

Steve O'Donoghue

From: [REDACTED]
Sent: [REDACTED]
To: Rose-Anne Hawkeswood
Cc: [REDACTED]
Subject: Boggabri MOD 7 Submission - Objection

Dear Ms Hawkeswood,

[REDACTED] seek to educate the Narrabri and district community about coal and gas projects in the region. As such we try to participate in the many and varied government processes involved with these projects to ensure we are up to date on the issues and that our broader community who may not have time to participate in these processes have the opportunity to have their voices heard.

As such we wish to put forward a submission to the Boggabri MOD 7.

Whilst we understand that the proponent seeks to describe this as a "largely administrative" change, we are concerned that this sets a poor precedent for the future of these types of changes. We are worried that that these changes could have significant and long lasting impacts and are not given the full scrutiny that they require and are not viewed as part of the overall impacts to the region.

In particular we would like to draw your attention to two proposed changes.

Firstly, we draw your attention to the request for modification to the unspecified number of truck movements carrying coal to Gunnedah for the purpose of marketing and laboratory testing. We believe the cumulative impacts of such a modification have not been fully and properly considered. A concurrent modification sought by Tarrawonga Coal mine (which it seems to have managed to not receive any public comments or even agency comments on) should be considered alongside this modification and the cumulative impacts of both applications should be reviewed before a decision being made.

Secondly, the request by Boggabri Coal to modify condition 47(a) of the Project Approval has broader implications. This modification would give unfettered discretion to the Secretary of Planning, thus removing the time-limit for securing in perpetuity the biodiversity offsets required for the project. This change to the project condition will remove the time-limit for acquiring the biodiversity off-sets that seek to make up for the areas of the Leard Forest that have been destroyed by mining. This change would make room for the Secretary to defer in perpetuity the need to secure the offsets. Whilst this may not be the reason for this suggested change we believe it sets a dangerous precedent and should not be approved without a full and independent inquiry. These project conditions were set following a full assessment process and this particular condition was supported by very specific comments by the Planning Assessment Committee and should not be altered without the same level of rigor applied.

Our region is subject to a raft of State Significant projects that appear to have constantly shifting modifications. It is not apparent that any agency is taking an overall view of these changes and considering the full impacts. A simple search of the Department's Major Projects register using "Narrabri" as the key word will bring up no fewer than 16 live assessment processes happening at this time.

The Department of Planning's role surely is to take a long term view of sustainable planning in the region of all the projects and modifications currently underway. The constant approval of seemingly "minor" modifications erode the capability of the Department, experts and community to do take this overarching view, reflects a flaw in the planning process and appears to allow companies unfettered opportunities for expansion. We are sure you have heard of the concept of "approval creep"?

For these reasons [REDACTED] Objects to the Boggabri MOD 7 application and seeks a full, transparent and overarching review of the implications of these changes.

