

Submission for: Narrabri Underground Mine Stage 3 Extension Project

Comments

Narrabri Shire Council

Message

Wednesday, 16 December 2020

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

Thank you for the opportunity to make a 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,
- increase 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 has reviewed the documentation submitted with the application and wishes to raise the following matters to be addressed by the applicant.

1. Introduced Bush Fire Impact

The rehabilitation and offset revegetation proposed will introduce new and different bushfire risks to the area. To ensure that the owners of the existing dwellings are not unreasonably burdened by the introduced bushfire risks resulting from revegetation, it is requested that all revegetation works be limited to provide a minimum separation distance of 100m from all dwellings, at the time the revegetation works are carried out.

2. Road Maintenance

The existing consent to be surrendered includes a condition (Schedule 4 Condition 25) that 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 the condition be included on any new consent issued for the proposed development.

3. Road Transport

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, 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

As part of the input to the Secretary's Environmental Assessment Requirements (SEARs) (letter dated 18 April 2019) Council requested consideration of the impacts (including risks) occurring as a result of the interaction of the proposed development and the adjacent Narrabri Gas Project.

Whilst the EIS has considered the cumulative effect of the two projects for many of the technical impact assessments, there does not appear that there has been any real consideration of the potential impacts of the underground mining on the gas project and its associated infrastructure. For example, will the proposed development impact on the integrity of the gas wells due to physical mining operations or subsequent subsidence impacts.

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

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

If you wish to discuss this matter, please contact Council's Planning and Environment Department on (02) 6799 6866.

Yours sincerely,

Stewart Todd
General Manager