



Broken Hill City Council

... a safe, vibrant, prosperous and culturally rich City achieved through community leadership and sustainable management.

Quote No

L14/467 - 11/192

Telephone / Personal Enquiries
Ask For **Mr. P. Oldsen**

Please address all communications to:

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February 25, 2014

Elle Donnelley
Planner
Mining & Industry Projects
NSW Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Elle,

Submission in relation to EA modification Rasp Mine PA 07_0018 Mod 2

Broken Hill City Council would like to make the following submission in relation to this modification.

1. Compliance with Project Approval MP 07 0018.

There would appear to be a number of conditions and commitments that may remain outstanding in relation to this project. No specific details in relation to these matters have been provided in the modification documentation. A full assessment of current status of all conditions and commitments should be provided in the modification along with previous environmental management performance since commencement of operations, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice should be included. The general principle that modifications should not be considered unless compliance and environmental performance can be validated and environmental impact is minimal.

2. Noise Impacts

It is noted that the filtration shed has been excluded from the results and predictions. Concerns are raised in relation to the potential cumulative impacts of inclusion of this noise source. It would also appear that the residences in Proprietary Square have not been considered in this assessment and concerns are raised in relation to the impacts on these residences and the residences located in Crystal St and Argent Lane which are included within the 40 dB(A) contour.

3. Road Transportation of Ore

The transportation of ore via trucks would appear to be inconsistent with the aims of State Environmental Planning (Mining, Petroleum Production and Extractive Industries) 2007 in that Regulation 16 requires consideration of the following:

16 Transport

(1) Before granting consent for development for the purposes of mining or extractive industry that involves the transport of materials, the consent authority must consider whether or not the consent should be issued subject to conditions that do any one or more of the following:

(a) require that some or all of the transport of materials in connection with the development is not to be by public road,

(b) limit or preclude truck movements, in connection with the development, that occur on roads in residential areas or on roads near to schools,

(c) require the preparation and implementation, in relation to the development, of a code of conduct relating to the transport of materials on public roads.

Should transportation via the public road network be approved it is requested that the following conditions be applied.

- a) That a full noise assessment for the operational hours of transportation be carried out for a 7 day period, conducted by a recognised independent noise consultant to verify that the predicated noise impacts are within the parameters indicated in the ECFN guidelines at the most sensitive receptors along the transportation routes. Fully laden and empty trucks shall be assessed separately and in combination. That any steps necessary to achieve the required noise levels shall be undertaken including modification of hours, vehicles and or buildings/structures.
- b) That a road maintenance agreement with Broken Hill City Council be entered into prior to commencement of transportation in relation to the contribution for maintenance costs and works to be carried out.
- c) That all loads be securely covered at all times during transportation to prevent any contamination of the road transportation routes.
- d) The installation and use of automated truck wash be installed at the final processing site to prevent re-contamination of the truck through the unloading process and prevent contamination of the road transportation route.
- e) That a communication and consultation strategy be developed and implemented with owners and occupiers all affected premises along the road transportation route.
- f) That all heavy vehicles used for transportation be fitted with the "Intelligent Access Program". That regular transportation reports be published in relation to frequency, hours of operation, number of vehicle movements and other compliance issues.

- g) That a Driver Code of Conduct be developed to include but not limited to:
- i. Comply with all RTA regulations regarding speed, load limits and driving hours;
 - ii. Ensure that all loads are correctly covered and sealed before leaving the Project Site;
 - iii. Limit the use of the engine brake and other noisy driving practices in built-up areas;
 - iv. Show courtesy to all road users at all times;
 - v. No parking whilst enroute between the mine site and the final processing destination.

Should any matter require clarification please contact the undersigned in the first instance.

Yours faithfully



P. OLDSSEN
GROUP MANAGER SUSTAINABILITY