated with the development primarily uses the NSW State Road network, during the construction phase. If this cannot be achieved or undertaken, a Road Safety Audit has been completed, which identified a small number of safety issues which could be undertaken to improve both Vittoria Road and Guyong Road and Council would request Regis fund the safety improvements.

Council's primary concern with the use of Guyong Road for mine traffic is the current poor alignment and lack of line marking as identified within the Audit. Council will undertake the line marking prior to construction, however still holds concerns with the alignment of Guyong Road. With the proposed increase in traffic, the risk of collision between vehicles will increase along Guyong Road.

If the project is approved, Council would seek to facilitate a joint grant application in the future for a major upgrade to Vittoria Road between the Mitchell Highway and Millthorpe village.

Vittoria Road is already under significant pressure particularly being utilised by workers travelling to Newcrest's Cadia Valley Operations mine. The McPhillamys Gold Project would likely further accelerate the deterioration of Vittoria Road.

Council is not seeking Regis to fully fund a major upgrade to Vittoria Road, but is identifying as a key stakeholder expected to be a joint stakeholder, together with; Blayney Shire Council, Cabonne Council and Newcrest seeking to obtain NSW and/or Federal Government funding for a major upgrade to Vittoria Road.

- **Council requests that Regis Resources be required to upgrade the final 3.8km of Guyong Road to ensure suitable curves are provided for the safety of all road users if the NSW road network is not primarily utilised during the construction phase of the development.**

Noise, Dust and Vibration

The EIS contains a vast amount of data and analysis regarding the potential impacts of the proposed McPhillamys Gold Project regarding; noise, dust and vibration.

Council acknowledges these matters are specialist fields. Given Council does not employ specialist staff with experience in these fields, it is difficult for the organisation to interpret, provide comment, verify the assessments and studies against the industry best practice and acceptable industry thresholds and ultimately the conclusions outlined in the EIS. Council is relying on NSW Government agencies with the specialist expertise to scrutinise the EIS against the industry best practice and acceptable industry thresholds.

It is acknowledged by all parties that many of the residents at Kings Plains will potentially be living extremely close to the proposed mine. The mine development and earthworks required in the first few years will have an adverse impact and affect their quality of life that they currently enjoy. If the McPhillamys Gold Project is approved it is critical that the proponents support and work with each resident to develop individual solutions to mitigate the negative impacts on their lifestyles especially in regards to dust and noise.

- **While the EIS broadly concludes that the proposal will have impacts in regards to noise, dust and vibration, Council emphasises the importance of and Councils reliance on various NSW Government Agencies undertaking a robust assessment to ensure that the McPhillamys Gold Project would not have more than a minimal impact on Kings Plains residents.**
- **Council also emphasises the importance to the Department that if approval is granted Council and the community are highly reliant on multiple NSW Government organisations to ensure the ongoing operational compliance of the mining operation.**

Visual Amenity

The EIS identifies that the construction and operation of the proposed McPhillamys Gold Project will result in a very high visual impact, particularly when viewed from the Mid Western Highway and Walkom Road, Kings Plains, as well as other viewpoints including residential properties.

If the McPhillamys Gold Project is approved it is critical that the proponents support and work with each resident to develop individual solutions to mitigate the negative impacts on their lifestyles especially in regards to visual amenity.

- **Given that the project development area is located within a visually sensitive location, Council emphasizes the importance that the DPIE ensure that suitable controls and measures be implemented to ensure that any potential visual impact is minimized.**

Light Pollution

Whilst Blayney is 338km from the closest Dark Sky Park and distance is outside the 200km radius prescribed in The Dark Sky Planning Guideline (NSW DPIE, 2016) light pollution from Central Tablelands extractive industries at 800 metres above sea level has the potential to impact the night sky.

The light pollution impact on Kings Plains residents given comparative dark skies, the night time glow may be significant if not addressed. It is anticipated that light pollution be minimised by appropriate mitigation measures, LED lighting and best practice fittings on plant, buildings and machinery.

- **Council requests that the project, if approved, ensures the impact of lighting is considered and addressed in accordance with industry best practice and Australian Standards.**

Natural Environment – Water (surface and ground), Aquatic Ecology & Terrestrial Biodiversity

The natural environment, including water (surface and ground), aquatic ecology and terrestrial biodiversity, is a significant asset of the wider Blayney Shire.

