



Office of Environment & Heritage

Your reference: SSD 5144 Mod 1
Our reference: DOC16/202637-2
Contact: Robert Gibson, 4927 3154

Ms Jessie Evans
Team Leader
Planning Services – Resource Assessment & Compliance
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Evans

RE: MANDALONG TRANSMISSION LINE TL24 RELOCATION PROJECT (SSD-5144 MOD 1)

I refer to your email dated 26 April 2016, seeking comments on the exhibited Mandalong Transmission Line TL24 Relocation Project Statement of Environmental Effects (SEE) in the Wyong local government area. The Office of Environment and Heritage (OEH) understands that it is a Section 96(2) modification to the existing State Significant Development approval SSD-5144 and that the SEE was on public exhibition from 22 April to 6 May 2016. OEH has reviewed the proposed modification in relation to impacts on Aboriginal cultural heritage and threatened biodiversity.

Aboriginal Cultural Heritage

OEH has reviewed the Mandalong Transmission Line (TL24) Relocation Project *Aboriginal Heritage Impact Assessment* (RPS, 2015) for Centennial Mandalong (SSD-5144 MOD 1). Based on this review OEH is satisfied that the management measures proposed for the archaeological sites identified within the project application area are adequate and appropriate given the nature of the archaeological record and the range of activities to be undertaken within the operational footprint of the project application area. OEH has no additional concerns with respect to the Aboriginal cultural heritage management of the TL24 project.

Biodiversity

OEH has reviewed the *Flora and Fauna Assessment* (RPS, 2016a) for the proposed new route for the relocated section of electricity line easement provided in Appendix 6 of the SEE. The proposed relocation of the transmission line would clear about 8.5 hectares (ha) of native vegetation which comprises about 0.3 ha of Coastal Narrabeen Moist Forest (=Plant Community Type (PCT) HU507), and about 8.2 ha of Coastal Foothills Spotted Gum – Ironbark Forest (=HU803); none of which meets the definition on any currently-listed threatened community under the *Threatened Species Conservation Act 1995*. The vegetation in the development footprint is likely used by foraging by a range of local threatened birds and bats.

To mitigate the impact of clearing for the proposed development the proponent is offering a biodiversity offset of 72.3 ha which contains about 69.2 ha of native woody vegetation: 57.3 ha of Spotted Gum – Broad-leaved Mahogany - Grey Gum grass shrub forest on Coastal Lowlands of the Central Coast (=HU803); 5.3 ha of Blackbutt – Narrow-leaved White Mahogany shrubby tall open forest on coastal ranges, northern Sydney Basin Bioregion (=HU507); and about 6.6 ha of Blackbutt – Turpentine – Sydney Blue Gum mesic tall forest

on ranges of the central Coast (=HU782). Surveys for the parcel of land also identified that it contained suitable habitat for the Little Bentwing Bat.

The proponent used the BioBanking Credit calculator to quantify the biodiversity values of both the impact area and the biodiversity offset area and found that the offset generated sufficient quantity of ecosystem credits that were able to be traded with the ecosystem credits produced by the development site (RPS, 2016b).

OEH met with representatives from Centennial Coal on 8 March 2016 to discuss the project. During the meeting the proponent discussed their intent to secure the biodiversity offset for this project by a Property Vegetation Plan under Part 4 of the *Native Vegetation Act 2003* and to include the offset in Centennial Coal's existing 'Land Management Strategy'. As outlined in a letter from the OEH Chief Executive to the Minerals Council (signed 5 January 2015), biodiversity offsets may be secured under such a mechanism during the transitional implementation of the NSW Biodiversity Offsets Policy for Major Projects, as was done for the Mandalong Southern Extension Project. It should be noted that securing biodiversity offset land this way, rather than by a BioBanking Agreement, means that the ecosystem credits and species credits calculated for the offset land do not technically exist, and thus any surplus credits from the offset land are not available to trade for other projects.

After reviewing the SEE, OEH confirms that the proposed biodiversity offset meets the transitional biodiversity offsetting requirements. OEH recommends that any consent given for this project includes a consent condition that requires the provision of the offset package as described in the Appendix 7 of the SEE.

If you have any further questions in relation to this matter, please contact Robert Gibson, Conservation Planning Officer, on 4927 3154.

Yours sincerely



9 MAY 2016

RICHARD BATH
Senior Team Leader Planning, Hunter Central Coast Region
Regional Operations

References:

RPS (2015) *Aboriginal Heritage Impact Assessment. Appendix 10 Mandalong Mine Transmission Line TL24 Relocation Project: Statement of Environmental Effects. Statement. November 2015.* RPS Australia East Pty Ltd, Hamilton.

RPS (2016a) *Flora and Fauna Impact Assessment. Appendix 6 Mandalong Mine Transmission Line TL24 Relocation Project: Statement of Environmental Effects. Statement. February 2016.* RPS Australia East Pty Ltd, Hamilton.

RPS (2016b) *Biodiversity Assessment Report. Appendix 7 Mandalong Mine Transmission Line TL24 Relocation Project: Statement of Environmental Effects. Statement. February 2016.* RPS Australia East Pty Ltd, Hamilton.