

# CENTRAL DARLING SHIRE COUNCIL

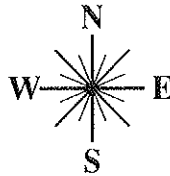
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22 July 2013

NSW Department of Planning & Infrastructure  
Senior Planner, Mining & Industry Projects  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam,

**Re: Submission – Atlas-Campaspe Mineral Sands Project (SSD-5012)**

Council would like to take this opportunity to raise a number of issues relating to the abovementioned mine and its impact on the Central Darling Shire Council. Council has previously lodged a submission with regards to the project; however that submission was a generalised approach to the project as a whole. This submission proposes to focus on the impacts as they relate to Central Darling Shire Council specifically. It is accepted that many of the matters raised in its previous submission have not been dealt with prior to the Environmental Impact Statement being placed on public view, however following discussions with the proponents consultants, it is accepted that these matters will be subject to ongoing negotiation; conditions and licenses.

**Note:** A copy of the previous submission is attached for your information.  
(Attachment A.)

**Road Transport**

Many of the issues of road transport have not yet been finalised. Council would oppose granting of approval to operate the mine until these matters have been satisfactorily addressed or a planning agreement has been entered into, however to date discussions with Cristal have commenced in this regard.

The Environmental Impact Statement has assumed that roads are sufficient for heavy haulage based on their classification for road trains. No information has been provided on the impacts of the additional haulage on the existing and proposed pavements. Failure to provide this information is a flaw in the Environmental Impact Statement and makes any deliberations as to the actual costs of maintenance difficult to quantify. Without this data, preparing and entering into Planning Agreements will be difficult to achieve as correct information is not yet available. Cristal has indicated they are willing to investigate the strength and adequacy of the pavement to address this matter.

The following are excerpts are from Council's engineering staff relating to the potential problems raised by this development:-

*CDSC consider the increase in the number and type of traffic generated by this proposal will have an adverse impact on the Ivanhoe Balranald Rd within the Central Darling Shire Council. These adverse impacts can be mitigated by appropriate arrangements being made to address these impacts by requiring works to be*

*completed by condition of consent or payment of monetary contributions towards these works.*

*The EIS submitted provides an assessment of the projected traffic increase with respect to increased vehicle movements and the type of vehicles (heavy haulage). The EIS states "No significant impacts on the performance, capacity, efficiency and safety of the local road network are expected as a result of the Project." The EIS also appears to conclude that only works necessary on the Ivanhoe Balranald Rd are those identified in the Road Safety Audit prepared by GTA Consultants.*

*CDSC strongly disagree with these conclusions. The expected increase in the number and type of vehicle movements will have a significant adverse impact on pavement performance and these impacts are not adequately addressed by the works proposed within the Road Safety Audit mentioned above. Notwithstanding this conclusion the anticipated adverse impacts can be adequately addressed.*

*It should be noted that the EIS provides no assessment with respect to the existing pavement strength of the Ivanhoe Balranald Rd and how the increased heavy haulage on this road by the proposed development will impact the existing pavement.*

*The Minister in the first instance should require an assessment of pavement strength along the entire transport route including an evaluation of the existing pavements capacity to accommodate the increased loading expected.*

*Alternatively the Minister could require works be undertaken and monetary contributions be made with respect to anticipated adverse impacts."*

#### **Gravel Resources**

Road building and repairs are problems in this region due to the lack of suitable resources such as gravel. No mention of the proposed source of these materials is mentioned. Demand for these limited materials could result in increased costs to Council when competing for limited resources. This matter still requires addressing.

#### **Stock Control**

Whilst this is an existing situation, the increased number of vehicular movements is likely to cause problems in future. The issue of fencing and stock control been revisited in the Environmental Impact Statement. A condition that the proponent enter into agreements with the relevant land holders to recompense them for stock losses would be acceptable.

