



Our ref: OUT15/9481

Department of Infrastructure,  
Local Government and Planning

21 December 2015

Mr Stephen Downs  
Wesfarmers Curragh Pty Ltd  
Level 31 Central Plaza One  
345 Queens Street  
Brisbane QLD 4000

Dear Mr Downs

## RPI15/009/CURRAGHEXT – Curragh Extension Project (CEP)

### Requirement Notice *(RPI Act, s44)*

I refer to the assessment application, made on 15 December 2015 under section 29 of the *Regional Planning Interests Act 2014* (RPI Act), seeking a regional interests development approval.

#### Site details

Location	Blackwater Cooroorah and Oliffe Roads, Blackwater (6km north of Blackwater)
Real property description	Within ML700006 (Curragh South), ML700007 (Curragh Central) and ML 700008 (Curragh Central Extended):  Parts of the following Lots: Lot 1 on Plan RP613729, Lot 35 on Plan SP247242, Lot 12 on Plan HT493, Lot 2 on Plan SP223677, Lot 12 on Plan HT493, Lot 46 on Plan HT610, Lot 6 on Plan HT571  Parts of the following unnamed roads: Unnamed road on Lot 1 on Plan RP613729, unnamed road reserve in Lot 12 on HT493 and Lot 35 on SP247242 ( <i>unnamed road reserve /parcel# 37480064</i> ), temporarily closed roads in Lot 35 on Plan SP 247242 ( <i>temporarily closed road segment/parcel# 37480070</i> ) temporarily closed roads in Lot 35 on Plan SP 247242 ( <i>temporarily closed road segment/parcel# 37480071</i> ), temporarily closed roads in Lot 35 on Plan SP 247242 ( <i>temporarily closed road segment/parcel# 37480133</i> ).
Local government area	Central Highlands Regional Council local government area

**Notification Requirement**

You are advised that the above assessment application does **not** require notification under the *Regional Planning Interests Regulation 2014* (RPIA Act), Part 3, and Division 4.

**Information Requirement**

You are advised that in accordance with the RPI Act, Section 44, further information is required to enable the adequate assessment of the application against the RPI Act, Schedule 2, Part 4 (Strategic cropping area), Criteria for assessment. The requested further information is detailed in Attachments A and B.

To enable a speedy determination of this application, you are asked to provide the requested information as soon as possible and within a maximum of 12 months after the day you receive this notice. You may request an extension to this period, if necessary.

**Application details**

Confirmation of the application details in Appendix 1 is required to enable a future decision notice to accurately reflect the location and extent of the activities proposed in the application.

If you require any further information, please contact Mitzi Venn, RPI Act Development Assessment Team on 3452 7609 or [RPIAct@dscip.qld.gov.au](mailto:RPIAct@dscip.qld.gov.au) who will be pleased to assist.

Yours sincerely



**Kylie Williams**  
**Executive Director**  
**Regional and Precinct Planning**

## ATTACHMENT A

### Information required for assessment against the SCA criteria

#### In relation to RPI Regulation, Schedule 2, Part 4, Require Outcome (RO) 1

From the application it is evident that the application is seeking to establish that all 855.84 hectares of land that is presently identified as Strategic Cropping Land and within the proposed disturbance footprint of the extension to the Curragh Mine, fails one or more of the criteria for Strategic Cropping Land (i.e. the SCL Zonal Criteria).

An initial assessment has been undertaken of the information provided in the reports supporting the subject application. Those supporting documents are:

- *Regional Interest Development Approval Strategic Cropping Area: Curragh Extension Project* (Wesfarmers Curragh Pty Ltd, dated December 2015);
- *Strategic Cropping Land Assessment: Curragh Extension Project* (WSP/Parsons Brinckerhoff, dated 22 July 2015); and
- *SCL Supplementary Report – Curragh Extension Project: Strategic Cropping Land Assessment* (SLR Consulting, dated 28 November 2015).

That assessment indicates the applicant contends:

- a) All of the subject SCA can be treated as a single soil map unit, with a Self-mulching Brown Vertosol as the dominant soil, and a Self-mulching Black Vertosol and Eutrophic Brown Dermosol as sub-dominant soils incapable of being mapped as separate soil map units;
- b) In respect to compliance with the eight SCL Zonal Criteria, the status applicable to the 24 observation sites on the subject SCA is as follows:
  - i. Fourteen sites (i.e. 7, 8, 10, 13, 16, 39, 43, 48, 49, 51, 50, 55, 57 and 66) fail to comply with one or more of the SCL Zonal Criteria;
  - ii. Seven sites (i.e. 9, 11, 45, 54, 56, 59 and 72) are non-compliant by 'correlation' with the sites listed in item i; and
  - iii. Three sites (i.e. 12, 47 and 62) do comply with the SCL Zonal Criteria, but as they are all located, along with the sites listed in items i and ii (above), within the single Self-mulching Brown Vertosol soil map unit, these sites are considered not to affect the overall compliance status of that soil map unit.
- c) Some 24.4 ha of land within Lot 35 SP247242 and Lot 2 SP223677 fail Criterion 1 (Slope), and that these areas of land are extensive enough to conform to the minimum map unit area in the Western Cropping Zone, of 10 ha, as specified in Table 3 of *RPI Act Guideline 08/14*.

