

# Submission on the Ventilation Shaft Modification Application

This submission provides comments on aspects of South32's Modification Application (Mod 3 – Appin Mine Ventilation and Access Project) for the proposed ventilation shaft at Menangle of relevance to the responsibilities of Council including community advocacy. The existing operations are associated with the Bulli Seams Operations Project, otherwise known as the Appin Mine. The Project would include the construction and operation of the following key infrastructure:

- One downcast ventilation shaft (to be known as Ventilation Shaft 7).
- One upcast ventilation shaft (to be known as Ventilation Shaft 8) and associated extraction fans.
- Mine access facilities (including a winder and headframe) within Ventilation Shaft 7.
- Associated ventilation and mine access infrastructure and facilities.
- Sedimentation ponds.

This submission provides comments on the following referred documents associated with the Modification Application that were placed on public exhibition through the NSW [Major Projects planning portal](#):

- Appin Mine Ventilation and Access Modification Report
- Biodiversity Development Assessment Report (BDAR)
- Noise Management Plan
- Traffic Management Plan
- Air Quality Assessment

This submission contains two parts, comprised of Part A which provides comments on the position of Council on key aspects of the Modification Application while, Part B provides comments on aspects of the submitted documentation of relevance to Council's responsibilities. A key focus of the comments relate to feedback received by members of the community over the ventilation shaft since it was first publicly proposed during 2015.

## PART A: GENERAL COMMENTS ON THE VENTILATION SHAFT APPLICATION

### 1) Overview of Council position on the Ventilation Shaft

The Modification Application is understood to relate to conditions within the Determination for Bulli Seam Project issued in December 2011. Council's broad position on this Project as expressed in mining related submissions is that Council recognises the employment and economic contributions of mining and is generally supportive, provided impacts to natural and built features are not significantly adversely affected and are adequately managed.

The stated grounds for the installation of the Shaft and the need for its location in the vicinity of Menangle in the Modification Report as part of the overall operation of the Bulli Seam Project is recognised. It is requested to be noted however that the short timeframe required for provision of comments has prevented the opportunity for a formal Council position on the Modification Application. Therefore, this submission is to be viewed as a staff submission. Within this context, the proposed development is not opposed provided potential impacts are adequately assessed and managed and there is sufficient community engagement and response to community concerns at all stages of the Project.

## **2) Adequacy of the Modification Application documentation**

The submitted documentation has been reviewed by a number of Council staff with technical expertise in regard to various aspects of the Modification Application including; biodiversity, noise and traffic management. The key issues based on this review consistent with issues raised in previous applicable Council submissions are:

- The response to previously raised community concerns (largely in regard to noise, air quality and visual aspects) and ongoing engagement.
- The consideration of traffic management implications associated with the Project consistent with Council requirements.
- An adequate assessment and management of potential impacts to biodiversity and water sources (surface and groundwater) including nearby bores on rural properties.

Aspects of the Modification Application documentation that are supported, with the above listed key issues in mind, include:

- The location of the site to minimise impacts to biodiversity,
- Intended measures for treatment and recycling of produced water output,
- The inclusion of air quality and traffic management assessment and modelling,
- The extent of community engagement by South32 with nearby residents and landholders is also supported and welcomed.

However, this submission requests the undertaking of a groundwater assessment to identify potential impacts to groundwater sources within a localised context based on specialised advice received by Council staff. Council expresses concern over the absence of such an assessment. It also requests the undertaking of an independent peer review of the Air Quality Assessment given the specialised nature of this field and to ensure its transparency and adequacy in responding to community concerns raised.

In addition, this submission also provides comments and recommendations to address considered shortcomings in aspects of the Modification Application identified by staff with technical expertise. These recommendations are provided in the form of suggested conditions of consent for inclusion in the Modification Application Determination.

