

3 March 2023

Mr Clay Preshaw  
Department of Planning and Environment  
4 Parramatta Square, 12 Darcy Street  
PARRAMATTA NSW 2124

Sent by email to:



Dear Clay,

**Re: Bowdens Silver Project (SSD 5765) – IPC Request for Information (Maloneys Road)**

Bowdens Silver has been asked to comment on a question provided by the Independent Planning Commission (IPC) to the Department of Planning and Environment (DPE) in correspondence dated 2 March 2023. Specifically, Bowdens Silver has been asked to comment on the following query.

*“whether ‘there is any reason why the relocation of the Maloneys Road should not be required to be completed prior to the commencement of any works on the site’”.*

The request for construction of the relocated Maloneys Road prior to commencement of any activities within the Mine Site was first provided by Mid-Western Regional Council. The question was specifically responded to in Section 5.5 of the *Amendment Submissions Report* (first amendment). The response noted that the proposed schedule for road construction and commencement of on-site activities remained appropriate as the expected traffic levels during the construction period were likely to be low relative to existing traffic passing through Lue (10% of existing traffic at a peak). In addition, it was noted that Bowdens Silver has committed to upgrade the intersection of Pyangle Road and Lue Road and that this upgrade would not be required should the relocation of Maloneys Road occur first and access via Pyangle Road not be required for the volume of vehicles accessing the Mine Site (use of Pyangle Road would be limited to exploration staff in light vehicles).

In terms of the traffic expected to be generated during the site establishment and construction stage, heavy vehicles travelling through the village of Lue at the peak of construction activity would include the following.

- Up to 4 movements per weekday and Saturday by shuttle buses (1 bus arrives and departs in the morning and 1 bus arrives and departs in the evening), likely to be a full size coach. The buses would operate based on shift times, generating up to 2 movements through the village of Lue most likely in the morning between 6:00am and 7:00am, and 2 movements between 5:00pm and 7:00pm.
- 32 movements per day of heavy vehicles (16 trucks inbound and 16 trucks outbound) before construction of the relocated Maloneys Road (first 6 months) and 10 movements per day (5 trucks inbound and 5 trucks outbound) after commissioning of the relocated Maloneys Road for miscellaneous deliveries, which typically occur during standard business hours 8:00am to 6:00pm.
- Occasional oversize or overmass vehicles, which would be managed on a case by case basis but would typically be limited to daylight hours.

Whilst it is appreciated that this is a change to existing conditions, it does not represent a substantial number of total vehicle trips and at a peak is 10% of the existing traffic.

The schedule for site establishment and construction is presented in Section 2.3.2 and Table 2.2 of the Project Description (Appendix 1 of the *Water Supply Amendment Report*). Table 2.2 is reproduced here as **Table A**. The schedule indicates those works required within the Mine Site that are planned to overlap with the construction of the relocated Maloneys Road. These activities would be limited to vegetation clearing, soil stripping, site earthworks, and preliminary construction work (footings for building). These activities are not significant noise generating actions and therefore the overlap of these activities with road construction would not have a substantial cumulative effect on noise generation. The construction activities that would require more intense traffic including multiple large load deliveries would all be undertaken once the relocated Maloneys Road was constructed.

It should also be noted that the timing of initial on-site earthworks and preparation is important so that once the relocated Maloneys Road has been constructed, Bowdens Silver may commence the major construction activities, such as the removal and transport of NAF construction material for use in the construction of the Tailings Storage Facility. The main construction activities can only commence after surface preparations (such as topsoil removal and stockpiling, erosion control) have been completed. Delaying these initial works until after construction of the relocated Maloneys Road would substantially delay the entire Project and all associated benefits. There would also be negative impacts to total Project costs and financial planning. It is roughly estimated that a two-month delay at that time would have a \$1.5 million to \$2.0 million cost associated with financial modelling of expected revenues (based on base-case scenario of the 2018 Feasibility Study). In addition, the same equipment and contractors would typically be used for the material supply for the Maloneys Road construction and the initial Mine Site earthworks and preparations. Making the work sequential instead of concurrent would increase the total fixed costs associated with contracted personnel and equipment.

Bowdens Silver accept that the IPC may determine that this work must be completed prior to the commencement of activities within the Mine Site and the Company would accept any such condition. However, it is considered unreasonable to delay on-site works as:

1. The difference in environmental impacts of the current schedule (traffic generation and associated impacts) relative to a delayed schedule would not be significant;
2. The on-site activities that would overlap with the construction of the relocated Maloneys Road would be minor and not involve the most intensive construction work;
3. It is more efficient to schedule the activities as proposed so that the site establishment and construction period is limited in duration and operations may commence, including the relevant operating environmental management measures and criteria; and
4. Council may forego the benefit of Bowdens Silver's commitment to upgrade the intersection of Lue Road and Pyangle Road as heavy vehicle use of the intersection would be drastically curtailed.

We trust the above addresses the query to your satisfaction, however if you have any further queries on this matter please contact myself or Anthony McClure of Bowdens Silver.

Yours sincerely

  
Nicholas Warren  
Principal Environmental Consultant

Enclosed: Table A – Bowdens Silver Indicative Site Establishment and Construction Schedule

**Table A  
Bowdens Silver Indicative Site Establishment and Construction Schedule**

Construction Activity	Month																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
<b>Approvals, Engineering and Procurement</b>																		
Secondary approvals																		
Engineering/detailed design																		
Procurement																		
<b>Off-site Road Network</b>																		
Survey and mark out key boundaries																		
Install erosion and sediment controls, vegetation clearing and soil stripping																		
Construct relocated Maloneys Road																		
Construct relocated Maloneys Road/Lue Road Intersection																		
Construct new crossing across Lawsons Creek																		
Construct relocated Maloneys Road Rail Bridge																		
<b>Site Earthworks and Infrastructure</b>																		
Survey and mark out key boundaries																		
Install erosion and sediment controls																		
Vegetation clearing, soil stripping and stockpiling																		
Construct internal roads, culverts, drains and underground services																		
Construct water storage infrastructure.																		
Establish low grade ore stockpile area 1 and WRE Cells 1 and 2																		
Construct/install administration offices/amenities, etc.																		
<b>Processing Plant and Mining Facility</b>																		
Earthworks/footings																		
Plant construction/assembly/installation																		
Piping/Electricals																		
Instrumentation																		
Paste thickener construction/assembly/installation																		
Commissioning																		
<b>Open Cut Pit Development</b>																		
Vegetation clearing																		
Soil Stripping																		
Ore and waste rock extraction																		
<b>Tailings Storage Facility and Pipelines</b>																		
Vegetation clearing, soil stripping and ripping																		
Construct interception dams																		
Tailings impoundment area preparation																		
Delivery of NAF Waste Rock and Crushing																		
Construct Initial Embankment																		
Lining of TSF																		
Install pond return and monitoring infrastructure																		
Install Tailings, Paste Thickener Plant and Pond Return Pipelines																		
<b>Power Transmission Lines</b>																		
Construct 66kV Power Transmission Line																		
Source: Bowdens Silver Pty Limited																		