

Illawarra Coal

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Department of Planning
GPO Box 39
SYDNEY NSW 2001
Attn: Naomi Nelson

Dear Naomi

**Response to Submissions – O'Donnell
Appin Vent Shaft No 6 Project (00-0079)**

Thank you for providing the submission from the O'Donnell's in regard to the Appin Vent Shaft No 6 Project (00-0079). The Environmental Assessment was on public exhibition between 19 October 2010 and 18 November 2010. This exhibition period was broadly communicated to residents of Douglas Park by Illawarra Coal and advertised in the normal manner by the Department of Planning.

The O'Donnell submission was provided to Illawarra Coal on 11 January 2011. Illawarra Coal has considered the matters raised in the submission and our response is provided in Appendix A.

We look forward to Project Approval as soon as possible. If you have any queries please contact the undersigned.

Yours sincerely,



Bruce Blunden
Manager – Environmental Approvals

Appendix A

Illawarra Coal response to O'Donnell Submission

Proposed site access road

1. Illawarra Coal has undertaken considerable consultation with the Douglas Park community and the RTA/Wollondilly Shire Council to determine the most acceptable access route to the shaft site. Several alternative access routes to the site were investigated as shown in Figure 6.5 of the Environmental Assessment. The preferred access has been selected on the basis of support from the road regulatory agencies, safety and environmental considerations.

The proposed access road intersection with Menangle Road exceeds the RTA design requirements for such an intersection with the predicted volume of traffic expected to use both Menangle Road and the access to the site. The provision of dedicated turn in and turn out lanes for traffic entering the site will maximise safe entry to the site. As described in the Traffic Management Plan, a maximum of 136 vehicles per day may enter the site during the construction period. In general, the traffic volumes entering the site will be substantially less during most of the shaft construction period and during shaft operation.

The RTA does not object to the proposal intersection and access. Illawarra Coal has been liaising with the RTA and Wollondilly Shire Council (WdSC) to finalise the detailed design of the proposed Menangle Road intersection with the proposed access road in accordance with the requirement of the RTA's letter dated 15 October 2010. The detailed design of the proposed Menangle Road intersection and access road was provided to the RTA and WdSC on 26 November 2010.

2. The proposed intersection is entirely located within the existing road reserve as shown in Figure 1. All road construction for the Menangle Road intersection will occur within the road reserve. As discussed and agreed with Mrs O'Donnell on 26 November 2010, any disturbance to the boundary plantings and/or fence line that occurs as a result of the intersection construction will be minimised where it is possible to do so. Where physical impacts to the boundary plantings and/or fence line are unavoidable (within the road reserve), Illawarra Coal will replace the impacted items in consultation with the O'Donnell's.

All plantings are exotic and have negligible environmental value. Rehabilitation of the existing or similar vegetation along the road verge, in consultation with the O'Donnell's, will minimise visual amenity impacts.

3. The proposed access road for the Project will be constructed over a period of 4-6 months. The access road base once constructed will be promptly sealed to minimise noise and dust during the construction and operation of the shaft and related ancillary activities. Sealing of the access road will occur prior to commencement of shaft drilling operations. An air quality assessment was undertaken in the Environmental Assessment (see Appendix E). During access road construction, airborne dust will be controlled by standard construction methods such as water sprays. The Air Quality Impact Assessment concludes that *given the temporary nature of the access route construction and implementation of standard dust measures, dust impacts are expected to be minor.*
4. The proposed access road is consistent with the size and scale of existing local roads. The verge of the access road will be revegetated post construction to minimise visual, dust and water impacts.

All operational impacts of the proposed vent shaft are predicted to be negligible at the O'Donnell's premises given its distance to the facility. Some temporary impacts and inconvenience during the construction of the intersection and access road may occur, although these will be minimised by managing activities in accordance with Traffic Management Plan and standard construction management techniques. Negligible change in the flow of traffic on Menangle Road is predicted to occur as a result of the proposed access route. The Project, during both the construction and operational phases, will contribute to small increases in traffic volumes on Menangle Road.

Construction Hours

The construction of the access road and intersection will occur between the hours of 7am-6pm Monday to Friday and 8am – 1pm Saturday. Heavy vehicle movements to the shaft site during shaft construction will be planned during these restricted operational hours.

Construction of the shaft is required to be undertaken on a 24 hour, seven day per week basis. Light vehicle access to the shaft site will be required between 6pm-7am Monday to Friday, 1pm – 8am Saturday and Sundays to facilitate crew changes.

Operational Hours

Minimal light vehicle traffic will occur for routine inspection and maintenance activities of the proposed vent shaft. Any heavy vehicle access to the shaft facility will occur during daytime hours (7am-6pm Monday to Friday and 8am – 1pm Saturday) unless required for emergency purposes.

Delivery of material to the service boreholes is planned to occur during daytime hours (7am-6pm Monday to Friday and 8am – 1pm Saturday) unless required for emergency purposes. Traffic impacts that are predicted to occur during the operational phase of the projects are described in the Environmental Assessment.

Environmental Impacts

The proposed access road meets RTA design specifications and is consistent with local roads in the area. The access road will be sealed and the road verge revegetated to minimise visual, dust and water impacts.

No impact on tank water is expected to occur from the proposal. An air quality assessment was undertaken in the Environmental Assessment (see Appendix E). During access road construction, airborne dust will be controlled by standard construction methods such as water sprays. The Air Quality Impact Assessment concludes that *given the temporary nature of the access route construction and implementation of standard dust measures, dust impacts are expected to be minor*. The O'Donnell residence is several kilometres from the proposed vent shaft and no construction or operational air impacts are predicted to occur at their location.

Construction of the shaft will take place using the blind bore method. During drilling the shaft will be full of water to facilitate the construction process. Water treatment products such as flocculants may be used to assist with clarifying the water prior to any discharge. At the completion of the shaft drilling, the shaft will be lined to prevent the ingress of groundwater. No impact of the quality or flow of groundwater is expected to occur as described in Section 9.5 of the Environmental Assessment.

Heritage Impacts

Illawarra Coal has committed several actions in the revised Statement of Commitments dated 7 December 2010 that aim to monitor, maintain, conserve and adaptively reuse the heritage listed group of buildings in a manner consistent with their heritage status.

The Environmental Assessment included a Heritage Impact Assessment. In response to the submission from the Heritage Office, Illawarra Coal submitted a supplementary vibration assessment for the heritage buildings to the Department of Planning on 7 December 2010. This supplementary vibration assessment demonstrates that, during both construction and operation of the Project, the magnitude of ground and airborne vibrations that are predicted to occur from the proposal are significantly less than the relevant criteria for heritage and other sensitive structures.

Public Exhibition

Illawarra Coal has consulted widely within the Douglas Park community during the development of the Environmental Assessment and prior to and during the exhibition period for the No 6 Vent Shaft Project. This consultation has included:

- Formation and regular meetings with the Douglas Park Advisory Panel;
- Mail out of community updates specifically on the vent shaft project during April, June and October 2010. The October 2010 community update specifically alerted residence to the public exhibition period, where to view the Environmental Assessment and that submissions to the Department of Planning could be made;
- Doorknocks within Douglas Park;
- Provision of community update information at the notice board at Douglas Park;

- Community Information Day on Saturday 24 July where people were given an opportunity to view the proposed Vent Shaft location and also view an existing Vent Shaft
- Community Information Day on 6 November 2010 (during the public exhibition period) which was attended by Mr O'Donnell
- Douglas Park information spot twice monthly

