

30 June 2026

Ms Melissa Dunlop
Team Leader Assessments
Energy and Resource Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square
Parramatta NSW 2150

**Northern Coal Services Project – Modification 4 (SSD-5145-Mod-4)
Response to DCCEEW Conservation Programs, Heritage and Regulation Advice dated
12 June 2026**

Dear Ms Dunlop,

Centennial Northern Coal Services Pty Limited (**Centennial**) submits the attached revised Biodiversity Development Assessment Report (**BDAR**), updated BAM-C assessment, BOAMS data package and supporting information in response to the Department's Request for Additional Information dated 22 June 2026.

The information requested by the Department and the NSW Department of Climate Change, Energy, the Environment and Water (**DCCEEW**) Conservation Programs, Heritage and Regulation Group (**CPHR**) has now been comprehensively addressed.

Importantly, CPHR's advice dated 12 June 2026 identified only four remaining biodiversity matters requiring clarification and expressly acknowledged that all other biodiversity matters previously raised had been resolved. The attached documentation addresses each of the remaining issues in full and provides the additional information requested by CPHR.

Biodiversity Issue 2 – Avoidance and Minimisation

CPHR requested additional evidence demonstrating application of the avoid, minimise and offset hierarchy, including evidence of design evolution, consideration of alternatives and the extent of biodiversity impacts avoided through project refinement.

In response, Centennial has provided an attachment documenting the evolution of the proposal footprint from project inception through to the current design. The attachment includes spatial plans for each design iteration and quantifies the progressive reduction in disturbance area achieved during project development.

The attachment demonstrates that the disturbance footprint has been reduced from approximately 9.45 hectares (12.2 hectares including the current stockpile area) in September 2022 to 2.93 hectares in the current proposal, representing an overall reduction of approximately 69 per cent. The reduction reflects multiple design revisions specifically

undertaken to avoid and minimise impacts to native vegetation, threatened flora habitat, threatened fauna habitat and hollow-bearing trees.

The attached design history provides clear evidence that avoidance and minimisation principles have been applied throughout project development and that the current proposal represents the minimum practical disturbance footprint capable of achieving the operational objectives of the project.

The revised BDAR has also been updated to incorporate additional discussion regarding the application of the avoid, minimise and offset hierarchy and references the attached design evolution plans.

This issue has been fully addressed.

Biodiversity Issue 5 – BDAR Certification and BAM-C Data

CPHR requested a valid certified BDAR, updated BAM-C assessment and provision of the associated BOAMS and digital data package.

The revised BDAR has been re-certified by an Accredited BAM Assessor in accordance with the requirements of the *Biodiversity Conservation Act 2016* and Biodiversity Assessment Method.

The BAM-C assessment has been reopened, updated and finalised, with the updated biodiversity credit calculations incorporated into the revised BDAR. The BOAMS case and associated digital data package have also been provided to facilitate review by DCCEE.

The procedural issue identified by CPHR has therefore been rectified and the biodiversity assessment is now fully compliant with the certification requirements of the *Biodiversity Conservation Act 2016* and BAM.

This issue has been fully addressed.

Biodiversity Issue 10 – *Rhizanthella slateri* Surveys

CPHR requested clarification regarding the survey methodology adopted for *Rhizanthella slateri* and confirmation that the surveys accord with BAM requirements.

The revised BDAR includes additional information regarding the survey methodology, survey timing, survey effort and survey outcomes. Previous inconsistencies identified between supporting appendices and the BDAR have been corrected and the revised assessment now clearly documents the basis upon which the species was assessed.

The revised BDAR demonstrates that appropriate targeted survey effort was undertaken and provides the clarification requested by CPHR.

This issue has been fully addressed.

Biodiversity Issue 15 – Hollow Replacement Strategy

CPHR requested clarification regarding Centennial's commitment to the preparation and implementation of a hollow replacement strategy.

The revised BDAR has been amended to remove any ambiguity. The relevant mitigation measure now explicitly states that Centennial will prepare and implement a hollow replacement strategy.

The commitment is clear, enforceable and unambiguous.

This issue has been fully addressed.

Conclusion

The revised BDAR, updated BAM-C assessment, BOAMS data package and supporting attachments comprehensively address all recommendations identified by CPHR in its advice dated 12 June 2026.