**The provision of a response detailing comments received from other stakeholders on the above issues and their consideration during the review and preparation of the Determination to Council would be appreciated.**

## **3) Community consultation associated with the Modification Application**

Council has received community feedback on a range of different options for a ventilation shaft in the vicinity of Douglas Park since it was first proposed in approximately 2014. Council, at its meeting of 21 September 2015 resolved in relation to this matter:

- *That Council continue to monitor the Douglas Park Mine Gas Drainage and Power Plant Proposal by South32 and that Council continue to engage with residents of Douglas Park regarding their concerns about the proposal.*
- *That Council throughout the process, advocate on behalf of the community, communicating their concerns to the consent authority, our state member, mining authority, and any other applicable minister/authority*

The communication engagement section of the Modification Report was reviewed by Council's Community Engagement team who expressed the view that a genuine effort consistent with good practice has been made to ensure the community is kept up to date on the project, (as

well as offering the opportunity to be part of an advisory panel). However, the following concerns over the approach of the community engagement were raised:

- The community engagement both undertaken and proposed is more like communication (informing), and consultation with a view to identifying concerns in order to provide relevant information, rather than involving the community in decisions.
- The Community Engagement Section also seems more focused on outputs rather than explicitly showing how community concerns were addressed (recognising there are tables present which categorise issues raised through the engagement).

The inclusion of intended procedures to inform the local residents during the construction and operation of the ventilation shaft is welcomed. **The Department of Planning Industry and Environment (DPIE) is requested to require the development and implementation of a community engagement strategy that applies to the construction and operation of the ventilation shaft and addresses the above issues relative to the Project's engagement.**

In relation to this matter, it is recognised that direct community consultation has been challenged by current COVID- 19 restrictions. However, it is recommended that DPIE request that South32 hold an on-line forum that would enable a more comprehensive understanding of community sentiment and provide enhanced opportunities for increased community feedback on the proposed Project. Tahmoor Colliery were noted to have held a similar style forum for Tahmoor South during the previous period of tight COVID-19 restrictions.

## **PART B: COMMENTS ON ASPECTS OF THE MODIFICATION APPLICATION**

### **1) Description of the Project**

The provision of specific comments on technical details associated with this Application is outside the scope of this submission. It is however recommended that the DPIE include a condition/commitment that requires investigation of the capture of emitted gases from the shaft as part of the Bulli Seam Project. The Air Quality Assessment Report is noted to refer to this Project but not provide any detail over any intended capture as part of the operation of the Shaft.

### **2) Potential impacts to the surrounding landscape**

Council's Draft Scenic Landscapes Study and Management Strategy includes actions to conserve, maintain and enhance areas of the Wollondilly Local Government Area with identified landscape values. The site of the proposed ventilation shaft is within a landscape unit identified by this Strategy as having open pastures with scattered trees and rural buildings, broken up by low ridge lines and framed by hills and ranges, with often expansive views. The ventilation shaft is not included on the list of developments identified by this draft Strategy as being out of character with this landscape unit.

The draft Strategy contains recommendations for the landscape unit applying to the site that is of relevance to the ventilation shaft: *"Ensure mining and extractive industry activities and infrastructure are well-screened from surrounding areas and the scenic river landscapes in particular. Ensure that screening is provided in a manner consistent with the natural landform and vegetation"*. The proposed screening by the Modification Application is recognised as having consistency with this recommendation. **The DPIE is requested to ensure that the consent condition relative to the landscaping screening requires specific reference to this recommendation of Council's Draft Scenic Landscapes Study and Management Strategy.**

### 3) Potential impacts to biodiversity

The following comments relate to Section 2.2.5 of the Modification Report and the Biodiversity Development Assessment Report (BDAR) based on the Biodiversity Assessment Methodology (BAM), the associated Operational Guide as well as the Council officer knowledge of the site. The comments provide requested amendments that are designed to enhance the quality of the document in terms of identifying and managing impacts to biodiversity as well as to ensure consistency with the BAM.

Section 3.2.5 of the BDAR is noted to state “*Management and mitigation measures to be implemented during the construction and operational phases of the Project will be documented within the Biodiversity Management Plan (BMP) or relevant management plans to be developed for the Project*”. It is further noted to state that “*a BMP has been developed for the BSO and will be reviewed/updated accordingly to include the subject land (IMC 2019)*”. It is **requested that the DPIE require as a condition of consent that the BMP be required to be updated to incorporate the ventilation shaft and recommended amendments to the BDAR contained in this submission prior to the commencement of any works.**

#### (i) Identification of Biodiversity Values (Section 2: Landscape Values)

The surveys of threatened flora and fauna viewed as being sufficient and consistent with the BAM. However, it is noted that only a general assessment of the presence of potential threatened species on the site has occurred. It is therefore requested that the Determination require targeted surveys of all threatened flora and fauna species with identified high likelihood of occurrence on the subject site based on Tables 4, 5 (flora) and 10 (fauna) within the BDAR. Council request that targeted surveys for Cumberland Plain Land Snail are also undertaken at the base of mature trees and in areas of the site supporting woody debris/litter cover, despite the assessment of likely habitat as low in the BDAR.

