

To whom it may concern
Department of Planning and Environment

Re: Cadia East Modification 6 – Processing Rate Increase (06_0295 Mod 6)

This submission has been prepared by and on behalf of Orange city Council. After review of the documents relating to the above modification and having regard to comments expressed by members of the public to Council and reports in the local media we offer the following advice.

There has been some community concern surrounding potential impacts upon groundwater and surface water resources. It is noted that the proponent is not seeking any additional water licences and is confident that existing storages and supplies combined with the extensive water recycling undertaken are adequate to meet the projects revised needs.

We note the projected lifespan of the proposal is 29 years and the potential for one or more pronounced droughts during this period is therefore significant. Council seeks to ensure that water security for the broader community, agriculture and ecological services are prioritised during such periods.

This should pose no concern for the operator given their stated view that existing arrangements are adequate.

It is noted that noise impacts arising from the modification would be in the form of increased duration, rather than volume. The suggested mitigation measures in section 4.1.3 are supported by Council and the Department are encouraged to review existing conditions of consent to ensure the measures are applied.

It is noted that the modification is anticipated to result in an increase of total suspended particulate (TSP) emissions of approximately 2.4%. Greenhouse gas emissions are also projected to increase as a result of the modification. Direct (scope one) and indirect (scope two) are stated to rise by 5.6% and 2.4% respectively. The scale of these increases for both TSP and greenhouse emissions is considered to be moderate and, subject to mitigation measures proposed in section 4.2.4, within the bounds of acceptability. Again the Department are encouraged to review conditions of consent in this respect.

The projected increase in traffic arising from the construction phase of around 20 employees and a further 18.5% increase in heavy vehicle movements from the operational phase are likely to have a minor impact on traffic levels, however the increase in heavy vehicle movements is pronounced and likely to increase the frequency of road maintenance along the heavy vehicle route. The Department are encouraged to discuss this aspect with Councils and the RMS prior to the issue of a consent to ensure that the increased maintenance costs are appropriately managed.

Having regard for the important contribution that the mine makes to the region's economy and employment options, as well as the volatility of commodity prices, Orange City Council recognises the operators need to adapt to changing circumstances to ensure long term viability. It is considered that the modification has identified and addressed all relevant potential impacts arising from the modification and that any such matters can be accommodated through appropriate conditions. On this basis Orange City Council has no objection to the modification as proposed.

Regards

David Waddell

Director Development Services