

Mr David Ellwood
Director NCO Stage 3 Project
10 Kurrajong Creek Road
BAAN BAA NSW 2390

22/12/2020

Dear Mr Ellwood

**Narrabri Underground Mine Stage 3 Extension Project (SSD-10269)
Response to Submissions**

The exhibition of the development application including the Environmental Impact Statement (EIS) for the Narrabri Underground Mine Stage 3 Extension Project ended on 16 December 2020.

All submissions received by the Department during the exhibition of the proposal are available on the Department's website at: <https://www.planningportal.nsw.gov.au/major-projects/project/10731>

Advice from the Department's Water Group, Forestry Corporation of NSW and Heritage NSW is yet to be received. Additional agency advice will be provided to you as soon as possible.

The Department requests that you provide a Submissions Report, which responds to the issues raised in agency advice and submissions, in accordance with clause 82(2) of the *Environmental Planning and Assessment Regulation 2000*. Please provide a response by 8 March 2021.

Based on its consideration of the EIS and the submissions and advice received to date from State and local Government agencies, special interest groups and the general community, the Department considers that key assessment issues for your project include the following:

- subsidence impacts and related environmental consequences, including:
 - drawdown within saturated alluvium and porous rock aquifers and resultant impacts on:
 - groundwater dependent ecosystems, including springs;
 - riparian vegetation;
 - privately owned bores; and
 - agricultural productivity and land value;
 - subsidence impacts on native vegetation;
- additional assessment of potential impacts on groundwater dependent ecosystems (including stygofauna);
- scale of the project's Scope 1 greenhouse gas emissions;
- opportunities to reduce clearing associated with pre-mining drainage of seam gases;
- consideration of the requests by Narrabri Shire Council and Gunnedah Shire Council that your company enter into voluntary planning agreements;
- review of the potential cumulative impacts of the project with the Narrabri Gas Project, now that that the latter is approved and subject to identified conditions;
- confirmation of the number, location and use of all affected privately-owned bores;
- further assessment of the project's road transport impacts, in accordance with the advice received from Transport for NSW; and
- finalisation of the BDAR in accordance with the advice received from the Department's Biodiversity, Conservation and Science Directorate.

While you are requested to carefully consider and respond to all issues raised in all submissions, the Department notes that a number of submissions contain key commentary and requests for

further information and/or assessment in respect of the above issues. These submissions include those from the:

- Commonwealth Independent Expert Scientific Committee;
- Department's Biodiversity, Conservation and Science Directorate;
- Transport for NSW
- Narrabri Shire Council;
- Gunnedah Shire Council;
- Lock the Gate;
- Leard Forest Research Node; and
- Boggabri and Baan Baa Landowners.

Note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact Philip Nevill on 02 8275 1036 or philip.nevill@planning.nsw.gov.au.

Yours sincerely



Stephen O'Donoghue
Director
Resource Assessments

as delegate for the Planning Secretary