SHENHUA WATERMARK COAL PTY LIMITED
神华沃特马克煤矿有限公司

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Director Assessment Policy
Systems & Stakeholder Engagement
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Email to: plan_comment@planning.nsw.gov.au

WATERMARK COAL PROJECT –
SUBMISSION ON DRAFT STATE-WIDE
BIOPHYSICAL STRATEGIC AGRICULTURAL LAND MAPPING

On 3 October 2013, the NSW Government released state-wide mapping of Biophysical Strategic Agricultural Land (draft State-wide BSAL mapping) for stakeholder review and comment.

This letter documents a submission from Shenhua Watermark Coal Pty Ltd (Shenhua Watermark) in response to the exhibition of the draft State-wide BSAL mapping, which it considers to be inaccurate in respect of land areas currently mapped as BSAL within its Additional Offsite Biodiversity Offset Area for the Watermark Coal Project (the Project).

Shenhua Watermark requests that the draft State-wide BSAL mapping be amended to remove all areas currently mapped as BSAL within its Additional Offsite Biodiversity Offset Area for the Project. The basis for this request is provided below.

As discussed in the Response to Submissions document for the Project, an Additional Offsite Biodiversity Offset Area has been included in the Biodiversity Offset Strategy for the Project. The Additional Offsite Biodiversity Offset Area comprises of two properties: Mount Erin and Glendowda-Currajong, encompassing a total area of 4,095 ha located approximately 50 km west of the Project Boundary, near Tambar Springs, NSW (see **Figure 1**).

The draft state wide mapping indicated the presence of BSAL (approximately 600 ha) on the Additional Offsite Biodiversity Offset Area.

The appropriateness of this draft mapping is discussed further below with reference to the key criteria for BSAL outlined in the *New England North West Strategic Regional Land Use Plan* (NSW Government, 2012) and the *Interim Protocol for Site Verification and Mapping of Biophysical Strategic Agricultural Land* (Interim Protocol) (OEH and DPI, 2013), published data, the cultivation history of the site and a reconnaissance level site inspection.

Land Capability

The land capability of the Additional Offsite Biodiversity Offset Area has been mapped by the Namoi Catchment Management Authority (CMA) (see **Figure 2**). This mapping shows the best land capability in the Additional Offsite Biodiversity Offset Area as being Class IV and V. Such classifications fail to constitute BSAL as BSAL requires a minimum Class III land capability classification.

Therefore, the Additional Offsite Biodiversity Offset Area should not be classified as BSAL.

Given the above there is no need to address the other factors in the Interim Protocol in detail but regardless we make the following comments:

Geology

The underlying geology of the Additional Offsite Biodiversity Offset Area is dominated by the Garrawilla Volcanics, which consist mainly of alkali basalt flows with very minor intervening mudstone and clastic rocks.

The Namoi CMA has mapped the majority of the Additional Offsite Biodiversity Offset Area as Basaltic Slopes and Hills and Black Earth Footslopes land management units.

The Basaltic Slopes and Hills typically consist of 8% to 20% slopes with shallow rocky soils. This land management unit is generally not suited to cultivation and within the Additional Offsite Biodiversity Offset Area, the land management unit consists of native grasses which only support moderate density grazing.

The sections of land under cultivation within the Additional Offsite Biodiversity Offset Area are typically used for forage and fodder crops and often within a naturalised pasture rotation. The cultivated land lies generally within the Black Earth Footslopes land management unit due to the more favourable topography and deeper soils, although much of the upper sections of the footslopes have moderate to high rock content.

Slope

The Interim Protocol specifies that BSAL soils must have a slope of less than or equal to 10%. **Figure 3** presents a slope analysis of the Additional Offsite Biodiversity Offset Area. As shown in this figure, over 45% of the land has slopes greater than 10%.

Notably, a large area mapped as BSAL in the western extent of the Additional Offsite Biodiversity Offset Area occurs on land with slopes significantly greater than 10% (see **Figure 3**). This demonstrates the coarse nature of the draft State-wide BSAL mapping. This again supports the view that the large area mapped as BSAL in the western extent of the Additional Offsite Biodiversity Offset Area should not be mapped as BSAL.

Rock Outcrop and Rock Fragments

The Interim Protocol specifies that BSAL soils must have surface rockiness where no more than 20% of the area has unattached rock fragments greater than 60 mm diameter.

Whilst rock outcrops were present in the upper slopes, our investigations showed there were several large sections of cultivated land which displayed greater than 20% unattached rock fragments greater than 60mm diameter.

This again supports the view that the large area mapped as BSAL in the western extent of the Additional Offsite Biodiversity Offset Area should not be mapped as BSAL.

Conclusion

The mapping by the Namoi CMA shows the best land capability in the Additional Offsite Biodiversity Offset Area as being Class IV and V. Accordingly, the site cannot be characterised as BSAL.

Shenhua Watermark submits that the draft State-wide BSAL mapping should be amended to remove all areas currently mapped as BSAL within its Additional Offsite Biodiversity Offset Area for the Project

Should you have any queries in relation to this letter, please contact myself on 02 6741 8800.

Yours faithfully

SHENHUA WATERMARK

Mark Howes
Environment Manager