

Our Reference: 1829496:CS  
Your Reference: 1829496  
Contact Name: Cara Stoltenberg

Mr. Philip Nevill  
NSW Department of Planning, Industry & Environment

Emailed: [Philip.nevill@planning.nsw.gov.au](mailto:Philip.nevill@planning.nsw.gov.au)

Wednesday, 16 June 2021

**RE: SSD-10269 – NARRABRI UNDERGROUND MINE STAGE 3 EXTENSION  
PROJECT – KURRAJONG CREEK ROAD, BAAN BAA**

Dear Mr Nevill,

Thank you for the opportunity to make a further submission in response to the abovementioned application for State Significant Development (SSD) SSD-10269. It is understood that the development will involve:

- extension of the existing underground mine to gain access to the coal reserves in Mining Lease Areas 1 and 2,
- increasing the life of the mine to 2044, and
- development of supporting surface infrastructure.

The existing SSD consent (08\_0144) would be surrendered as part of this application with all relevant approval activities transferred to the new consent as part of this application.

Council previously provided comments on 16 December 2020. The Department of Planning, Industry and Environment (DPIE) has since received a Response to Submissions Report and Amendment Report for the Narrabri Underground Mine Stage 3 Extension Project.

Council has reviewed the documentation and provides the following additional comments:-

#### **1. Introduced Bush Fire Impact**


It is noted that Narrabri Coal Operations Pty Ltd (NCOPL) agreed they would provide a minimum separation distance of 100m from all dwellings at the time revegetation works are being carried out. It is requested that a condition be imposed requiring this.

#### **2. Road Maintenance**

Council acknowledges that NCOPL proposes to seek reclassification of the section of Kurrajong Creek Road and the highway intersection to be a gazetted B-double route. NCOPL has initiated this process with NSC, who has indicated that NCOPL must lodge a permit request with the National Heavy Vehicle Regulator (NHVR). Once this request is made, the NHVR will be individually assessed by NSC prior to issue. NSC does not have any in-principle issues with the use of B-doubles on Kurrajong Creek Road. However, the existing consent to be surrendered includes a condition (Schedule 4 Condition 25) that



  
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requires:

"The Proponent shall maintain the Mine Access Road Intersection with Kurrajong Creek Road and the Kamilaroi Highway in consultation with NSC and to the satisfaction of RMS."

Council requests that a similar condition be included on any new consent issued for the proposed development.

### **3. Road Transport**

Council acknowledges that NCOPL propose that all coal transported off site is to be by rail and not the road network. It is requested that a condition be imposed on any consent issued to only permit the transport of coal off site by rail.

### **4. Contributions**

The existing consent to be surrendered incorporated a Voluntary Planning Agreement (VPA). The applicant has not made an offer for a VPA as part of this application. As previously advised as per our input into the SEARS and Council's previous comments dated 16 December 2020, Council is amenable to further discussions regarding a VPA for this project with the proponent.

Further, if no VPA is entered into it is requested that a condition be imposed requiring payment of contributions in accordance with Narrabri Shire Council's Section 7.12 Fixed Development Consent Levies Contributions Plan 2011.

### **5. Cumulative Impacts**

Council acknowledges that NCOPL has consulted with Santos regarding its Narrabri Gas Project, located adjacent to the Narrabri Mine. NCOPL would continue to liaise with Santos regarding the Project including any potential cumulative subsidence impacts with Santos-owned infrastructure.

Council requests that the relevant State Government Department/Agency satisfies itself that there are no cumulative impacts as a result of the interaction of the proposed development and the adjacent Narrabri Gas Project.

### **6. Mitigation Measures**

It is requested that the mitigation measures as outlined in the EIS are to be conditionally required to be complied with as part of any consent issued.

Council expects that the assessment of the project will be carried out pursuant to all applicable legislative requirements and that these comments will be considered in the continued assessment of this application.

If you require any further information, or wish to discuss these matters further, please contact Mrs Cara Stoltenberg, Strategic and Major Projects Planner, in the first instance on (02) 6799 6866 or [caras@narrabri.nsw.gov.au](mailto:caras@narrabri.nsw.gov.au).

Kind Regards,

A handwritten signature in black ink, appearing to read 'Stewart Todd', with a stylized, cursive script.

**Stewart Todd**  
General Manager