Having reviewed the submitted material, and data and information gather from other sources, the Department of Natural Resources and Mines has reached the following conclusions:

- i. Based on the information provided in the submitted reports, it would appear that only ten sites (i.e. 7, 8, 13, 16, 39, 49, 50, 51, 66 and 72) fail one or more of the SCL Zonal Criteria, with all ten sites appearing to fail Criterion 8 (Soil water storage), seven sites (i.e. 7, 13, 16, 39, 49, 51 and 66) appearing to fail Criterion 7 (Salinity) and one site (i.e. 50) appearing to fail Criterion 6 (Soil pH).

- ii. The Curragh Central Extended and Curragh South project areas are over 10 kilometres apart and the suggestion that they represent a single map unit cannot be sustained simply on the basis of that separation distance, and the absence of any data characterising the intervening land.
- iii. A detailed review of the Department of Natural Resources and Mines' 1:100 000 surface geology mapping, 1:100 000 pre-clearing vegetation mapping, aerial photography, satellite imagery and radiometric survey data; and the CSIRO (1967) 1:500 000 land system and soil 'families' mapsheets covering the Isaac-Comet area; as well as the soil descriptions and chemical and physical analysis data in the submitted application; would collectively suggest it is likely at least three, and possibly more than seven mappable soil units can be delineated in the subject area of SCA, and that not all of these soils units would necessarily be non-compliant with the SCL Zonal criteria.
- iv. While it could be expected that a number of soils identified in the submitted reports as Vertosols might ultimately prove to be such, the soil surface and profile descriptions provided for none of the 20 observation sites identified as Brown or Black Vertosols include evidence that would necessarily confirm that classification (i.e. cracks >5mm wide that extend upward to the surface or plough layer, and having slickensides and/or lenticular beds present at some depth in the solum).
- v. Observation sites 43, 50, 55 and 72 are claimed to be non-complaint with Criterion 4 (Soil depth), yet the profile description for site 72 describes a B horizon extending to 0.9 m depth; while those for sites 43, 50 and 55 describe BC horizons extending to 1 metre or more, where the descriptions of those horizons do not presently include sufficient detail to disqualify those soils on the basis of the definition of soil depth provided in s14 in Schedule 3 of the *Regional Planning Interest Regulation 2014*.
- vi. Slope analyses based on digital elevation data available to the Department of Natural Resources and Mines (e.g. 1-sec grid, hydrologically corrected SRTM DEM data and 1:50 000 10 m contour data) has not been able to replicate the revised exclusion area mapping in Figure 1 of the supplementary report, and it remains uncertain that any areas having slope gradients greater than 3% and extents greater than 10 ha (i.e. mappable exclusion areas) are likely to occur within the subject SCA.
- vii. The site and soil profile at observation site 48 are both described, but no spatial or other information was provided in respect to that site; whereas a site 58 is identified in the submitted mapping, but no site or soil profile description was provided; and
- viii. Without additional data and information addressing the preceding points it is difficult to conclude that any more than 523 ha of land within the subject SCA (and identified in the attached Map 1 and Map 2) are likely to be capable of being demonstrated as non-compliant with the criteria for Strategic Cropping Land, when using the methodologies and guidelines specified in *RPI Act Guideline 08/14*.

**Requirement:** Unless the applicant is prepared to accept a decision on the subject RIDA application consistent with extents of the land able to be demonstrated as not meeting the criteria for Strategic Cropping Land being confined to the area identified as 'Provision Non-SCL' in the attached Map 1 (Curragh Central Extended project area) and Map 2 (Curragh South project area), it will be necessary to provide supplementary information and data that suitably addressed the matters raised in items i to viii (above). To be

acceptable, the methodology employed in producing or gathering any supplementary information must be consistent with *RPI Act Guideline 08/14*, and any guidelines, manual or standards referenced in that document.

## APPENDIX 1

To enable the issuing of a decision notice that succinctly identifies the resource activities, their location and the area of disturbance:-

