6 April 2010

Mr K Winwood, Senior Planning Officer
Major Development Assessment, NSW Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Mr Winwood

Re: Recommendations for the Director-General's Requirements for
Environmental Assessment of the Dargue's Reef Gold Project

Please find below Council's recommendations to be included in the Director-
General's requirements for the Dargue's Reef Gold Project.

1. Road Access

There is a need to address pavement damage, road safety and traffic noise issues
that will arise from transport of resources to site and the haulage operations
from site. The EIS needs to indicate the number of vehicle movements for both
light and heavy vehicles, and identify the proposed haulage routes. The EIS
should indicate the route(s) of the haulage trucks after they reach the Kings
Highway at Braidwood.

Council expects the developer to address any impacts on Council owned and
maintained roads at no cost to Council.

Majors Creek Road pavement is relatively thin and increasing pavement failures
will occur from the heavy vehicle movements associated with the mine.

Majors Creek Road has a relatively narrow carriageway. Conflicts with haulage
trucks will occur especially on the more pronounced crests and over a narrow
culvert at about mid section. Some widening and line marking over the crests
would ameliorate the problem. Widening and/or better delineation/guardrail
are requested to address the narrow culvert.

The proposed intersection of the mine access road off Majors Creek Road will
need to be constructed to RTA standards and an additional acceleration lane is
requested for loaded trucks leaving the site up hill. The intersection of Majors
Creek Road with Araluen Road should be upgraded with an RTA BAR treatment
to make a safer intersection for the increase in traffic turning towards the mine.
Potential damage/wear and tear on other Council roads and/or MR92 (Nerriga Road) needs to be addressed in the EIS, with some assessment of the expected damage to pavements on the haulage routes and proposed the actions to address these.

Council proposes a planning agreement where impacts are identified and an amount is agreed and is paid up front for each year, so that Council can repair the damage when it occurs without bearing the expense of these repairs.

Further it is requested that the hours of haulage operations be restricted to daylight hours to avoid traffic noise at night, especially through Braidwood.

2. Community Benefit

The impact of the mine operations on the local amenity, especially the haulage operations through Braidwood, should be addressed by compensatory contribution towards better community facilities. In any case, many of the mine’s employees are likely to live in Braidwood and Majors Creek and increase the demand for public facilities. A formalised planning agreement is requested for payments to be paid towards identified community project(s).

3. Waste Disposal

No waste from the mining operation is to be taken to the Majors Creek landfill as this site is small and has a limited life. The EIS will need to identify the amount and make up of waste that cannot be recycled and will need to go to landfill. Council may accept a certain amount of waste at the Braidwood landfill provided the costs of Council accepting this waste are borne by the mine. A Trade Waste agreement is recommended.

4. Heritage Impact

Adequate heritage impact assessment of the site, due to existing mining relics being present and potential pre-European occupation, and identify measures to protect any significant sites, structures and artefacts should be identified in the EIS.

5. Infrastructure

Council requests that justification for the location of the infrastructure on site, especially the proximity of the stockpile and proposed treatment plant to rural dwellings be addressed.

6. Noise and Vibration

Council requests noise and vibration be addressed adequately with reference to Best Practice Guidelines for Noise, Vibration and Airblast Control, produced by Environment Australia and any other relevant publication.
The impacts of 24 hour operation need to be addressed so that there is no adverse impact on nearby residences.

7. **On-site Sewage Management**

Appropriate Local Government approvals for existing and proposed on-site effluent management systems need to be obtained. It is noted that the existing system on site does not appear to have approval. All applications should include supporting information to ensure any system is adequately sized and located.

8. **Water Resources, Quality and Monitoring**

Council is concerned about use of surface water and ground water that may potentially affect water resources in the area for the local community and environmental flows. It is Council's opinion that NOW approvals are required for use of dam and ground water associated with any use that is not for stock and domestic. The impact of water harvesting needs to be addressed in the EIS.

Adequate details with regard to monitoring of water quality and water quantity upstream and downstream of the proposed development need to be addressed in the EIS. Council is particularly concerned about the location of the tailings dam within the creek and the potential for this to fail.

9. **Flora and Fauna**

The preliminary assessment is considered to be inadequate in that it does not address all species likely to be found on the site. A full flora and fauna study should be undertaken using the DECCW guidelines.

There is a significant weed infestation on the subject land, particular on the block adjoining Majors Creek Road. Rehabilitation and mitigation measures should be included in the EIS.

10. **Community Impact**

Details regarding how community impacts will be monitored and complaints handled need to be incorporated in the EIS.

If you require further information please call Council's Development Services Coordinator, Mrs Kylie Coe, on 1300 735 025 or 02 6238 8111.

Yours faithfully

Louise Menday  
Director of Planning and Environmental Services