



19 October 2015

DOC15/402678  
08\_0144 Mod5

Ms Rose-Anne Hawkeswood  
Planning Officer, Resource Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Rose-Anne

**Narrabri Coal Project Modification 5 - Notice of Exhibition (08\_0144 Mod 5)**

Thank you for your email dated 24 September 2015 requesting the Office of Environment and Heritage to provide any comments regarding the environmental assessment (EA) for the proposed modification.

We note that the EA states that the surface disturbance footprint will remain unchanged, and the 210.5 ha of native vegetation currently approved for clearing for mine associated infrastructure would not increase. We also note that the modification will result in approximately an additional nine hectares of vegetation being impacted by the underground footprint. The vegetation occurs on elevated land where less subsidence impacts are predicted due to a greater depth of cover. Approximately 11 hectares less land will be affected in the on-site offset area and an additional 13 hectares will be affected in the Pilliga East State Forest.

The current offset package accounts for direct impacts from native vegetation clearing, and indirect impacts linked to subsidence. We do not consider the additional area of impact of nine hectares to be a substantial increase compared to the original footprint and we believe that the existing offset package will adequately account for any potential subsidence-related impacts to native vegetation.

We also note that the death of large trees have been observed in association with LW101 and LW102. The Narrabri Coal Biodiversity Offset Strategy (2010) predicted subsidence would impact on approximately 10 per cent of the native vegetation in the subsidence zone, equating to 202 hectares. Although the extent of the tree death is unclear it does not appear to be extensive. Whilst ever the subsidence-related impacts continue to fall within the predicted total of 202 hectares, future tree deaths are appropriately investigated, and natural regeneration continues to occur we do not have ongoing concerns.

We note that targeted surveys identified no Aboriginal heritage sites or Aboriginal cultural heritage values within the modification footprint.

In conclusion, as a result of our review of the publicly exhibited EA we have no specific recommendations or amendments that we wish to be considered.

Should you require further information regarding this issue please contact Renee Shepherd, Conservation Planning Officer on (02) 6883 5355.

Yours sincerely

A handwritten signature in black ink, appearing to read 'SArdill'.

**SONYA ARDILL**  
**Senior Team Leader Planning, North West Region**  
**Regional Operations**

Contact officer: RENEE SHEPHERD  
02 6883 5355