

27 September 2018

Environmental Assessment Officer
Resource & Energy Assessments
Planning Services
Department of Planning and Environment
GPO Box 39 SYDNEY NSW 2001
Attention: Ellen Jones

Dear Ellen

Subject: Eraring Power Station Ash Dam Expansion MOD 1 (MP 07_2284)
Response to Environmental Assessment

Thank you for the opportunity to comment on the Modification request for Eraring Power Station Ash Dam lodged by Origin Energy.

The Environmental Assessment has been reviewed by Council staff. The following comments are requested to be considered in your determination of the proposal.

Land Use Planning

The proposal is permissible as incidental or ancillary within the SP2 Infrastructure – Electricity Generation Works zone of the Lake Macquarie Local Environmental Plan 2014 (LMLEP).

Visual Impact

The proposal is located to the north west of the existing ash dam which is unlikely to result in a significant visual impact

Flora and Fauna

The following matters are raised in relation to flora and fauna issues:

- Figure 3.2- Koala and *Acacia bynoeana* are shown with very similar symbols- please clarify by using different symbols.
- There is 8.96 ha of *Tetratheca juncea* species habitat within the development area. The number of plants within the development area is not reported, although are shown on Figure 3.2. The BAM calculator develops *Tetratheca juncea* offsets via areas of habitat, rather than number of individual plants (as done under the previous BBAM). The use of areas of habitat rather than number of plants to calculate *Tetratheca juncea* offsets does not adequately reflect the dense areas of *Tetratheca juncea* as shown on Figure 3.2, and underestimates the biodiversity offsets. Biodiversity offsets for *Tetratheca juncea* should be based on the number of *Tetratheca juncea* plants to be cleared, as this method more accurately reflects the impact on the species and required biodiversity offsets to compensate for this loss.

- Native vegetation nominated for clearing forms part of a corridor in Council's Native Vegetation and Corridor Map v1(2011). Development as proposed would reduce and further fragment the mapped Native Vegetation Corridor. It is suggested that as part of the minimisation measures in Section 4.3 of the report, on-site compensatory measures (such as revegetation works) be undertaken within other areas of the Native Vegetation Corridor onsite which are in need of rehabilitation, to strengthen and consolidate the corridor across the site. The proposed mitigation measures shown in Table 4.1 should form part of a condition any approval granted, perhaps through a Vegetation and Fauna Management Plan or similar.
- Diverted surface water flow would ultimately flow into Coastal Wetlands listed under the Coastal Management SEPP. An assessment of impacts on the Coastal Wetlands and proposed mitigation measures should be undertaken as per Clause 10 of the Coastal Management SEPP to demonstrate if sufficient measures have been, or will be, taken to protect, and where possible enhance, the biophysical, hydrological and ecological integrity of the coastal wetland.
- The provision of local biodiversity offset sites is encouraged. The impact of the proposed development on the Existing Offsets shown in Figure 8.1 require further consideration. It is suggested the Potential Onsite and Potential Offsite Locations; based on available mapping and database records, require further investigation to ensure the identified Onsite Offset lands provide suitable habitat for the required biodiversity offset requirements to be met, and confirmation of Offsite Offset lands be provided.

Air Quality

The air quality impact assessment provides limited detail to substantiate the statements made in Section 8.5.1 regarding the potential impact of dust emissions from the Eraring Ash Dam. The assessment relies on a Dust Emission Dispersion Study (AECOM, 2016) which has not been provided. The AECOM (2016) report should be supplied and considered in whole to support statements made regarding peak dispersion impacts over Rathmines, Balmoral, Buttaba, Arcadia Vale and Wangi Wangi.

It is suggested that time series data from the four depositional dust gauges maintained under EPL 1429 be considered (e.g. time series plot for each monitoring location) including information on the proportion of dust attributable to the ash dam. This should also clarify the maximum total increase in the area of un-rehabilitated ash dam exposed to air at any one time as a result of the Ash Dam Augmentation Project.

Section 8.5.2 refers to a 2017 Ash Dam Management Strategy (Origin, 2017) which appears to be in draft form. Should this document be in draft it is recommended to ensure controls outlined are being, or able to be, implemented in accordance with the strategy.

The mitigation measures for air quality impact put forward in Section 8.5.3 include a commitment to 'progressive rehabilitation of completed surfaces'. It is requested that a rehabilitation plan for the augmented ash dam be made available for review by Council.

Conclusion

Council raises no objection to the proposed augmentation of the Eraring Power Station Ash Dam, however the issues raised above require further consideration to ensure that impacts to the environment are acceptable.

Should you require further information, please contact the undersigned on 4921 0399 or by e-mail on gmathews@lakemac.nsw.gov.au.

Yours faithfully

A handwritten signature in black ink, appearing to read 'G Mathews', with a long horizontal stroke extending to the right.

Glen Mathews
Development Planner
Development Assessment and Compliance