The methodology and survey approach for classification and defining of ecological communities adopted by the BDAR including numbers of plots and separation into vegetation zones is viewed as being consistent with the BAM. However, it is apparent that the BDAR has separated grassland as a separate subunit of Cumberland Plain Woodland (CPW) rather than incorporate any areas satisfying definition of Derived Native Grassland into the mapped occurrences of this ecological community on the site. The Biodiversity Assessment Methodology Operational Manual Stage 1 states in relation to this matter “*the assessor should compare the PCT description to that of the NSW Scientific Committee Determination, which describes the community composition of a likely TEC*”. **The DPIE is requested to require that the updated Biodiversity Management Plan include updated mapping that depicts any identified areas of DNG based on the NSW Scientific Determination for CPW**

The BDAR states “*No threatened flora were recorded within the subject land*” and “*no threatened flora are considered to have a moderate or higher likelihood of occurrence in the subject land*”. However, Table 5 identifies that targeted surveys are required for at least two flora species (Downy Wattle and Spiked Rice-flower). A requirement for surveys of these species as part of the implementation of the Biodiversity Management Plan is requested if they have not already occurred.

#### (ii) Identification of impacts and avoidance measures (Section 2: Landscape Assessment)

##### Direct impacts

The listing of direct impacts to ecological communities from the proposed project based on the mapping within the BDAR is agreed with. **However, it is recommended that the calculated area of directly impacted grassland be updated to be apply any areas of identified Derived Native Grassland that should be presented as part of the direct impact to this ecological community consistent with comments above.**

#### Indirect Impacts

The list of indirect impacts from activities associated with the development during construction and operation of the ventilation shaft within the BDAR are agreed with in principle. It is however considered that the BDAR has not sufficiently identified indirect impacts on native vegetation associated with weed invasion and from increase in human activity as a consequence of the proposed development. It is requested that the mitigation measures be required to be implemented by the Biodiversity Management Plan.

The requested requirements for the Biodiversity Management Plan for each of these indirect impacts is provided in Table 1.

**Table 1: Requested response in regard to key indirect impacts**

Indirect impact	Comment in the BDAR	Requested amendment by DPIE
Weed invasion	Likely level of impact is low. The area is already highly weed infested.	The updated site specific Biodiversity Management Plan be required to contain a weed management treatment plan.
Increased human activity within or directly adjacent to sensitive habitat areas	Likely level of indirect impact is high. The CPW present beyond the construction footprint is a sensitive habitat area.	The comment in the BDAR is agreed with. The comment is however viewed as highlighting the need for a site specific Biodiversity Management Plan given the Critical Endangered status of CPW. It is also recommended that impacts from surface spray irrigation are assessed and managed.

#### *(iii) Avoidance and mitigation measures*

The statements within the BDAR that avoidance measures have been implemented through the site selection and design of the ventilation shaft facility are agreed with in principle. **It is however recommended that the adjustment of the development footprint be investigated to avoid direct impacts to any areas of Derived Native Grassland identified from the requested analysis referred to above (in regard to the identification of biodiversity values).**

The listed measures in Table 13 of the BDAR to mitigate impacts to biodiversity values are supported in principle. However, the following additions, commonly used in Council issued Determinations, are requested to be required as part of the implementation of the recommended site specific Biodiversity Management Plan:

- Targeted surveys of all threatened flora and fauna species mentioned previously.
- A one page Translocation Protocol for the relocation of any identified Cumberland Plain Land Snails to the nearest suitable habitat.
- Measures for the protection of retained trees and protocols to be followed for the relocation of any fauna identified in any hollows within the trees to be removed.

#### *(iv) Management of riparian corridor vegetation*

The BDAR is noted to state that there is a linear strip of riparian forest lining Foot Onslow Creek near the northern boundary of the site that is dominated by the introduced Peppercorn Tree (*Schinus molle*). The vegetation adjacent to this creekline is recognised as having low diversity and dominated by exotics.

