



**Office of
Environment
& Heritage**

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Stephen Shoesmith
Senior Planning Officer, Resource Assessments
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Shoesmith

Woodlawn Mine Project Approval 07_0143 Modification 1 for the relocation of the underground mine entry

I refer to your email, received by the Office of Environment and Heritage (OEH) on 9 February 2016. I understand you are seeking comment on the above modification and you have requested comments and recommendations, on the report titled "Woodlawn Mine Environmental Assessment" (the EA) dated January 2016, and the Project Approval dated 4 July 2013.

I understand that the modification is to relocate the approved mine entry box cut site and Paste Fill Plant to the western side of the mine, upgrade an existing road between the new mine entry and processing plant, and minor site layout adjustments in the Hickory Paddock area to allow for the relocation of the box cut and mine entry.

We have reviewed the information provided for the modification proposal and whilst there are no concerns regarding impacts from the modification proposal itself, particularly as the area is already highly disturbed, we have some concerns regarding the preparation of the Vegetation Management Plan, Heritage Management Plan and the proposal to modify the biodiversity offset area. In summary, the concerns are;

1. We have not been consulted in relation to the development of the Vegetation Management Plan as required by condition 20 of the project approval. Although construction has not commenced yet, OEH is concerned that we have not been involved in the preparation as page 33 of the EA states that the Vegetation and Rehabilitation Management Plan is currently in preparation".
2. We have not been involved in the development of the Heritage Management Plan as required by condition 27 of the project approval. The EA states that the Statement of Commitments and Heritage Management Plan will address the stop work processes if heritage items are encountered, but OEH are concerned that there has been no consultation to date.
3. The EA states that the proponent is not seeking to modify the currently approved location for the biodiversity offset, but rather flag that the future Vegetation Management Plan required under condition 20 of schedule 4 may nominate a different area. The proponent will need to provide further information as to why the offset area would be modified from the original approval.

Further comments are provided in attachment A and B.

Given the concerns raised above, OEH requests that the proponent consult with us, in accordance with the project approval conditions, so that we can assist in the development of the management plans as per the project approval, and to discuss the modification to the biodiversity offset area.

If you require further information or would like to discuss the above comments further, please contact Lyndal Walters on 02 6229 7157.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Allison Trewick', with a stylized flourish at the end.

ALLISON TREWEEK 4/3/16
Senior Team Leader, Planning - South East
Regional Operations Group
OFFICE OF ENVIRONMENT AND HERITAGE

Attachment A – Detailed comments on Aboriginal Cultural Heritage matters for MOD 1 – Woodlawn Mine

OEH notes that an archaeological assessment was undertaken for the Mine site in 2008 and again in 2011, and that no Aboriginal sites were found.

However, while there are no Aboriginal sites listed on AHIMS within the areas proposed for modification, it is a condition of the Project Approval, dated 4 July 2013, that the Proponent prepare and implement a Heritage Management Plan (HMP) in consultation with OEH. To date, OEH has not been provided with a copy of the HMP for comment, nor have they been involved in the development of the HMP.

OEH also notes that the Revised Statement of Commitments, under 1B in Table 4.1 on page 23, refers to the preparation of a Construction Environmental Management Plan (CEMP) being prepared to manage impacts on the environment during the construction phase and includes a section on Aboriginal heritage management.

OEH has concerns over the timing of the preparation of the plans and notes that Condition 27(b) of the Project Approval states that the Heritage Management Plan (HMP) must be approved prior to commencing construction on site.

Attachment B – Detailed comments on biodiversity matters for MOD 1 – Woodlawn Mine

OEH accepts that the location of the proposed box cut will not result in any vegetation being cleared as it has been moved to a highly disturbed area.

OEH understands that the modification is to relocate the approved mine entry box cut site and Paste Fill Plant to the western side of the mine, upgrade an existing road between the new mine entry and processing plant, and minor site layout adjustments in the Hickory Paddock area to allow for the relocation of the box cut and mine entry.

Vegetation Management Plan

Page 33 of the EA states that the Vegetation and Rehabilitation Management Plan is currently in preparation. OEH has concerns over the following;

1. That OEH have not been consulted with in the development of the Vegetation Management Plan as per condition 20 of the project approval.
2. That the EA refers to what appears to be a plan titled Vegetation and Rehabilitation Management Plan which appears to be a combination of the Vegetation Management Plan and the Rehabilitation Management Plan. The development consent clearly requires two separate plans.

Biodiversity Offset changes

The EA states that the “original location offset is not favoured and an equivalent area to the west or north of the bioreactor which currently has a large introduced pine plantation is the preferred location”. Furthermore the EA states that the proponent is not seeking to modify the currently approved location but rather flag that the future Vegetation Management Plan required under condition 20 of schedule 4 may nominate a different area for the biodiversity offset.

OEH is concerned that there is a modification to the offset area proposed and would like further information from the proponent on what changes they are proposing.

OEH also queries why the map in the development consent, which sets out the biodiversity offset area, has been split into Area A and Area B, and what these areas define.