

Mining and Industry Projects  
NSW Department of Planning & Infrastructure  
GPO Box 39  
Sydney NSW 2001

19 May, 2014

Dear Sir/Madam,

**State Significant Project – Angus Place Mine Extension (SSD 12\_5602)**

The Nature Conservation Council of NSW (NCC) is the peak environment body for New South Wales, representing over 120 organisations across the state. We have long-standing experience in state environmental assessment and planning and are extremely concerned with the proposed extension of underground longwall mining at the Angus Place Colliery. This project will adversely impact on important terrestrial and stream environments in 2,638 hectares of Newnes Plateau in this significant part of the Gardens of Stone region. Centennial Coal must not be allowed to simply replicate the damage it has already caused to nationally threatened upland swamps on the Newnes Plateau for which it was required by the Commonwealth Government to pay \$1.45 million in reparations.

The Angus Place and the adjoining Springvale mine extension proposals require further detailed consideration and must be subject to a Planning Assessment Commission review with concurrent public hearings. The hearing process should also take place over an extended period and allow for questions and answers.

The proposed clearing of 14 hectares of forest for an additional ventilation facility is excessive and its proposed location close to the Wolgan River is unacceptable. The proposed construction of seven de-watering facilities will fragment the public forest and significantly adds to the burden of infrastructure on Newnes Plateau in the Gardens of Stone region.

Progressive rehabilitation undertaken by Centennial has proven ineffective and incomplete. Many tens of kilometres of access roads have not been closed and rehabilitated.

NCC objects to the proposed discharge of up to 43.8ML/day of untreated eco-toxic mine effluent to the Coxs River via the Springvale-Delta Water Transfer Scheme (SDWTS). This inappropriate discharge is inconsistent with the Sydney Catchment Authority Sydney Drinking Water Audit 2010 recommendations that require improved treatment of such licensed discharges.

The Wallerawang Power Plant is shut, possibly permanently, and the current proposal to supply cooling water is not viable. The enormous quantities of mine effluent, currently running at 8.4ML/day must be treated using reverse osmosis technology to remove all metals and salts. Any malfunction of SDWTS, such as following a bushfire, must not result in emergency discharges to the World Heritage Area via Wolgan River or Carne Creek but be reinserted underground into the mine.

All 2,638 hectares affected by the proposed longwall mining will be subject to surface cracking. Entire sub-catchments will be fractured to a depth of 15 to 20 metres. Surface groundwater aquifers will become more permeable and interconnected. Centennial predicts surface aquifer drawdown to be 10 metres under ridges to 0.5 metres under shrub swamps. This range seems to be an underestimate as the longwall mining proposed at Angus Place Mine is more intensive than at Springvale Colliery, but the same degree sandstone cracking and groundwater drawdown is predicted.

The sandstone strata supporting the 22 nationally endangered swamps, and particularly the 7 shrub swamps, will also develop a large number of fractures. Centennial predicts these cracks to be 5 to 50mm wide and 10 to 15 metres deep. All these nationally endangered swamps will dry out due to the lowered groundwater levels. The peat soils that support these swamps will then decompose. Over a period of years eucalypts and banksias will migrate into these dying swamps as they evolve into dry land communities. Carne Creek is currently in a pristine state, and its waters that flow through the Greater Blue Mountains World Heritage Area are of the highest standard. The extensive fracturing of the sandstone associated with longwall mining of headwater swamps will release high levels of metals, notably manganese and iron, polluting Carne Creek and making it run bright orange, just like the Wolgan River did once. Flows in Carne Creek will also become irregular.

The mining footprint must be significantly lessened and mining methods reduced in intensity to protect Carne Creek, pagodas, cliffs and the nationally endangered swamps of the proposal area.

The NCC is not satisfied that the impacts of mining activities could be managed and mitigated to an acceptable degree. Due to environmental threats, we urge the rejection of this proposal.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Katherine Smolski', with a stylized flourish at the end.

Katherine Smolski