6 February 2018

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The Executive Director
Resource and Energy Assessment
Planning Services
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Meghna D'souza

Dear Ms D'souza

Re: Submission on Clean Teq Holdings – Sunrise Nickel/Cobalt Mine – Modification Application No. 6

Thank you for the opportunity to make a submission to the Department of Planning and Environment on the accommodation camp Modification Environment Assessment submitted by Clean Teq Holdings for the Sunrise Nickle/Cobalt Mine (formerly Syerston Mine) in Lachlan Shire Council LGA approximately 45 km north east of Condobolin.

Council Officers have reviewed the environmental assessment and offer the following comments for the Department's consideration;

1) Roads

- a) the proposed modification to the accommodation camp will increase the number of light vehicle movements along haul and non-haul roads. This should necessitate a review of the Draft Road Transport Assessment to include the impacts of this change on local and regional roads.
- b) It is noted that Sunrise Lane has been included in the Modification for reconstruction as a gravel sheeted road. Lachlan Shire Council (LSC) seeks confirmation that this will form part of the road upgrade package. Further, subject to the review of the Draft Road Transport Assessment, LSC considers that Sunrise Lane should be constructed and bitumen sealed.
- c) The proposed relocation and increased capacity of the accommodation camp will result in a significant increase in traffic volumes during the construction and operational phases on the project. This is particularly relevant in Wilmatha Road where the increased traffic conflict raises serious traffic safety concerns around dust issues if the development is approved without a requirement to upgrade and bitumen seal the roads.

d) The above points should be considered in a review of the Draft Road Transport Assessment and LSC considers that all required road upgrades should be completed prior to construction activities commencing on the development.

2) Water

The proposal introduces an additional private water pipeline to service the accommodation camp which has not previously been considered. The pipeline will cross the Wilmatha Road reserve and a licence agreement should be negotiated between LSC and the applicant to protect the interests of both parties.

3) Waste

The Modification Environmental Assessment does not consider the important issue of waste management generated by the increased capacity of the accommodation camp. It is considered that a Waste Management Strategy should be developed by the applicant to address all waste management issues associated with the development. The strategy should be submitted for the consideration of the Department and LSC and any necessary waste facility upgrades including transport impacts should be addressed in the modification approval.

4) Voluntary Planning Agreement

The proposed modification impacts on the scope of the current VPA negotiations regarding the VPA under modification 4. Would the Department and Applicant please advise Council whether Modification 6 changes are to be included in the current negotiations or will they be considered in a separate negotiation at a later date?

If you have any queries regarding these points, please do not hesitate to contact me on 02 6895 1950.

Yours Sincerely

Greg Tory
Director

Environment and Projects