



Our ref: DOC21/459286

Your ref: SSD-10269

Philip Neville
Senior Environmental Assessment Officer
Planning and Assessment Group
Philip.Neville@planning.nsw.gov.au

Dear Phil

Response to Submissions – Narrabri Underground Stage 3 Extension Project

Thank you for your email dated 2 June 2021 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning, Industry and Environment seeking advice on the response to submissions (RTS) Report for Narrabri Underground Stage 3.

BCS has reviewed the RTS report against our comments on the exhibited Environmental Impact Statement (EIS) sent to Planning and Assessment Group (PAG) on 16 December 2020. The RTS report states that the Biodiversity Development Assessment Report (BDAR) has been revised since public exhibition of the project and will be submitted for review in September 2021. BCS will therefore review the adequacy and accuracy of the updated BDAR when it is submitted.

BCS requires the following information to complete a review of the updated BDAR when it is submitted:

- a newly certified BDAR, including credit reports;
- all revised spatial data (shapefiles) used in the BDAR; and
- access to the associated case in the Biodiversity Offsets and Agreement Management System (BOAMS).

An increase in surface impacts following approval will require a project modification

In the response to the exhibited BDAR, BCS recommended that the assessment:

- *Provide a comprehensive definition of all the surface infrastructure components, which will result in surface disturbance, required for the project;*
- *Confirm that all components have been included within the overall development footprint for the proposal and have been addressed in Stage 2 of the BDAR*

However, it is noted that the RTS report still references an indicative surface development footprint.

It should be noted that the biodiversity credit calculations for the project are quantified according to the spatial extent of the proposed development footprint. In addition, if approved, the final credit obligation calculated for impacted species and ecosystem credits will be stated in the development conditions for the project.

As the credit obligation will be identified in the approval conditions, it is BCS's expectation that any later changes to the project footprint which result in the impact to biodiversity values exceeding that or additional to that within the development conditions, would require a modification to the



approved project. As such, it is recommended that the upper quantum of likely impact required for the project is calculated when preparing the revised BDAR.

If you require any further information regarding this matter, please contact Ben Ellis, Senior Conservation Planning Officer, via ben.ellis@environment.nsw.gov.au or (02) 8275 1838.

Yours sincerely

A handwritten signature in purple ink that reads 'Renee Shepherd'.

Renee Shepherd
Acting Senior Team Leader, Planning North West
Biodiversity, Conservation and Science Directorate

16 June 2021