

25 March 2025

THE DIRECTOR
Industry Assessments, Planning and Assessment
Department of Planning, Industry and Environment

Dear Sir/Madam,

Subject Northern Coal Services Project (mod 4 - Cooranbong Coal Stockpile Extension)

Thank you for the opportunity to comment on the above application.

Council staff have reviewed the application and provide the following comments:

Aboriginal heritage

No objections. The report was undertaken in accordance with Heritage NSW guidelines and includes management conditions recommended which could be included in conditions of consent.

European heritage

No objections. The report was undertaken in accordance with the Heritage Council's code of practice and includes management conditions recommended which could be included in conditions of consent.

Economic impact

Supported. The report appears to have been prepared in accordance with the *Guideline for the economic assessment of mining and coal* (NSW, 2015), and the assumptions used to inform the assessment appear reasonable. The key findings reported a net benefit to the local area.

Creeks and watercourses

No objections. The proposed Coal Stockpile Extension site is located within the catchment of an unnamed watercourse that discharges into Muddy Lake before entering Lake Macquarie.

This watercourse is classified as a third order watercourse. In accordance with LMCC DCP (2014) Part 7 Section 2.10, a 30 metre vegetated riparian zone (VRZ) on both sides of the watercourse has been proposed to be retained. No native vegetation within the VRZ is proposed to be removed.

The findings of the Surface Water Impact Assessment are supported. The mitigation and management measures identified in the report should be incorporated into conditions of consent for any approval of the proposed development.

Water management plan

No objections. The Surface Water Impact Assessment by Alluvium, dated 10/09/2024, has been reviewed. No objections are raised to its findings. The current Water Management Plan for the site will need to be amended to reflect the modified stockpile.

Ecology

Recommend further consideration. Although the proposed area of impact is relatively small, the intensity of the impact is high with high numbers of threatened species and threatened species habitats (including Hollow Bearing Trees) potentially being permanently lost, as evidenced by the large credit requirements and assessment Matter of National Environmental Significance. Loss of hollow bearing tree is now recognised as a key threatening process. These impacts should be considered unacceptable considering rates of habitat loss and extinction in NSW.

Given the significant impacts to threatened species, it is strongly recommended that alternative areas on the site be reconsidered for the stockpile expansion. Reports should include a clearer analysis of the avoid and minimise alternatives. Refinement of original designs mentioned in the BDAR should be documented and clearly mapped and discussed. It is not clear how the impact of the proposed expansion would compare on other parts of the site, for example. Therefore, more detail comparing the impact of different locations should be presented and analysed. Possible process alternatives should be reconsidered that would negate the need for expanding the stockpile.

More detailed practical mitigation measures need to be provided. For example, if alternatives are clearly demonstrated to be unfeasible, a threatened species and habitat rescue and relocation plan should be prepared and implemented prior to clearing. The plan should include but not be limited to, details regarding habitat, such as tree hollows, that can be salvaged for reuse, species that would need to be captured for relocation and strategies for translocation of *Grevillea parviflora* subsp. *parviflora* and *Tetratheca juncea* and any other significant plants including orchids.

Council welcomes further engagement on this matter/these matters.

Should you require further information, please contact the undersigned on 4921 0025 or by e-mail on gkeech@lakemac.nsw.gov.au.

Yours faithfully



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