



19 June 2015

Reference File: 15/112626

NSW Department of Planning & Environment  
GPO Box 39  
Sydney NSW 2001

[Online submission](#)

Dear Sir or Madam

**SUBJECT      Submission on Integrated Mining Policy**

I write in response to the exhibition of the above document and associated material on exhibition from May to July 2015.

Blue Mountains City Council (Council) considers that any mining development in the vicinity of or requiring transportation routes through the Blue Mountains should have no adverse effect on the Blue Mountains community and environment and the Greater Blue Mountains World Heritage Area.

Please find following our comments and recommendations reflecting these concerns with regard to the documents currently on exhibition:

Reference	Comment/recommendation
<b>Standard Secretary's Environmental Assessment Requirements (SEARs):</b>	
Page 11 Environmental Impact Assessment-Heritage	Recommend inclusion of new bullet point: "Demonstrate that any World Heritage Areas will not be adversely affected by the development". This will help ensure that the values of World Heritage Areas, including the Greater Blue Mountains World Heritage Area, are considered and any potential impacts addressed in the EIA process.
Page 19 Transport	Recommend text be clarified to refer to 'any affected local councils', as it may be interpreted to only consider the Local Government Area (LGA) where the development is proposed. The Blue Mountains LGA is a key transport route between Sydney and mining areas in Lithgow and further west.

<b>Mine application guideline:</b>  Page 7 Biophysical, environmental and heritage constraints	First bullet point suggested additional reference: Protected areas and areas of high environmental value, "including world heritage areas". Whilst protected under federal legislation it is considered important to include reference to World Heritage Areas in these EIS/mine application guidelines.
<b>Policy Framework for Biodiversity Offsets for upland swamps and associated threatened species</b>	The extension of the principle of applying biodiversity offsetting to upland swamps is not supported. The impact of subsidence from longwall mining on groundwater aquifers and upland swamp vegetation cannot be easily measured, nor effectively mitigated. Any such proposals that may impact upon the Blue Mountains World Heritage Area would be strongly opposed by the Council.

Please contact Ms Toney Hallahan, Program leader, Land Use Strategy on 4780 5740 or [thallahan@bmcc.nsw.gov.au](mailto:thallahan@bmcc.nsw.gov.au) should you have any further queries.

Yours faithfully



ANDY TURNER  
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