



DOC18/26046-1  
DA 9297 MOD 4

Mr Tertius Greyling  
Senior Environmental Assessment Officer  
Department of Planning & Environment  
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Dear Tertius

**Mount Pleasant Coal Mine – Modification 4 (MOD 4)**

I refer to your e-mail dated 15 January 2018 inviting the Office of Environment and Heritage (OEH) to review the Environmental Impact Statement for the proposed modification to the Mount Pleasant Coal Mine (DA 9297 MOD 4).

The proposed modification involves establishing a new rail loop, conveyor belt, water pipeline from the Hunter River, and an electricity transmission line on about 46.88 hectares of land. It also includes relinquishing 15.1 hectares containing native vegetation from the approved South West Out of Pit emplacement area.

OEH's recommendations are provided in **Attachment A** and detailed comments are provided in **Attachment B**. If you require any further information regarding this matter, please contact Steven Cox, Senior Team Leader Planning, on 4927 3140.

Yours sincerely

9th February 2018

**SHARON MOLLOY**  
**Director Hunter Central Coast Branch**  
**Regional Operations Division**

Contact officer: STEVEN COX  
02 4927 3140

Enclosure: Attachments A and B

## OEH's recommendations

### Mount Pleasant Coal Mine (MOD 4)

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1. The proponent should clearly identify the residual impacts of the project and the proposed offset strategy for those impacts, including how any land based offsets will be secured and managed.
2. OEH recommends that an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the National Parks and Wildlife Act 1974 is sought from OEH, if impacts to any of the three Aboriginal sites identified within the modification area cannot be avoided.
3. OEH recommends that the approved Mount Pleasant Operation Aboriginal Cultural Heritage Management Plan (MACH Energy 2017) be updated to reflect the modification area and to include the additional Aboriginal sites.
4. The proponent should provide the following additional information on the flood study for OEH to complete its assessment:
  - section 4.3 of the flood study should include a box plot or a graph indicating the variability of the peak flows for the critical storm duration
  - the potential impact of blockages of the existing culverts and the proposed bridge openings, in accordance with ARR 2016 requirements, should be included
  - impacts for floods greater than the 1% AEP design flood event should be included, up to and including the Probable Maximum Flood (PMF), including the 0.5% AEP and 0.2% AEP design storm events.

## OEH's detailed comments

### Mount Pleasant Coal Mine (MOD 4)

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#### Biodiversity

##### 1. An offset strategy should be provided

The Environmental Impact Statement (EIS) provided does not include an offset package for the residual impacts of the project or state how any offsets would be secured and managed. While the modification proposal includes the relinquishment of 15.1 hectares containing native vegetation, there is no assessment of the suitability of the relinquished area as an offset for the impacts of the project.

The EIS should clearly identify the residual impacts of the project and the proposed offset strategy for those impacts. It is unclear from the EIS what the precise level of impact is (e.g. what is the area of each plant community type to be impacted) and if the relinquished area is a suitable offset for the impacts of the project.

##### Recommendation 1

The proponent should clearly identify the residual impacts of the project and the proposed offset strategy for those impacts, including how any land based offsets will be secured and managed.

#### Aboriginal cultural heritage

##### 2. An Aboriginal Heritage Impact Permit (AHIP) may be required

The assessment for the proposed modification included both archaeological field survey and test excavations over the areas of land that have not been previously examined for Aboriginal cultural heritage objects and values. All aspects of this assessment process were undertaken in consultation with the Aboriginal community.

The archaeological field survey identified one Aboriginal site in the modification area (and two sites outside the modification area) and the test excavation program identified two further Aboriginal sites in the modification area. The Aboriginal cultural heritage assessment concluded the lands within the modification area are of low archaeological potential and low scientific significance, reflective of the high levels of land use disturbance.

##### Recommendation 2

OEH recommends that an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the National Parks and Wildlife Act 1974 is sought from OEH, if impacts to any of the three Aboriginal sites identified within the modification area cannot be avoided.

##### 3. The Aboriginal Cultural Heritage Management Plan should be updated

The Mount Pleasant Operation Aboriginal Cultural Heritage Management Plan (MACH Energy 2017) should be updated to include the MOD 4 area and include the five Aboriginal sites identified during studies (two outside and three inside the modification area) for the MOD 4 project.

##### Recommendation 3

OEH recommends that the approved Mount Pleasant Operation Aboriginal Cultural Heritage Management Plan (MACH Energy 2017) be updated to reflect the modification area and to include the additional Aboriginal sites.

## Flooding issues

### 4. Additional flooding information is required

Section 6 of the flood study includes predicted flood level impacts because of the modification, which includes proposed mitigation measures. These impacts are currently indicated as up to 0.01 metre on privately owned dwellings or commercial properties, however greater impacts are indicated on mine owned dwellings or commercial properties. These impacts are indicated as covering a significant amount of land, in extent up to Denman Road to the south and south-east. Impacts up to 0.10 could be considered minor and within the accuracy of the modelling and assumptions with the hydrologic and hydraulic modelling.

Further information is required for OEH to complete its assessment of the predicted flooding impacts of the project.

#### Recommendation 4

The proponent should provide the following additional information on the flood study for OEH to complete its assessment:

- section 4.3 of the flood study should include a box plot or a graph indicating the variability of the peak flows for the critical storm duration
- the potential impact of blockages of the existing culverts and the proposed bridge openings, in accordance with ARR 2016 requirements, should be included
- impacts for floods greater than the 1% AEP design flood event should be included, up to and including the Probable Maximum Flood (PMF), including the 0.5% AEP and 0.2% AEP design storm events.