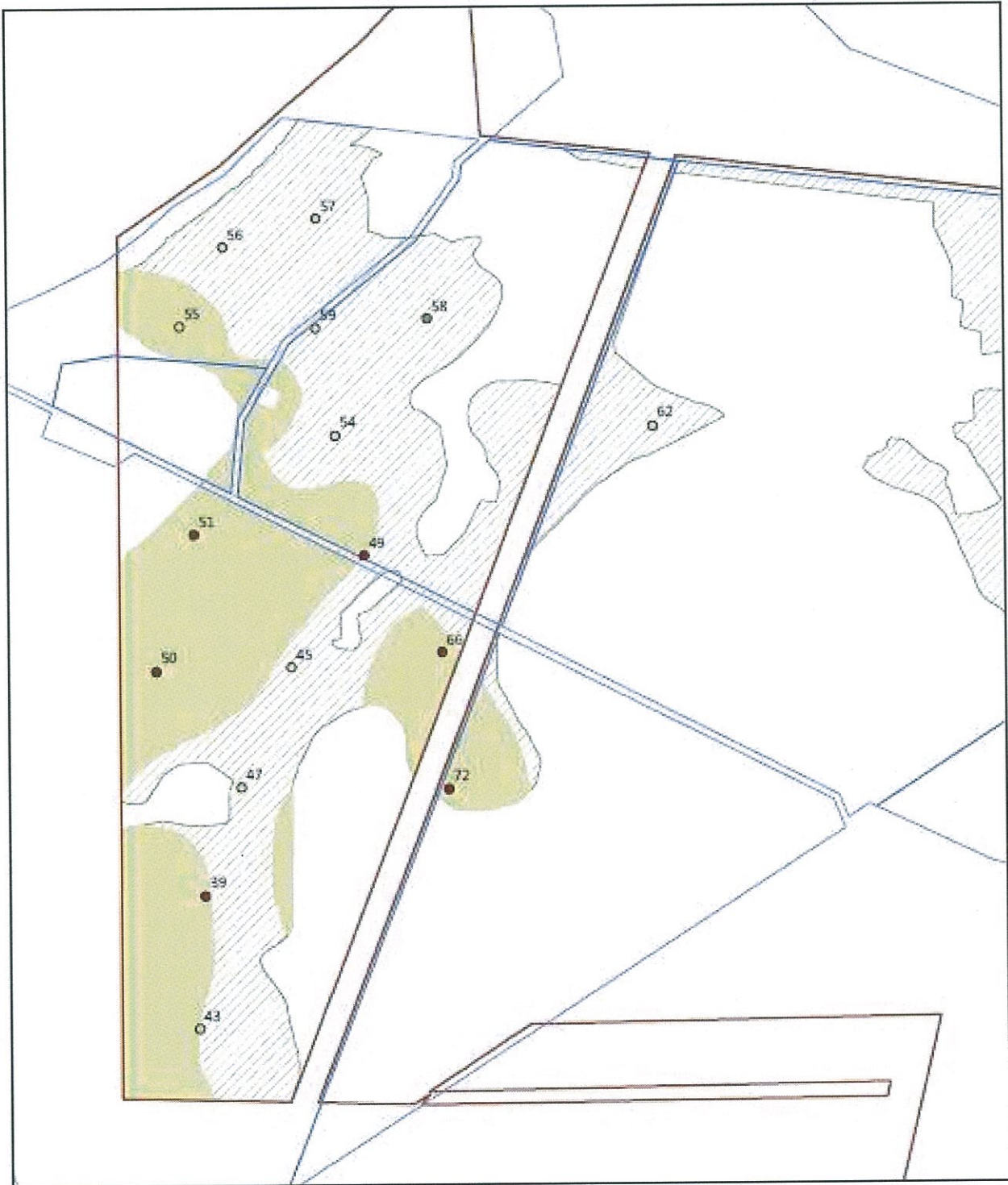
1. complete column 4 of Table 1 below, that details the total area of disturbance for each of the resource activities on each lot
2. confirm the definitions in Table 2 are an accurate description of the resource activities proposed in the application.

**Table 1**

Area of regional interest	Resource activity	Location	Total area of disturbance
Strategic cropping area	<ul style="list-style-type: none"> <li>• Spoil dump</li> <li>• Sediment dam</li> <li>• Protection levee</li> <li>• Haul road</li> </ul>	tba	tba

**Table 2**

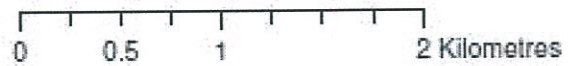
Resource activity	Definition of terms
Spoil dump	A pile built of accumulated overburden or other waste as it is removed during mining
Open cut mining pit	An open pit or trench at the surface from which rock or minerals is extracted. Includes supporting infrastructure such as haul roads, bunding, soil stockpiles, hardstands and water management structures
Run of mine	Stockpiles of raw coal and product removed from the pit and includes associated infrastructure required to deposit and transport the product.
Sediment dam	The banking of sediment to create a hold area for water to manage erosion and sediment run off
Associated infrastructure	Includes plant and equipment, access roads
Protection levee	Manmade embankment to provide immunity during a 1:1000 AEP flood event



**Map 1: Curragh Central Project Area - Provisional Non-SCL**

**Legend**

- |   |   |
|---|---|
| <b>Investigation sites</b>  |  Lot                 |
| <b>Status</b>   |  MDL                 |
|  Non-SCL   |  Provisional Non-SCL |
|  Undecided |  SCL                 |
|  Other     |   |





**Map 2: Curragh South Project Area - Provisional Non-SCL**

**Legend**

- Investigation sites**
-  MDL
  -  Provisional Non-SCL
  -  SCL
- Status**
-  No data
  -  Non-SCL
  -  undecided
  -  Lot