The information requested by CPHR has now been provided in full.

Centennial considers that all outstanding biodiversity issues have been comprehensively addressed and that the application is supported by a valid certified BDAR, updated BAM-C assessment, complete BOAMS data package and detailed evidence demonstrating application of the avoid, minimise and offset hierarchy.

Accordingly, Centennial respectfully submits that there are no remaining biodiversity assessment matters requiring further consideration and no outstanding technical issues preventing determination of the application.

Given the limited scope of the remaining matters raised by CPHR and the comprehensive response now provided, Centennial respectfully requests that the Department proceed to finalise its assessment and determine SSD-5145 Modification 4 as soon as practicable.

Should the Department require any clarification regarding the attached material, Centennial would be pleased to provide further assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ron Bush', with a stylized, flowing script.

Ron Bush
General Manager – Development & Approvals

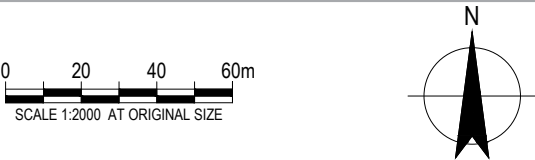
CPHR Issue	Recommendation	Centennial Response	Relevant Documentation
Issue 2 – Inadequate avoidance and minimisation of biodiversity impacts	Demonstrate application of the avoid, minimise and offset hierarchy and provide evidence of design evolution and alternatives considered.	The revised BDAR has been updated to provide additional discussion regarding application of the avoid, minimise and offset hierarchy. A dedicated attachment has also been prepared documenting the evolution of the proposal footprint through successive design iterations. The attachment demonstrates a reduction in disturbance area from approximately 9.45 ha to 2.93 ha, representing an overall reduction of approximately 69%, and confirms that the current proposal represents the minimum practical disturbance footprint capable of achieving the project's operational objectives.	Revised BDAR Section 5 – Avoid and Minimise Impacts. Figure 10 – Subject Land Boundary Changes. Vegetation Disturbance Boundary and History Plans Attachment.
Issue 5 – BDAR not valid in accordance with BAM and BC Act	Submit a valid certified BDAR, updated BAM-C assessment and associated digital data package for review.	The BAM-C assessment has been reopened, updated and finalised. The revised BDAR has been certified by an Accredited BAM Assessor and incorporates the updated biodiversity credit calculations. The BOAMS case and associated digital data package have also been provided to DCCEEW.	Revised BDAR Certification Pages. Appendix E – Biodiversity Credit Report. BAM-C Outputs. BOAMS Data Package and Attachment.
Issue 10 – <i>Rhizanthella slateri</i> surveys	Demonstrate that surveys accord with BAM requirements and provide clarification regarding survey methodology and adequacy.	Additional information has been incorporated into the revised BDAR regarding survey methodology, survey timing, survey effort and assessment outcomes. Previous inconsistencies between supporting documentation and the BDAR have been corrected. The revised assessment provides the clarification requested by CPHR and demonstrates compliance with BAM survey requirements.	Revised BDAR Section 4 – Threatened Species. Table 6 – Candidate Threatened Species Surveys. Supporting Survey Appendices.
Issue 15 – Hollow replacement strategy	Clearly commit to preparing and implementing a hollow replacement strategy.	The mitigation measure has been amended to state that Centennial will prepare and implement a hollow replacement strategy.	Revised BDAR Section 5.2 – Recommendations for Mitigation. Table 9 – Impact Mitigation Measures.



- LEGEND:**
- VEGETATION DISTURBANCE BOUNDARY
 - DP CADASTRE BOUNDARY
 - EXISTING ROAD/TRACK
- NOTES:**
- VEGETATION DISTURBANCE BOUNDARY DATED SEPTEMBER 2022
 - BOUNDARY AREA: 9.45ha

PLAN
SCALE 1:2000

P01	FOR INFORMATION	PB	29.06.26
rev	description	app'd	date



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project no.
12653109

CENTENNIAL MANDALONG Pty Ltd
COORANBONG STOCKPILE EXTENSION
VEGETATION DISTURBANCE BOUNDARY
HISTORY - SEPTEMBER 2022
SHEET 1 OF 5

12653109-GHD-00-00-SKT-CI-00001
sketch no.
P01

size
A3



LEGEND:

- VEGETATION DISTURBANCE BOUNDARY
- CADASTRE BOUNDARY
- EXISTING ROAD/TRACK

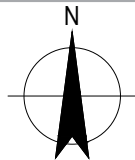
NOTES:

- VEGETATION DISTURBANCE BOUNDARY DATED AUGUST 2023
- BOUNDARY AREA: 4.10ha

PLAN
SCALE 1:2000

P01	FOR INFORMATION	PB	29.06.26
rev	description	app'd	date

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SCALE 1:2000 AT ORIGINAL SIZE



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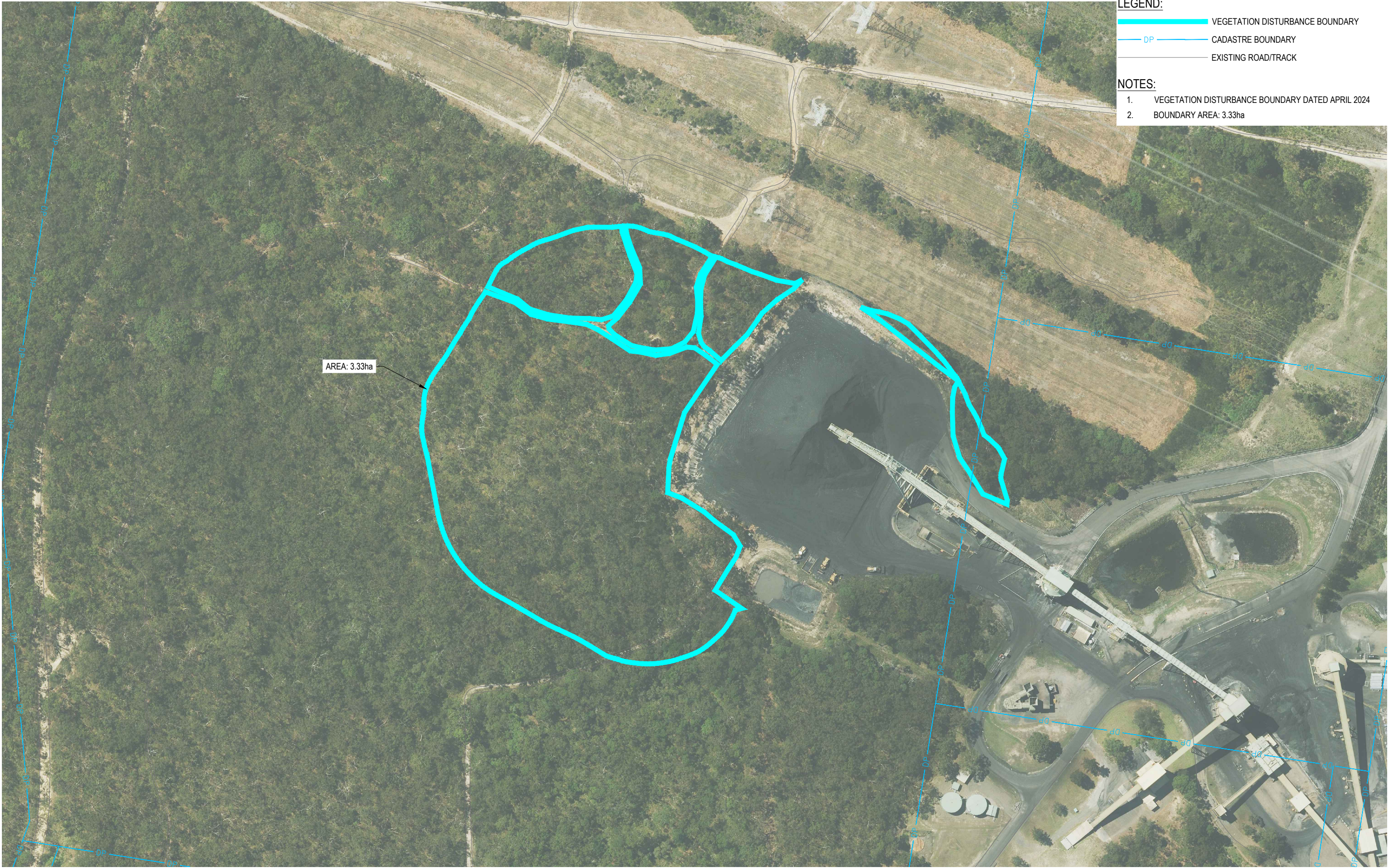
CENTENNIAL MANDALONG Pty Ltd
COORANBONG STOCKPILE EXTENSION
VEGETATION DISTURBANCE BOUNDARY
HISTORY - PRE-FEASIBILITY OPTION
AUGUST 2023 - SHEET 2 OF 5