In particular, it is noted that many elements of the natural environment underpin the economic and social strength of the community, as well as defining Shire's character and rural / village amenity.

Particular examples of significant elements of the natural environment include:

The Belubula River

The Belubula River, which has its head waters within the disturbance footprint of the proposed mine development area, is the main water source for a vast number of rural properties within and beyond the Blayney Shire before reaching the Lachlan River. The river is also the main source of water to Carcoar Dam for which the main purpose is to supply irrigation, stock and household needs within the Belubula Valley.

The river is also a significant feature of Carcoar village, making a significant contribution to its historic setting as well as public recreation areas. Notably, Carcoar is classified by the National Trust as a built environment of significant interest.

The Belubula River also flows through the township of Blayney.

The Belubula River is also well known for fishing, with popular native fish species including Murray Cod and Golden Perch.

Ground water

A clean and safe supply of groundwater is essential for the drinking water needs of country towns, major industries (especially agriculture) and to support groundwater dependent ecosystems. Groundwater quality decline and contamination creates a serious threat to human and animal health and the degradation of wetlands and rivers.

While it is acknowledged that the mine project development area is within an area of low groundwater vulnerability, it must be acknowledged that the key risk to groundwater sources is contamination by leakage into the water table of pollutants.

White Box Yellow Box Blakely's Red Gum Woodland

Highly significant terrestrial biodiversity within the Blayney Shire includes the White Box Yellow Box Blakely's Red Gum Woodland (commonly referred to as Box-Gum Woodland) which is identified as an endangered ecological community under NSW legislation and a critically endangered ecological community under Federal legislation.

The NSW Threatened Species Scientific Committee has identified that the Box-Gum Woodland has been drastically reduced in area and highly fragmented because of clearance for cropping and pasture improvement, with the community being reduced to less than 1% of its pre-European extent in many areas of NSW.

If approved the McPhillamys Gold Project would require 18.5ha of the Box-Gum Woodland to be cleared.

Notably, the NSW Threatened Species Scientific Committee has identified that In view of the small size of existing remnants, and the threat of further clearing, disturbance and degradation, the Box-Gum Woodland is likely to become extinct in nature in New South Wales unless the circumstances and factors threatening its survival or evolutionary development cease.

The EIS contains a vast amount of data and analysis regarding the potential impacts of the proposed McPhillamys Gold Project on the natural environment,

Given that Council does not employ specialist environmental staff, it is difficult for the organisation to interpret such data and verify the assessment that has been set out in the EIS.

- **While the EIS broadly concludes that the proposal will have no serious or irreversible harm, Council emphasises the importance of the DPIE undertaking a robust assessment to ensure that the McPhillamys Gold Project would not have more than a minimal impact on the natural environment to both individual elements and the cumulative natural environment.**

Aboriginal Cultural Heritage and Historic Heritage

The EIS appears to contain a robust assessment of the potential impacts on Aboriginal Cultural Heritage and post European historic heritage, including proposed management measures.

Given that Council does not employ specialist heritage staff, it is difficult for the organisation to interpret and verify the assessment that has been set out in the EIS.

- **Council emphasises the importance of the DPIE undertaking a robust assessment to ensure that the McPhillamys Gold Project would not have a detrimental impact on Aboriginal Cultural Heritage and post European historic heritage.**

Agriculture

The mine development project area is located within a broader landscape which is predominately zoned RU1 Primary Production.

It must be noted that the objectives of the RU1 Primary Production Zone focus on minimizing the fragmentation and alienation of the natural resource base which underpins sustainable primary production, and to encourage sustainable primary industry.

With specific regard to agriculture, these objectives are further emphasised and strengthened by the *Central West and Orana Regional Plan* of which the first direction specifically seeks to '*Protect the region's diverse and productive agricultural land*'.

Notably, this direction must also be balanced with the eighth direction of *Central West and Orana Regional Plan* which seeks to '*Sustainably manage mineral resources*'.

While the Central West and Orana Regional Plan identifies that the mineral resources sector underpins many local economies and continues to drive growth, it articulates the sustainable management of mineral resources must consider and balance varying impacts to produce long-term economic, social and environmental outcomes.

