



Office of Environment & Heritage

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SSD 4966 MOD 1

Ms Melanie Hollis
Planning Officer, Resource Assessments
Department of Planning and Environment
melanie.hollis@planning.nsw.gov.au

Dear Ms Hollis

RE: REVIEW OF THE STRATFORD EXTENSION PROJECT - STATEMENT OF ENVIRONMENTAL EFFECTS (SSD 4966 MOD 1)

I refer to your email dated 12 August 2016, seeking comments on the exhibited Stratford Extension Project Mod 1 Statement of Environment Effects (SEE) located approximately five kilometres south-east of Gloucester in the MidCoast local government area. The Office of Environment and Heritage (OEH) understands the EIS was on public exhibition from 17 August 2016 to 14 October 2016.

OEH has undertaken a review of the SEE titled *Stratford Mining Complex Statement of Environmental Effects: Main Report and Appendices A-F, prepared by Yan Coal*. OEH understands that this Modification relates to proposed interactions between Stratford Mining Complex (SMC) and the Rock Hill Coal Project (RHCP), and includes:


- transport of HHCP sized run-of-mine (ROM) coal through the SMC during daytime hours
- extension of SMS ROM pad to accommodate RHCP sized ROM coal
- extension of SMC heavy vehicle parking area
- processing of RHCP coal at SMC and transportation of the resulting product coal from the SMC to the Port of Newcastle
- extension of on-site haul roads to accommodate RHCP haul tracks
- an at-grade level crossing (and associated controls) constructed at the intersection of Wenham Cox Road and the private haul road.

The associated Rocky Hill Coal Project (SSD 5156) is treated in a separate application to which OEH has provided separate comment.

OEH has reviewed the SEE (and its appendices) for the proposed development in relation to threatened biodiversity, Aboriginal cultural heritage, and flooding / floodplain matters. OEH acknowledges that the SEE report has generally adequately addressed OEH's concerns for these matters. OEH supports the proposal, providing the minor comments and recommendations outlined in **Attachment A** are appropriately addressed.

If you require any further information regarding this matter please contact Steve Lewer, Regional Biodiversity Conservation Officer, on 4927 3158.

Yours sincerely



22 SEP 2016

RICHARD BATH
Senior Team Leader Planning, Hunter Central Coast Region
Regional Operations

Enclosure: Attachment A

ATTACHMENT A: OEH REVIEW OF THE STRATFORD EXTENSION PROJECT - STATEMENT OF ENVIRONMENTAL EFFECTS (SSD 4966 MOD 1)

THREATENED BIODIVERSITY

OEH has reviewed the Appendix titled *Appendix E: Terrestrial and Aquatic Ecology Assessment* (authored by AMBS Ecology & Heritage Pty. Ltd.) and provides the following comments.

OEH notes that the main impact on biodiversity from the proposal will involve the extension of the haul road on the Stratford Mine Complex to the Rocky Hill Coal Project, which involves crossing Dog Trap Creek. This will involve the disturbance of improved exotic pasture, revegetated mining landscape and a small strip of degraded riparian vegetation (associated with the aforementioned creek). The clearing the riparian vegetation will involve the removal of two *Casuarina cunninghamii* subsp. *cunninghamii* (River Oak) trees.

No threatened flora or populations were recorded on the subject site; and the subject area is considered potential habitat for the Grey-crowned Babbler and Southern Myotis. However, in relation to these faunal species the removal of degraded, predominantly exotic vegetation will not result in a significant impact. Furthermore, there is ample, untouched habitat nearby, which will not be impacted upon.

Technically the riparian vegetation (i.e. Riparian Forest – River Oak / Cabbage Gum / Broad-leaved Apple Riparian Forest) along Dog Trap Creek should be considered as ‘River-flat eucalypt forest on coastal floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions’ endangered ecological community, albeit a degraded one. This is based on its landscape position (i.e. floodplain), habitat assessment and floristic composition (as per the NSW Scientific Committee Determination). However, given its degraded state and that it is (or will be) adequately represented in previous biodiversity offsets for Stratford Mine and/or the proposed RHCP biodiversity offset area, OEH does not consider additional offsetting is required.

In summary, OEH concurs with the SEE, the impacts from the Modification are minimal and not significant with respect to biodiversity. OEH supports the mitigation measures outlined in Section 5 of the SEE. OEH recommends that these measures are captured in consent conditions if the Department approves the Modification.

ABORIGINAL CULTURAL HERITAGE

OEH has reviewed the *Stratford Mining Complex Statement of Environmental Effects, Appendix D, Stratford Mining Complex, Modification 1, Aboriginal Cultural Heritage Assessment, Prepared for Yancoal Australia Ltd, prepared by Niche Environment and Heritage, July 2016*. OEH supports the proposed management recommendations contained in the report to mitigate any potential harm to Aboriginal sites. This includes test excavations to identify and characterise potential sub-surface deposits within the Craven and Craven Variant A soil landscapes. OEH also supports the continued community consultation with all the Registered Aboriginal Parties for the life of the project, and the revision for the current Heritage Management Plan. OEH has no further concerns with respect to Aboriginal cultural heritage and the proposed modification proceeding.

FLOODING AND FLOODPLAIN MANAGEMENT

The proposal involves relocation of a proposed private haul road including construction of a new crossing over Dog Trap Creek. Relocation of a public road, Wenham Cox Road, also formed part of a previous approval.

No flood study has been undertaken in support of the above project. It is noted in the EIS that the nearest private property is sufficiently distant and at much higher elevation to ensure no flood impact on private property as a result of the proposed works.

The following consent conditions are therefore recommended:

- 1) Detailed design of the waterway crossing for Dog Trap Creek will require flood estimation to determine required level of service and to adequately determine velocities for design of erosion control measures at abutments and downstream of bridges.
- 2) Detailed design of Wenham Cox Road relocation will require flood assessment to ensure that the level of service for this road in a flood event is not reduced by relocation closer to the creek line. Design of the road should ensure that level of service remains unchanged.

OEH – SEPTEMBER 2016