12653109-GHD-00-00-SKT-CI-00002

sketch no.

rev no.
P01

size
A3



LEGEND:

- VEGETATION DISTURBANCE BOUNDARY
- DP CADASTRE BOUNDARY
- EXISTING ROAD/TRACK

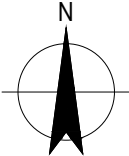
NOTES:

- VEGETATION DISTURBANCE BOUNDARY DATED APRIL 2024
- BOUNDARY AREA: 3.33ha

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COORANBONG STOCKPILE EXTENSION
VEGETATION DISTURBANCE BOUNDARY
HISTORY - 30% PRELIMINARY DESIGN
VERSION 1 - APRIL 2024 - SHEET 1 OF 5

project no.
12653109

12653109-GHD-00-00-SKT-CI-00003

sketch no.

rev no.
P01

size
A3



LEGEND:

- VEGETATION DISTURBANCE BOUNDARY
- DP CADASTRE BOUNDARY
- EXISTING ROAD/TRACK

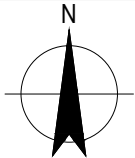
NOTES:

- VEGETATION DISTURBANCE BOUNDARY DATED FEBRUARY 2025
- BOUNDARY AREA: 2.98ha

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P01	FOR INFORMATION	PB	29.06.26
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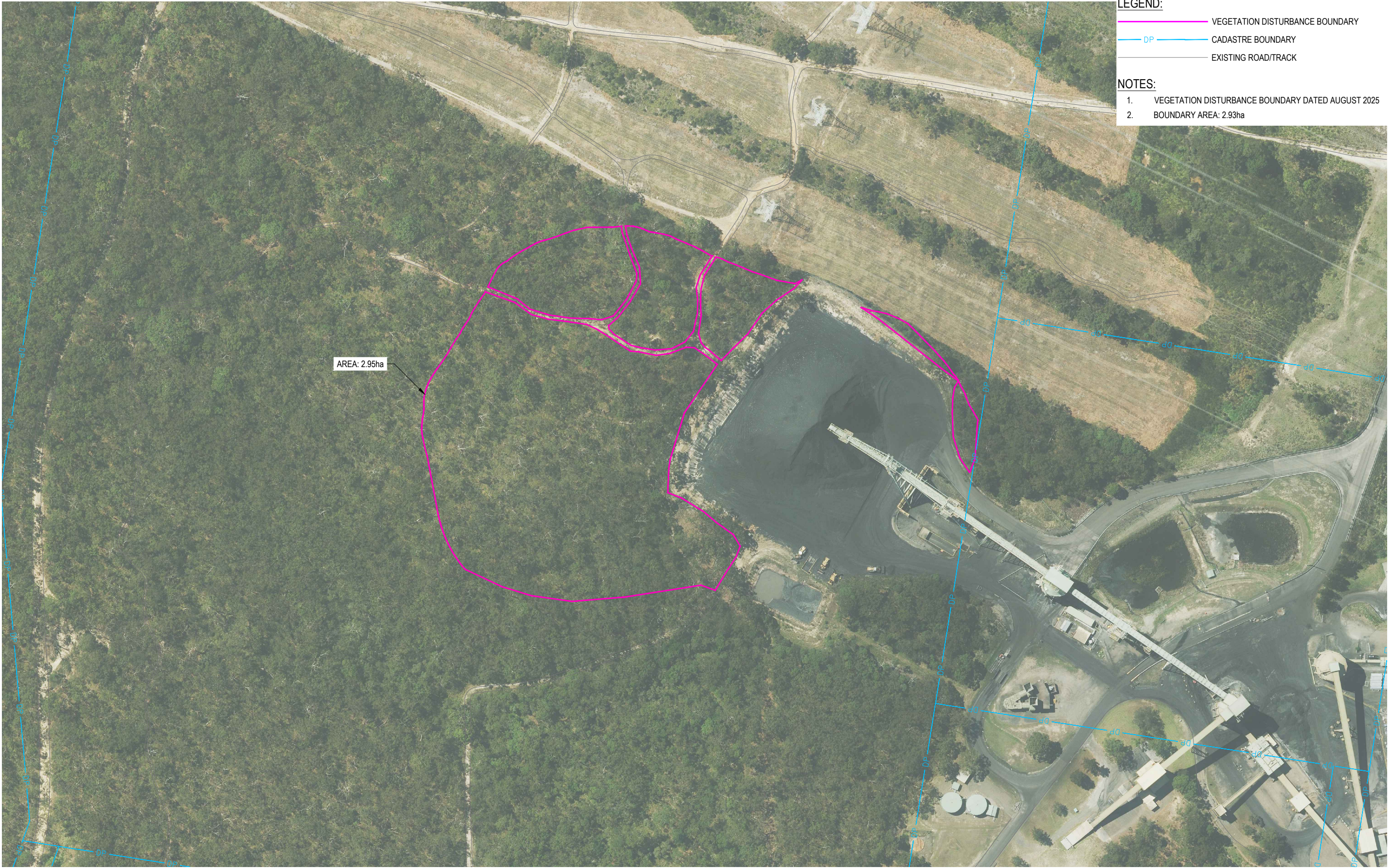
CENTENNIAL MANDALONG Pty Ltd
COORANBONG STOCKPILE EXTENSION
VEGETATION DISTURBANCE BOUNDARY
HISTORY - MODIFICATION SUBMISSION
FEBRUARY 2025 - SHEET 4 OF 5

