

Submission: Angus Place Extension

Attn:

Date: 28-April-2020

Ref: ADG2020APE01

Major Projects

NSW Department of Planning, Industry and Environment

GPO Box 39, Sydney NSW 2001

320 Pitt St, Sydney 2000

Phone: 1300 305 695

Dear Sir/Madam

Re: Angus Place Extension Project (Application Number SSD-5602)

Submission by David Gray, having a long-standing connection with the Wolgan Valley and Newnes Plateau area.

I oppose the project in its current form, based on the potential to adversely impact significant hanging swamps (e.g. Twin Gully and Tri Star swamps) as well as fragile sandstone structures such as the Cathedral Cave.

It is noted that with modification, there remains an opportunity to support the local economy, maintain local jobs and provide coal to the adjacent Mt Piper powerstation, while demand remains as the electricity sector transitions. There is potential for this to be achieved whilst further protecting both the hanging swamp ecosystems and fragile sandstone features (cliffs, pagodas and caves). It is suggested that consideration be given to a combination of alternative mine designs and mining methods that reduce surface impacts in key areas in the south of the project area. A reduction in project life may provide an opportunity for not requiring the mining of a portion of the 1000 panel area, beyond LW1010, thereby protecting the cliffs and structures of the Carne Creek tributary.

Issues related to the impacts on the hanging swamps are well documented by others (and in the Amendment report). Further discussion on potential cave impacts and mine life follow:

Potential to impact the Cathedral Cave / Carne Creek tributary

A sandstone cave / overhang identified as the Cathedral Cave does not appear to have been specifically considered in project assessment. There is concern that the cave could be subject to “non-conventional subsidence movements” as characterised in Appendix G of the Amendment. The cave is in a steep valley, a tributary of Carne Creek, near the confluence of identified type 2 and 3 lineaments. The cave is immediately north of LW1011 and east of LW1012 and LW1013, beyond the 26.5 deg angle of draw but well within the 600m boundary. Consideration of the post-mining structural integrity of the cave is necessary, given the proximity of the mining operation, complex topography, proximity of significant lineaments and the risk/severity of possible subsidence related impacts.

Project life to 2053 is excessive

A mine life of in the order of 20 years would better align with the expected closure date of Mt Piper powerstation.

- The project proposal provides for mining operations up to 31 December 2053, noting that this date “This aligns mining operations at the Angus Place Colliery to the current projected life of the Mount Piper Power Station.”
- Information available from the Australian Energy Market Operator (AEMO) note the “Expected Year of Closure” for Mt Piper powerstation as 2042
- In a carbon constrained future, there is likely to be downward rather than upward pressure on powerstation life whilst a ~21 year project life provides significant certainty without precluding future proposals or modifications, should circumstances change
- A reduced mine life may provide opportunity to mitigate the environmental impact potential, inherent in the current project

NB discussion on mine life is based on publicly available Mt Piper powerstation closure information only. Cathedral Cave information is based on photos, GPS location data scaled against mine plans provided in the Amendment Report – final ground truthing not being possible due to the timing of the COVID-19 lockdown.