- **In this regard, Council seeks to emphasise the importance of the DPIE ensuring that if that if the proposed McPhillamys Gold Project is to be approved, the impacts of a relatively short total project life do not disproportionately affect ongoing sustainable primary production in the immediate area.**

Post Mine Use, Rehabilitation and Closure Strategy

Following on from the comments under the Agriculture heading above, Council acknowledges that whilst there may be 10 to 15 years of significant economic benefit generated from the McPhillamys Gold Project, the EIS also confirms once mining is completed the site be a legacy site for many years into the future.

The EIS references that a Rehabilitation and Closure Strategy (EMMA 2019) appendix U has been prepared and that final rehabilitation and closure requirements will be ultimately be produced within five years of closure.

The EIS outlines if the project is approved, a significant amount of infrastructure will be installed and/or constructed for the project, including but not limited to; water pipeline from Lithgow, new water storage dams, safe site access and internal roads, electrical line upgrades, amenities etc. This infrastructure investment is unprecedented and must be considered for alternate post mining reuse, rather than simply decommissioned.

Given the site will possess unprecedented infrastructure investment the site needs to be investigated for suitable post mining land uses that could utilise and/or add to the infrastructure installed for the mine. One such land use is creation of an intensified agricultural precinct (in particular protected cropping and/or hydroponics) that based on the infrastructure of the site could be of a regional or state significant which currently does not exist in NSW and Australia.

Council does not accept nor endorse the default position for closure and rehabilitation strategy to be livestock grazing. There is an opportunity, given the infrastructure required for the mine project to provide Blayney Shire and the region with a long lasting positive economic legacy through identification and master planning of a suitable post mining land use.

Council is seeking commitment from the proponent that it will investigate in partnership with; Blayney Shire Council and key NSW Government agencies (in particular DPIE and Regional NSW) suitable land uses, companies and other opportunities which could further utilise the site post mining prior to finalisation of any Rehabilitation Closure Strategy and/or Rehabilitation Plan.

Council notes such a precinct is already identified for Blayney Shire in the Central West and Orana Regional Plan, which the priority states *'Investigate the development of a regionally significant intensified agricultural precinct for agribusiness, leveraging existing strategic advantages and future infrastructure'*.

If a suitable alternate land use can be identified pre closure it is noted it may be financially beneficial to the proponent as significant capital expenditure may be saved as it could reduce the level of rehabilitation required, whilst providing the Blayney Shire and wider region with a long lasting positive economic legacy for the region.

- **Council requests that should the project be approved a condition of consent requires the proponent; prior to any Rehabilitation and Closure Strategy and/or Rehabilitation and Closure Plan being approved, the proponent must demonstrate to the satisfaction of the Secretary of the NSW DPIE evidence that it has considered and investigated in partnership with Blayney Shire Council and other key NSW Government agencies the feasibility for alternate land uses that will utilise the site and associated infrastructure.**

Workforce Strategy and Local Businesses

Council notes that if the project is approved the workforce strategy that is proposed by Regis is to have a recruitment program that maximise local employment with employment numbers averaging around 260 FTE during operations. Council supports this position to encourage increased employment opportunities within and for residents of the Shire.

If the project is approved, the management of mine closure is as important as the commencement. In this regard it is important, Council and the community are involved prior to closure to create a smooth transition for worker redeployment and ensuring other local businesses can adjust to the potential removal significant GDP which will no longer be in the region.

Blayney Shire Council would encourage Regis mining to adopt a program of continuous training for their workforce to make sure that all employees as far as possible have real transferable skills that they can use towards future employment after mining.

Regis could be a leader in developing individual training and career pathways for their employees from the start of their employment to the inevitable conclusion of mine operations.

If approved there is a huge expectation from our community around the rehabilitation of the mine site and minimising the environmental impacts. But the significant social impact of the unemployment at that time could be mitigated by Regis planning to have an appropriately trained workforce that will be able to transfer into other sectors within our shire and region. This would be a very modern and responsible strategy to manage a workforce that will have options and future opportunities after mining.

Our region is very fortunate to have excellent training providers and organisations that could partner with Regis to facilitate the ongoing training and management of this strategy. We would also expect strong support from government agencies to also be involved in developing and supporting this type of workforce resilience strategy.