12653109-GHD-00-00-SKT-CI-00004

sketch no.

rev no.
P01

size
A3

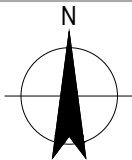


- LEGEND:**
- VEGETATION DISTURBANCE BOUNDARY
 - DP CADASTRE BOUNDARY
 - EXISTING ROAD/TRACK
- NOTES:**
- VEGETATION DISTURBANCE BOUNDARY DATED AUGUST 2025
 - BOUNDARY AREA: 2.93ha

PLAN
SCALE 1:2000

P01	FOR INFORMATION	PB	29.06.26
rev	description	app'd	date

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SCALE 1:2000 AT ORIGINAL SIZE



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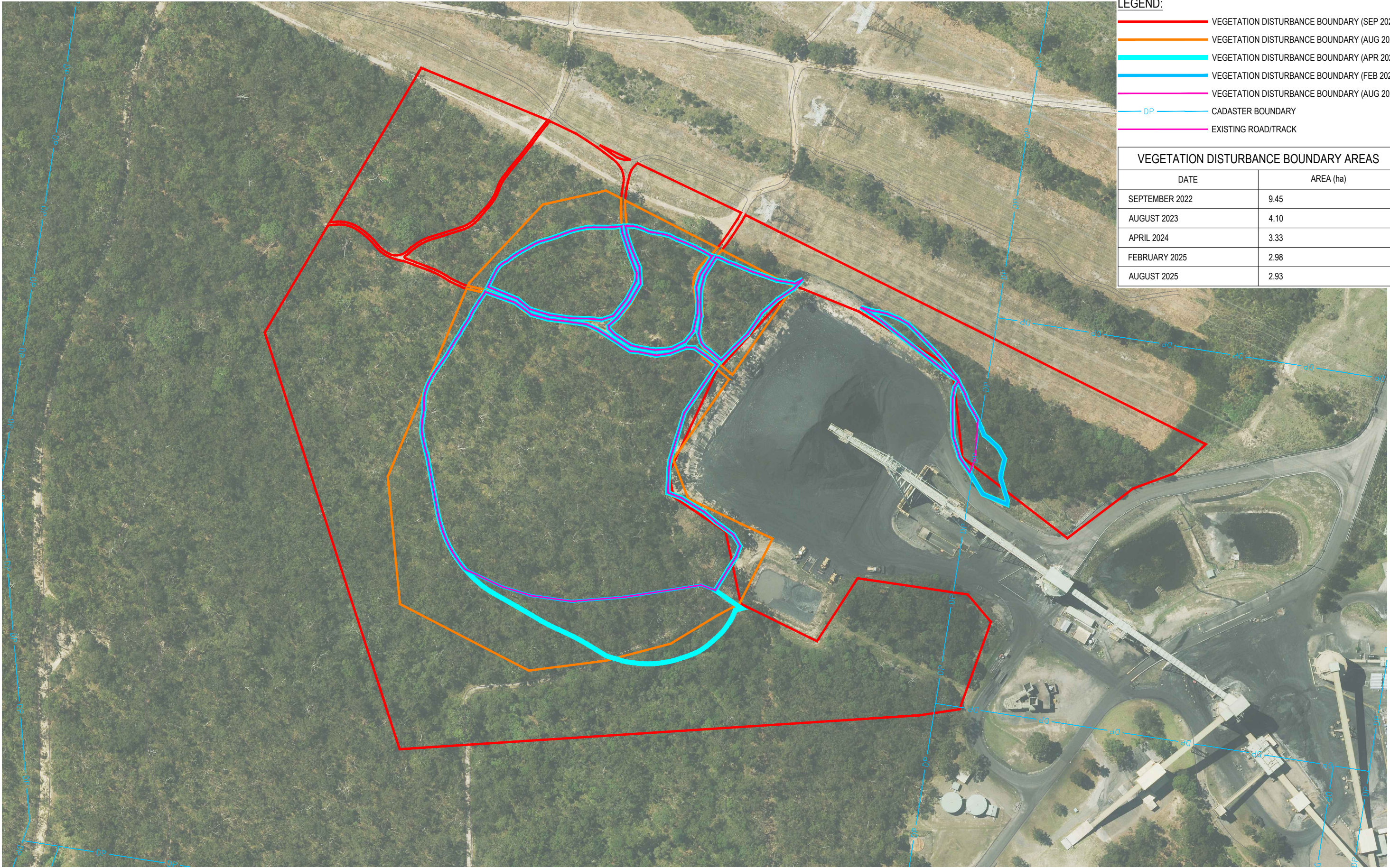


