



Office of
Environment
& Heritage

DOC17/608071-1
MP 08_0101 MOD 8

Ms Megan Dawson
A/Team Leader
Resource Assessments, Planning Services
Department of Planning and Environment
megan.dawson@planning.nsw.gov.au

Dear Ms Dawson

Integra Underground Coal Mine – Modification 8 (MP 08_0101 MOD 8), Camberwell – Singleton Council

I refer to your e-mail dated 6 December 2017, seeking comments on the proposed Modification 8 to the Integra Underground Coal Mine (MP 08_0101 MOD 8), near Camberwell. OEH has reviewed the proposed development in relation to Aboriginal cultural heritage, flood risk, and impacts on biodiversity.

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 Robert Gibson, Regional Biodiversity Conservation Officer, on 4927 3154.

Yours sincerely

SHARON MOLLOY
Director Hunter Central Coast Branch
Regional Operations Division

Contact officer: ROBERT GIBSON
02 4927 3154

Enclosure: Attachment A and B

Attachment A**OEH's Recommendations****Integra Underground Coal Mine (MP 08_0101 MOD 8)**

1. OEH recommends that the Aboriginal cultural heritage constraints and obligations identified for the current modification should be integrated into the Integra Underground Aboriginal Cultural Heritage Management Plan (HVCC 2017).
2. OEH is satisfied with the surface water assessment provided and no additional consent conditions for surface water and flood risk are required.
3. The consent conditions for the project should include a requirement for every native tree 2 metres or greater in height removed to be replaced with ten planted trees of the same species. All planted trees should be managed until they reach maturity.
4. OEH recommends that the consent conditions for the project include a contingency that requires offsetting for any unpredicted subsidence impacts in accordance with NSW offsetting policy in force at that time.

OEH's detailed comments

Integra Underground Coal Mine (MP 08_0101 MOD 8)

1. Aboriginal Cultural Heritage

1.1. The approved Aboriginal Cultural Heritage Management Plan should be updated

Five previously recorded and currently extant Aboriginal sites are situated within the Assessment Boundary for the proposed Modification. The project area once contained a number of previously recorded sites which have since been destroyed (through past authority) and are no-longer considered valid on the Aboriginal Heritage Information Management system (AHIMS). No additional Aboriginal sites were identified during the survey work undertaken for this project, and no previously recorded Aboriginal sites are expected to be directly impacted by the proposed Modification.

HV Coking Coal Pty Limited intend to avoid one of the identified sites whilst the remaining four sites will be managed in accordance with the protocols established in the approved Aboriginal Cultural Heritage Management Plan for the Integra Underground project (HVCC ACHMP 2017). These protocols include a site condition monitoring program and an unexpected finds protocol.

1.1.1. Recommendation

OEH recommends that the Aboriginal cultural heritage constraints and obligations identified for the current modification should be integrated into the Integra Underground Aboriginal Cultural Heritage Management Plan (HVCC 2017).

2. Flooding and Flood Risk

2.1. OEH is satisfied with the surface water assessment

OEH has reviewed the Surface Water Assessment (SWA) prepared by Hansen Bailey (dated November 2017) and is satisfied with the assessment of potential flooding impacts to Bettys Creek, surface infrastructure, the new access road off Middle Falbrook Road and to offsite areas. OEH is also satisfied with that the predicted subsidence impacts of increased ponding in the watercourses associated with this modification is minor and is contained within the site boundaries.

2.1.1. Recommendation

OEH is satisfied with the surface water assessment provided and no additional consent conditions for surface water and flood risk are required.

3. Biodiversity

3.1. Impacts to native trees should require replacement trees at a ten to one ratio

While no Secretary's Environmental Assessment Requirements were issued for this proposed modification (MOD) it will still have a residual impact on native vegetation and threatened species habitat. In line with the consent conditions for the Integra Underground Mine MOD 7, OEH recommends replacing any native tree species cleared by the project at a ten to one ratio. This should apply only to areas not covered by the Mount Owen Continuation Project (SSD 5850) consent.

3.1.1. Recommendation

The consent conditions for the project should include a requirement for every native tree 2 metres or greater in height removed to be replaced with ten planted trees of the same species. All planted trees should be managed until they reach maturity.

3.2. Unpredicted subsidence impacts should be offset

Vertical mine subsidence of up to 2.2 metres is predicted, however given the terrain and vegetation the proponent considered that subsidence was unlikely to have a significant impact on threatened species or native vegetation. OEH recommends that the consent conditions for the project include a contingency that requires offsetting for any unpredicted subsidence impacts.

3.2.1. Recommendation

OEH recommends that the consent conditions for the project include a contingency that requires offsetting for any unpredicted subsidence impacts in accordance with NSW offsetting policy in force at that time.