



26 August 2016

Gary Brassington
Principal Approvals
Illawarra Coal Holdings Pty Ltd
Illawarra Coal Couth32 Innovation Campus
PO Box 514
UNDANDERRA NSW 2526

Application for a Section 75W Modification of the Bulli Seam Operation Approval – Appin East Mine Safety Gas Management Project

Thank you for your invitation to provide comment on the Appin East Mine Safety Gas Management Project (MSGMP). It is understood that approval is being sought to construct and operate a 1m diameter suction gas pipeline between Appin Mo. 3 Vent Shaft and the gas drainage plant at Appin No. 2 for four kilometres along Brooks Point Road, in order to extract and utilise methane gas to improve safety and efficiency of coal extraction. The comments below relate to the Environmental Impact Assessment and proposed management activities that are outlined in report prepared by Niche Environment and Heritage dated 17 June 2016.

Campbelltown City Council has been actively involved in commenting on the Bulli Seam Operations since the project inception, and the consultation process for the review of the MSGMP project application and involvement of Council in this process is appreciated.

The project site is located upstream of the Campbelltown Local Government Area (LGA) within the catchment of the Nepean River near the southern extent of the Cumberland Plain. Potential impacts on the extent and condition of the ecosystems characteristic of the area attributable to this project, in particular Critically Endangered Cumberland Plain Woodland and a number of threatened species of fauna, are of high relevance to the Campbelltown LGA and of concern to Council.

The Environmental Impact Assessment has not recognised that part of the site is mapped as being of high biodiversity and connectivity value by the Office of Environment and Heritage's Biodiversity Investments Opportunities Map (BIO Map, 2015). BIOMAP partially maps the vegetation along Brooks Point Road as a Priority Investment Area, being part of both a core area and a regional corridor. BIO Map outlines Priority Investment Areas as:

“those areas where the protection and management of native vegetation can be of greatest benefit to biodiversity”; core areas are “large remnants where management will be of greatest benefit to the conservation of key state and regional biodiversity values within a region”; and regional biodiversity corridors are “linear areas that link core areas and play a crucial role in maintaining connections between animal and plant populations that would otherwise be isolated and at greater risk of local extinction”.

It is therefore important that the removal of 0.45ha of Cumberland Plain Woodland, including vegetation within the above mapped areas and remnant regenerating roadside vegetation, is rehabilitated through a Vegetation Restoration Plan prepared and implemented with Wollondilly Shire Council as part of the Environmental Management Plan for the project.

In addition it is noted that despite suitable habitat being present (that will be removed by the project) that no targeted searches were undertaken for the Cumberland Plain Land Snail or for a number of species of micro-bats recorded within the locality, including the Eastern False Pipistrelle, Yellow-tailed Sheath-tail-bat, Large-footed Myotis, Eastern Freetail-bat and Little Bentwing bat.

In order to address the likelihood that these species may be impacted by the MSGMP works it is important that a Cumberland Land Snail Translocation Protocol and a Micro-bat Nest Box Plan is prepared and implemented with Wollondilly Shire Council as part of the Environmental Management Plan for the project.

If you require any further information or would like to discuss these matters further, please contact Council's Coordinator Environmental Planning, Renee Winsor on 46454610.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Spooner', with a long horizontal stroke extending to the right.

Andrew Spooner
Manager Environmental Planning

cc: Wollondilly Shire Council