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COORANBONG STOCKPILE EXTENSION
VEGETATION DISTURBANCE BOUNDARY
HISTORY - RESPONSE TO SUBMISSION
AUGUST 2025 - SHEET 5 OF 5

12653109-GHD-00-00-SKT-CI-00005 sketch no. rev no. P01

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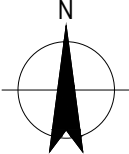


- LEGEND:
- VEGETATION DISTURBANCE BOUNDARY (SEP 2022)
 - VEGETATION DISTURBANCE BOUNDARY (AUG 2023)
 - VEGETATION DISTURBANCE BOUNDARY (APR 2024)
 - VEGETATION DISTURBANCE BOUNDARY (FEB 2025)
 - VEGETATION DISTURBANCE BOUNDARY (AUG 2025)
 - DP CADASTER BOUNDARY
 - EXISTING ROAD/TRACK

VEGETATION DISTURBANCE BOUNDARY AREAS	
DATE	AREA (ha)
SEPTEMBER 2022	9.45
AUGUST 2023	4.10
APRIL 2024	3.33
FEBRUARY 2025	2.98
AUGUST 2025	2.93

PLAN
SCALE 1:2000

P01	FOR INFORMATION	PB	29.06.26
rev	description	app'd	date



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COORANBONG STOCKPILE EXTENSION
VEGETATION DISTURBANCE BOUNDARY
HISTORY - ALL OVERLAYED
SHEET 1 OF 1

Case Submitted - DM-00062096 | ER092_Cooranbong_SSD_S_BDAR

From DCCEEW BOS No-Reply Mailbox <bos.noreply@dcceew.nsw.gov.au>

Date Fri 2026-06-26 6:01 PM

To Arne Bishop <arne@ecoresolve.com.au>

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Dear Arne,

Please be advised that Development Application case [DM-00062096 - ER092_Cooranbong_SSD_S_BDAR](#) has been submitted to Hunter Regional Planning Team - NSW DCCEEW via the BOS Portal. Their representative may contact you should they have any questions or concerns.

The case is now locked for editing. You may still view all case details, related assessments, attachments, and credit summary information at any time.

If the Consent Authority requires further clarification, the case may be returned to you for updates. You will be notified by email if this occurs.

Kind regards,

BOS Support Team

Department of Climate Change, Energy, the Environment and Water

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