However, the enhancement of the condition of this vegetation is viewed as important in providing a mechanism to improve the condition of the creekline as well as monitor and address any identified impacts associated with the vegetation shaft during and subsequent to construction. Such an approach is viewed as being consistent with Council's adopted Integrated Water Management Strategy which can be viewed on its website at <https://www.wollondilly.nsw.gov.au/environment-biodiversity-and-sustainability/water-management/integrated-water-management/>.

**It is consequently requested that DPIE require that the site specific Biodiversity Management Plan include a Vegetation Management Plan either within or as an appendix that would apply to PCT 835 – *Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion* as mapped in the BDAR as well as the adjacent creekline.**

#### **4) Potential impacts to water sources (surface and groundwaters)**

The adequate management and protection of waterways is a high priority to Council and the local community. This priority is reflected by the inclusion of 'Valuing the Ecological Health of Waterways' Priority Theme in Council's adopted Local Strategic Planning Statement (LSPS). It is also reflected in the recently adopted Integrated Water Management Strategy and Policy for Wollondilly that has a key objective of "*no adverse impact from development on the condition of water sources*". While recognising the Modification Application is approved under state level planning framework, Council would expect that the Development have broad consistency with its Integrated Water Management Policy.

The following provides comments in regard to the considered adequacy of the identification and management of potential impacts to water sources (including private bores) and requested DPIE response to address identified shortcomings.

##### *(i) Potential impacts to groundwater sources (and interconnecting surface waters)*

The Modification Application is recognised as not applying directly to mining operations and the associated impacts to groundwater (and surface) waters documented in a range of environmental assessments and research studies. However, the Project Description in Section 3.7 of the Modification Report is viewed as indicating potential interaction with groundwater sources during the installation and operation of the ventilation shaft.

The following provides an overview of the review process adopted, identified potential impacts of the installation of the shaft on groundwaters and interconnected surface waters (including farm dams), and requested DPIE response.

##### Potential impacts during establishment of the shaft

The Modification Report is noted to indicate a recognition of the potential for impacts on geological structures and groundwater during the installation (sink) of the shaft. However, the wording in relation to the extent and likelihood of impacts within the Modification Report is viewed as being generic in nature. For example, the "*Project is unlikely to impact groundwater systems and at the substantial depths of cover in the Project area*" and "*connective cracking from the ground surface to the mined coal seam is not expected*".

The Modification Report is noted to state in relation to this matter that “*potential impacts to groundwater from the Mine have been assessed as part of the EA*” (assumed to be for the Bulli Seam Project) and “*it is unlikely that the Project would cause impacts to groundwater aquifers greater than those already predicted in the EA*”. The DPIE is requested to note a level of concern by Council staff that the Modification Application does not include a site specific assessment of potential impacts on the local groundwater environment during the establishment and operation of the Ventilation Shaft that could be based on the Bulli EA.

Advice was sought from a structural geologist who is co-author of a draft *Characterisation and Modelling of Geological Fault Zones Guidelines* recently exhibited by the Independent Expert Scientific Committee during the preparation of this submission given the highly specialised nature of hydrogeology. This geologist advised that the application should contain a groundwater analysis with the following components to enable the consent authority to adequately carry out its statutory responsibilities:

- A study of the existing fracture network and groundwater environment in the immediate vicinity of the site to the full depth of the ventilation shaft.
- The potential for the sinking of the shaft to enhancing existing geologic fractures or create new fractures.
- The potential for groundwater to migrate through any enhanced fracture network including any pathway for its upward migration as a consequence of dewatering operations during the installation and operation of the ventilation shaft.
- The potential for impacts to shallow groundwater sources and any interconnected surface waters identified from the above analysis.

It is understood that DPIE Water are being contacted as part of the targeted consultation process, who may provide comments of relevance to groundwater impacts associated with the development. **However, this submission requests that the Determination require the completion of a satisfactory detailed groundwater study (based on the above received specialist advice by Council), as well as other received specialist advice prior to the commencement of any works. In addition, this submission recommends that the groundwater assessment consider the draft *Characterisation and Modelling of Geological Fault Zones* referred to above.**

(ii) *Potential implications to private bores and farm dams*

There are a number of known bores within the vicinity of the site that are relied upon for agricultural activity and provide habitat for a range of fauna species. In addition, an analysis of Council’s GIS system has identified an additional 10 farm dams downstream that are in addition to the five farm dams upstream of the ventilation shaft site noted to be referred to in the Modification Report.

