

103724:LAS



20 October 2020

Andrew Rode
Department of Planning, Industry and Environment

Submitted via NSW Planning Portal – Major Projects

Dear Andrew,

RE: SSD Modification (DA504-00-Mod-6) - Clarence Coal Reject transfer

Thank you for the opportunity to review and comment on this project. On behalf of Lithgow City Council I advise that no objections are raised from an environmental planning perspective and the relevant ecological, social and economic effects of the proposed modifications have been adequately addressed.

Following an overview of the submitted documentation, I would like to draw the Department's attention to the following matters as relevant for emphasis in the assessment of the proposal:

- Increased train movements will be minimal (1 movement in each direction per day between the sites), however, it is indicated the likely time for these movements will be mid-morning and mid-afternoon by a train up to 500 metres long. It is noted from the submitted documentation the increased impacts from these impacts on local traffic movements and level crossings will be minimal and acceptable. Council accepts this conclusion but would like to request further consideration to avoid train movements around peak traffic times, or if this cannot be avoided, to limit the maximum length of trains to minimise impacts on traffic circulation in local communities during high demand traffic periods.
- The repurposing and reuse of the CCR from Clarence at Charbon is supported and is considered generally to be a sustainable use of resources. It is understood the CCR is surplus to needs at the Clarence site and is not needed for future rehabilitation of that site (with the majority of works being undertaken below ground). Council would like to emphasise that the relocation of CCR material to Charbon should not unnecessarily reduce any filling materials required for the future rehabilitation of the Clarence site and thus result in potential cumulative impacts resulting from the need to import fill materials to Clarence to compensate for the relocated CCR.
- It is noted from the supporting documentation that the CCR is to be transported in uncovered rail containers (see section 4.13 of the EIS). Council would like to ensure that all necessary precautions are in place to prevent and avoid unnecessary and unreasonable movement and discharge of dust and CCR particles from the rail cars during their movement between Clarence and

Charbon. It is requested that the CCR material be sufficiently washed, stabilised, contained and covered prior to its movement from the Clarence site.

Please contact me if you require any further clarification or information on the above.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Lachlan Sims', written in a cursive style.

Lachlan Sims
Acting Team Leader Development