

## Gabrielle Allan

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**From:** sysadmin@interlated.com.au on behalf of Gardens of Stone <sysadmin@interlated.com.au>  
**Sent:** Thursday, 12 October 2023 3:48 PM  
**To:** Gabrielle Allan  
**Cc:** jrobens@interlated.com.au; keith.muir6@bigpond.com  
**Subject:** Angus Place mod 8 and West Coal Services mod 5 submission

I have made a reportable political donation:

I would like my name withheld: No

Keith Muir  
[keith.muir6@bigpond.com](mailto:keith.muir6@bigpond.com)  
48 Carlton St  
Katoomba, NSW. 2780

I am objecting to the proposal:  
Yes

To whom it may concern,

I am objecting to the proposed modification 8 for Angus Place and modification 5 for Western Coal Services. I have worked to protect the Gardens of Stone region and the Greater Blue Mountains World Heritage Area for over 30 years and have a close attachment to these areas. These modifications merit closer scrutiny than is possible under the modification process because they will damage matters of national heritage and pollute the Coxs River. The exhibition period started on the Friday before the long weekend and every Australian deserves public holidays off. Exhibition periods need to be extended when they fall over such long weekends by the addition of days to cover the holiday period.

There are three interrelated modifications on exhibition affecting the Gardens of Stone conservation area and the World Heritage Area. It is unfair and unreasonable to expect the public to be able to absorb the details of these proposals, integrate the issues and make considered submissions on all three. In fact it is close to impossible.

It is possible that the timing and release of these modifications is part of a deliberate strategy by Centennial Coal to avoid scrutiny.

The modifications 8 Angus Place, 5 Western Coal Services and 9 Springvale should not be approved in this piecemeal fashion. As the executive summary of the modification report for Angus Place and Western Coal Services explains that these modifications are a necessary activity for the development of the state significant Angus Place West proposal. The environmental impacts of these modifications are clearing part of the proposed major project activity.

The environmental damage that these modifications will cause shall obscure the future impacts of the Angus Place West proposal. The modifications will damage nationally endangered swamps and plants, as well as pollute the Coxs River. Centennial Coal then can claim that its Angus Place West proposal will have no additional impact. Centennial is trying to get around the intent and provisions of the Environmental Planning and Assessment Act, 1979.

If these modifications can't be withdrawn or refused, then I request modification proposals receive thorough scrutiny, including by the Federal Government, the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development, the NSW Independent Planning Commission and the Independent Expert Advisory Panel on underground mining.

The proposed pumping will lower the groundwater table by up to 30 metres. Pumping under modification 5 lowered groundwater by this extent. This lowering of the groundwater table was reported by Centennial in 2018 in its Coxs River Swamp review. The review, however, did not take account of far-field impacts of such pumping. These impacts

follow fracture zones and creeks follow these zones.

It is a certainty that the damage experienced to the swamps with the pumping under modification 5 will be experienced under modification 8. modifications will cause regional drawdown of near-surface groundwater, damaging Kangaroo and Lambs Creeks and swamps, as well as the upper Cocks River and its swamps. Nationally endangered plants may also be harmed, including *Xerochrysum palustre* (Swamp everlasting), *Pultenaea glabra*, *Kunzea cumbatensis*, *Veronica blakleyi*, *Grevillea acanthifolia*, *Gentianella cunninghamii*, *Prasophyllum australe* and Latham's Snipe (a rare migratory bird species).

I find it breathtaking that Centennial Coal has proposed discharge of mine water into Cocks River at a 350µS/cm standard at Wangcol Creek. The modifications defeat the purpose of the \$120 Springvale Water Treatment Project that was to eliminate mine water discharges from Springvale Mine and Angus Place colliery.

By adding saline mine water to the Western Coal Services area and then to Wangcol Creek, Centennial is pushing more mine water into a highly polluted area. The addition of mine water will push more pollution out of this reach of Wangcol Creek. It is a fundamental principle of environmental management to avoid addition of water into a polluted area. Approval of this proposed discharge at LDP001 is likely to flush out more heavy metals from that catchment downstream into the Cocks River, a key part of Sydney's water catchment and the Greater Blue Mountains World Heritage Area.

The Angus Place mine modification and Western Coal Services modification meet the definition of "large coal mining" developments that will have, or are likely to have, "a significant impact on a water resource" the proposed modifications should be controlled actions under s 24D of the EPBC Act. Proposal to discharge ten megalitres a day of polluted mine water is part of a large development, Angus Place West major project and is in itself a large coal mining development. It will damage a long reach of the Cocks River catchment by pushing more pollution out of Wangcol Creek catchment and so will cause a significant impact on a water resource. It is also an unwise proposal as it goes against good water management practices of keeping highly polluted areas as dry as possible.

The impacts on the Cocks River and the World Heritage Area must be considered. The proposed groundwater drawdown also alters the Sydney Water supply catchment and that too must be considered under the EPBC Act.

The lowering of near-surface groundwater aquifers through pumping under Angus Place modification 8 will damage nationally endangered plants and swamps. These impacts are certain to occur and they occurred with modification 5 Angus Place. These impacts must be assessed.

The modifications should be controlled actions under the EPBC Act due to likely damage to Sydney's water catchment, a World Heritage Area and nationally endangered plants.

Centennial Coal has a continuously poor track record of environmental management. This year the company mined outside its approved area at Airly Mine, a Class 1 reportable offence under NSW Environmental Planning and Assessment Act. Last year breached its development consent for Airly mine causing major irreversible fractures to million-year-old sandstone pagoda formations in the Murrumbidgee Murumbidgee State Conservation Area. In 2017, the EPA prosecuted Centennial after its coal waste storage at Clarence mine spilt 2330 tonnes of coal fines into the Wollangambe River and caused damage within the Blue Mountains World Heritage Area, and Centennial was fined over \$1 million and clean-up operations took 12 months.

The damage caused to nationally endangered swamps is legend. The company paid \$28 million in offsets and a \$1.45 million in an enforceable undertaking and if these modifications are approved the damage will continue. Legal censure and financial penalty does not stop the damage. Inaccurate predictions and non-compliance, environmental harm and damage, Centennial does not operate responsibly in the Gardens of Stone region. These modification proposals must be refused.

These modifications to the Angus Place and Western Coal Services projects should be withdrawn. Sydney's drinking water supplies must be protected. Centennial Coal should seek to install a reverse osmosis treatment plant at Angus Place Mine as part of the major project for Angus Place West. The brine from the reverse osmosis treatment plant should be pumped to the Springvale Water Treatment Plant site for processing and appropriate disposal.

Discharges from any future reverse osmosis treatment plant at Angus Place should have a salinity of 30µS/cm so as to have a neutral effect on the salinity of the unpolluted Cocks River headwaters.

It is bitterly disappointing that Centennial Coal has chosen to by-pass the \$120 million water treatment plant and to

further damage matters of national heritage. These modifications should be refused to retain the integrity of planning process for mining proposals in NSW.

Thank you for the opportunity (such as it is) to comment.

A handwritten signature in black ink, reading "K. Muir". The letters are cursive and fluid, with a period following the first name.