The reference and consideration of potential implications of the ventilation shaft to both private bores and farm dams within the Modification Report is welcomed. However, there is considered insufficient basis for the noted conclusion of the Report “*registered groundwater boreholes would not be impacted by the Project*” in the absence of the site specific groundwater assessment requested above. **The DPIE is consequently requested to require as a condition the (requested) site specific groundwater assessment consider potential implications of the installation and operation of the ventilation shaft on private bores and farm dams in the vicinity of the site.**

(iii) *Potential impacts to surface water sources and their intended management*

The proposed approach for managing treatment and stormwater flow on the site has broad consistency with Council's Integrated Water Management Policy and Strategy and is supported in principle. However, the Modification Report is noted to state in relation to this matter "*Potential surface water and soil impacts during the operation phase will be managed in accordance with the existing Appin Mine Surface Water Management Plan (Appin Water Plan), which will be updated to include the Site*". The Report is further noted to state "*relevant environmental management plans will be developed to address potential impacts specific to the construction phase of the Project*". Council Staff have concerns over the adequacy of this approach in providing a sufficient water management framework given the questionable direct applicability of the Appin Management Plan to the ventilation shaft site.

Council's submission on the Appin Mine Operation Plan dated July 2020 requested that a future ventilation shaft at Douglas Park be the subject of a detailed environmental assessment that is supported by sufficient baseline data. **It is requested (consistent with this previous submission) that the Determination require a site Water Management Plan that specifically applies to the site that could be based and/or have consistency with the Appin Mine Surface Water Management Plan.**

(iv) *Onsite sewage management*

The project site is not located within the Sydney Water reticulated sewer network and as such will have to rely on on-site sewage management. It is noted that a bath house and staff amenities will be installed on the site as well as a proposed sewage treatment plant with surface spray irrigation. There is however a considered absence of a wastewater report associated with these activities as site plans showing the location of any on-site sewage management system or related effluent disposal area. It is considered important and requested that the DPIE require this information prior to Determination given the large areas of hard surface site coverage and proximity to Foot Onslow Creek.

NOTE: Sydney Water's preliminary feedback that there is no spare capacity to supply reticulated drinking water supply to the site and that the application is reliant on this becoming available into the future. Where it is intended to provide temporary supply by way of water cart from ventilation shaft 6, a Private Water Supply - Quality Assurance Plan will need to be lodged with NSW Health. Any recycled water should be managed in accordance with the risk management framework as outlined in the Australian Guidelines for Water Recycling: Managing Health and Environmental Risks, Phase 1, National Water Quality Management Strategy 2006.

## **5) Air Quality and Greenhouse Gas Assessment**

(i) *Air quality considerations*

Air quality impacts has been the dominant issue raised by local residents in feedback received to date regarding the proposed ventilation shaft. Detailed comments on the technical adequacy of the air quality assessment and modelling are not provided by this submission due to its specialised nature and being outside the technical knowledge of Council staff.

As a broad position, Council would expect that concerns raised by the local community regarding air quality be adequately addressed during the assessment, construction and operation of the ventilation shaft. Council would also expect as a broad position that the installation of the ventilation shaft would not result in a net adverse impact to local air quality. This submission recommends that the DPIE arrange for an independent peer review of the Air Quality Assessment for the purposes of achieving transparency and demonstrated



consideration and response to community concerns over potential adverse impacts of the ventilation shaft to local air quality.

(ii) *Greenhouse gas assessment considerations*

Comments regarding the technical detail of the Greenhouse Gas assessment is outside the scope of this submission. The Statement within this Assessment that “*the Project will not increase the volume of coal produced, therefore there is no substantial increase in fugitive emissions generated by the Mine as a result of the Project*” is however questioned on the following grounds within the technical expertise of Council staff:

- The commissioning of the Shaft will result in fugitive emissions (from underground coal mine operations) in accordance with its stated purpose.
- The recognised definition of fugitive emissions applies to leakages and not greenhouse gas emissions (Scope 1, 2 or 3).

