



Brockmann Eco-Consulting (BEC)



Friday, 6 November 2015

The Hon. Rob Stokes, MP
The Minister for Planning & Environment
GPO Box 5341
SYDNEY NSW 2001

To the Hon. Rob Stokes MP,

Enclosed for your consideration lies a submission pertaining to public comment with regards a development application for the locality of Bylong in the Upper Hunter Region. The submission forms comment on the Environmental Impact Statement (EIS) prepared for the proponent in relation to planning under Division 4.1 of Part 4 of the EP&A Act, 1979.

The local community of the Bylong township has gathered together in opposition to the proposal with the support of regional stakeholder engagement for the conservation of the landscape values, ecology, water and heritage for the locality. Our association with Bylong is the location of the homestead approximately 30km east along the Bylong Valley Way. With studies at the UNSW in 1992, the submission forms an initial engagement as a small business registered in June 2015. Experience with NSW Public Works includes assistance with two EIS projects, education projects with the Government Architect, and a study of ecological and catchment planning with Sydney Water over a five year timeframe.

Of principle concern for consideration of the environment lies with regards the value of the location between the Goulburn River and Wollemi National Parks. This location represents an extraordinarily biodiverse region with over 130 individual species of birds identified in the ecological assessment. A large area (~750ha) of bushland is at risk, comprising threatened ecological communities (TEC's), including the River Redgum, subsequently risking at least 17 individual species of birds (listed in the Threatened Species Conservation (TSC) Act, 1995 as endangered or vulnerable). Careful consideration of threat abatement planning should be provided for in the development application process.

With relevance to the ecology and existing agriculture, are the flow and water quality in the locality. Both surface water and groundwater were assessed, with comment included in the report. Salinity increases are a concern, whilst the run-off in the localised

catchments is being discounted from the regional context, affecting the ecology. There are traces of iron, manganese and zinc that are above trigger values from ANZECC guidelines, and this may worsen following development. Importantly, the groundwater is forecast to reduce by at least 2m, a matter that is not rare in the assessment, in the area of the River Redgum habitat, and risking the ecology.

Whilst the consideration of all matters pertaining to the project is essential, the heritage with regards to churches in the township, and historical structures should not be overlooked. There was no mention of alternative churches in the main EIS document, at the very least. The measures suggested only considered recording and documenting these sites before development. The siting of the Upper Bylong Public School is of intrinsic concern for assessment.

Finally, reference should be made for consideration of the main focus, that for implementation of mitigation measures for risk to habitat. With a proposal to establish a threat abatement plan for the species and ecological communities at risk, could also be linked a bushland regeneration plan to establish nursery development and remnant bushland recovery for any losses that occur.

With consideration of the report enclosed, the management of ecology and water systems should be considered before determination on the development application process. In particular, the comments on the EIS from all the relevant stakeholders must form the decision making basis for the Community of the Bylong locality, the people of the Upper Hunter region and for NSW in general in the assessment of coal for export in the overseas marketplace.

Thank you for the opportunity to provide the Department of Planning & Environment (DPE) with comments on the respective EIS for the coal mining proposal for the locality of Bylong. I look forward to assisting with any interpretation in the future of planning in NSW.

Please do not hesitate to contact me should you require further information. The technical content of my report is based on past projects of a similar nature. Thank you again.

Yours faithfully,



KRISTIAN BROCKMANN BE (Hons)
Brockmann Eco-Consulting (BEC)