#### **Waste Disposal - Accommodation Camp**

The camp is proposed to be erected on the mine site and as such is not in Central Darling Shire Council's jurisdiction. Concerns are raised however as to the methods of disposing of domestic wastes from the site. It has not been determined which disposal site will be used for waste disposal. Any proposal to dispose of these at Council's waste depot in Ivanhoe will create difficulties for Central Darling Shire Council. The need to plan for additional waste streams and the shortening of the waste depots working life as well as the cost of replacement need to be factored into any Planning Agreement to ensure suitable funds are available to maintain and replace the depot at the end of the current depots working life.

#### **MSP Wastes**

It is unclear how MSP wastes are to be returned to the mine. It states in the Environmental Impact Statement that these will be delivered by train to the Ivanhoe Rail siding for back loading to the mine site. It is also states that the wastes are to be in secure containers for transport due to the hazardous nature of the material. If in containers, the existing road trains are not set up for transport of these containers from the rail siding to the mine. Further clarification of this point is required prior to any agreements being adopted between Cristal and Central Darling Shire Council.

### **Ivanhoe Rail Siding**

There are references to the collection of water from rainfall events and the possible use of this water for dust control at the rail siding. Given the levels of rainfall and evaporation and infiltration rates for the site, the likelihood of water being available for this source throughout any given year is unlikely. If water is unavailable for the purpose of dust suppression, what alternative sources have been identified for the process? It is considered unlikely that the Ivanhoe water supply is capable of providing sufficient water for this purpose and the treatment plant would likely require upgrading to provide water even if it was available. Advice from the consultants indicates that no dust suppression would be required at the Ivanhoe Rail Siding and that dust monitoring will be undertaken. It is suggested that this be formalised as a condition of consent and that in the event that dust does prove to be a problem, that suitable dust suppression methodology be implemented.

Potable water supply to the facility may or may not be possible, however as the siding is approximately 4.5 kilometres from the town, who will pay for the cost of installing suitable water mains and will pressure be satisfactory for the purpose.

### **Construction Certificates or Complying Development Certificates**

Clarification of the proposed construction of amenities and office buildings at the Ivanhoe Rail Siding is required to determine the process for approvals. The use of private certifiers for this is acceptable, however if Council is required to undertake this function Council needs to be aware to allow for the organisation of staff to undertake this activity.

### **Traffic Control**

Reference is made in the Environmental Impact Statement to speed limitations to prevent damage to the "Mossgeil Daisy" population. How is this to be enforced and monitored to ensure that the species is not endangered? Also what methods are in place to ensure trucks using the roads are not overloaded or driven at speeds inappropriate to the conditions? What methods are to be put in place to deal with Council road closures due to wet weather conditions etc.?

Will the use of "Planning Agreements" provide a mechanism to allow for recovery of costs due to damage from inappropriate use of the roads in contradiction of Council road closures? It is suggested that this be formalised as a condition of consent and that a formal agreement regarding traffic movements and road repairs etc. be entered into by both parties.

### **Future Expansion Due to Transport of Ore From Additional Mines to Broken Hill**

Whilst it is a matter for future development, it has been indicated that other potential mine sites are present within the surrounding areas. It is assumed that these may be brought online at a future date to supplement dwindling resources at existing mines such as Snapper. If this occurs, it is understood that further planning approvals will be sought. It is considered prudent at this time to at least consider the potential for this development in overall planning for traffic movements and the life of the project.

### **Ongoing Discussions**

Council is aware that many of the issues relating to operation in the Central Darling Shire Council area can be resolved or at least mitigated by further discussions and the implementation of suitable "Planning Agreements". Despite this, Council is of the opinion that the approval, if granted, should also impose conditions of consent in relation to these issues so as to give them a more formal and legally binding nature. Details can then be included in the Planning Agreements to "fine tune" working arrangements between Cristal and the relevant Council's or authorities.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'Gordon Scott', with a stylized flourish at the end.

Gordon Scott

**Mandatory Inspections Officer**