**The DPIE is consequently recommended to seek specialist advice regarding this matter prior to Determination and require any updating of the calculated greenhouse gas emissions identified as being appropriate based on this advice.**

**6) Noise Impact Assessment**

The report has used a British standard BS 6472:2008-2 for human exposure to vibrations whose relevance to NSW conditions is uncertain. The Assessment is noted to indicate that overpressure due to blasting operations exceeded AS2187.2-2006 at 9 sensitive receivers. The applicable ANZEC guidelines for such operations are applicable during the hours of 9am and 5pm. In the absence of Australian Standards for overpressure or vibration criteria on human health, there are concerns over the potential for approval of blasting operations during night time hours. **It is consequently recommended that DPIE issue a condition that permits blasting during day time hours only.**

The proposed development of a Blast Management Strategy in consultation with relevant stakeholders and reviewed by a suitably qualified and experienced person is agreed with. It is assumed in this regard that consultation with receivers identified as potentially affected would occur throughout all phases of the blasting program. **It is requested that the DPIE require that blast monitoring be carried out in accordance with the guidelines provided in Australian Standard 2187.2-2006: Explosives – Storage and use, Part 2: Use of explosives (AS 2187.2-2006) and by a specialist consultant as a condition of consent. It is further requested that DPIE require the installation and implementation of an automated monitoring system that allows for the instant and automatic uploading of collected data to a central server.**

**7) Traffic Management**

The following comments and recommended conditions are provided by Wollondilly Shire Council's Assets, Transport and Engineering team following a review of the project proposal and Traffic Management Assessment.

(i) *Specific road design issues*

The provision of a site access intersection on Menangle road is generally acceptable. There are concerns on the exact intersection location and road safety and the maintenance and operation burden of the intersection in the long term to Council. A detailed design and construction phase review and approval stage should be conducted with Council prior to development works on site commencing. The developer should be responsible for providing

maintenance of the intersection during the development's construction phase and for providing a plan for the decommissioning of the intersection in the long term.

There is limited details on the proposed road property widening required for the intersection. A detailed plan should be provided on any road widening proposed or the arrangements to be made for the placement of public infrastructure on private land.

(ii) *Recommended conditions for the Determination*

It is requested that the development be managed, through conditions of consent similar to the following, to ensure Council is given suitable opportunity to review and approve all public road assets proposed with the development:

- An environment impact review shall be undertaken for the construction of the site access intersection, to the satisfaction of Council's Manager of Assets, Transport and Engineering (as well as Council's Environmental Services Section).
- Consultation must be undertaken with Council's Manager of Assets, Transport and Engineering to determine the final location of the proposed site access intersection. The location should be investigated with consideration of sight distances, traffic speeds, volumes and a Road Safety Audit. Design reviews should be conducted at approximately 20% and 80% completed design stages.
- To ensure traffic is adequately managed during the construction phase of the development, the construction of the Ventilation Shaft should not commence until a Certificate of Practical Completion for the site access intersection is issued by Council. The design and construction of the intersection shall be managed through a Road Management Permit under section 138 of *The Roads Act* and issued by Council.
- A Traffic Management Plan shall be prepared, to the satisfaction of Council's Manager of Assets, Transport and Engineering, that outlines:
  - a. Measures to be implemented for clearing of construction debris, mud or other loose material that may be tracked on to the intersection and adjoining road networks during construction and operation of the development.
  - b. Measures to be implemented for clearing and management of roadside vegetation to may reduce Menangle Road sight lines to the intersection.
  - c. Measures to be implemented to ensure the intersection pavement, lighting and delineation is maintained throughout the construction phase of the development.
  - d. A suitable construction traffic Complaints Register and Action Plan.
  - e. A suitable Intersection Decommissioning Plan at the completion of the high traffic volume construction phase of the development. Approximate dates and actions for decommissioning shall be detailed.

## **PART C CONCLUDING STATEMENT**

The stated grounds in the Modification Report for the installation of the Ventilation Shaft as part of the overall operation of the Bulli Seam Project, and the need for its location in the vicinity of Douglas Park, is recognised. The proposed development is not opposed provided potential impacts are adequately assessed and managed, and that there is sufficient community engagement and response to community concerns at all stages of the Project.

This submission provides support to aspects of the Modification Application. However, it requests a site specific groundwater assessment prior to any works commencing based on received specialised advice given the potential for this water source to be impacted and absence of such an assessment within the Application. It also seeks an independent peer

review of the Air Quality Assessment. It also provides a range of recommended conditions for inclusion in a future Determination in regard to biodiversity, surface water management, potential noise impacts and traffic management.