muswellbrook shire council

Enquiries
Please ask for Sharon Pope
Direct 02 6549 3868
Our reference
Your reference **SSD 10418**

4 February 2020

Team Leader
Energy and Resource Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Evans,

Mount Pleasant Optimisation Project (SSD 10418)
Request for Input into Secretary's Environmental Assessment Requirements

I refer to your email dated 6 January 2020, requesting Council's input to the Secretary's Environmental Assessment Requirements (SEARs) for the above project. Council thanks you for the opportunity to provide comments.

Based on the review of the applicant's Scoping Report, Council requests that the EIS assesses:

1. Traffic and the Local Road Network

1.1 A traffic impact assessment should be prepared in relation to the project. The Assessment should investigate the effect of additional traffic movements associated with the construction, operational and decommissioning phases of the project on the local and regional road network.

1.2 The Traffic Assessment should review and incorporate strategies and recommendations contained in the *Muswellbrook Mine Affected Roads Network Review* (Bitzios and Northrop; 2019). The Project will increase the life of the Mt Pleasant Mine by 22 years, will result in the extraction of an additional 250 million tonnes of ROM and effectively double the workforce, all during the time that the Bengalla, Mt Arthur and Mangoola Mines will also be increasing the life of their mines (and the Muswellbrook West Coal Mine Project will potentially seek approval), some also seeking approval to modifying the local road network. The cumulative impact will be:

- additional traffic movements on the road network for a longer period of time,
- an overall increase in vehicle kilometres travelled and increased CO2 emissions resulting from vehicles traveling to and from the site.

1.3 Council considers that Mt Pleasant Mine should make a commitment to constructing the Bengalla Link Rd to Wybong Road link recommended in the Road Network Map contained in the *Muswellbrook Mine Affected Roads Network Review*.

2. Dust and Air Quality

2.1 A cumulative air pollution analysis should be prepared to assess the total concentration of air pollutants from this Project, other mines, ash dams and coal-fired power stations, quarries and agriculture in the Region.

2.2 Air quality issues in the early morning hours are very visible for much of the year. Council is informed that this occurs as a result of a strong inversion that forms over the Muswellbrook and Singleton council areas, trapping dust and other pollutants.

2.3 This naturally occurring phenomenon seems to be well known by State Agencies. It is Council's view that the 24 hour averaging period for air pollution monitoring has the unintended consequence of obscuring issues of elevated dust levels in the late evenings and early morning hours for much of the year, resulting in unacceptable health impacts for local residents and the equine industry.

2.4 The EIS should explore all feasible, real-time air quality monitoring protocols that will address the inversion issue better than the 24 hour averaging protocol, controlling dust generating activity in the early evenings and mornings periods when necessary, but also reducing the down time the Mine experiences as a result of the 24 hour averaging protocol.

3. Visual Impacts

3.1 A detailed assessment of the likely visual impacts of the development (before, during and post-mining) on private landowners in the vicinity of the development and key vantage points in the public domain, including vehicles traveling along the New England Highway, Wybong Road and Kyuga Road.

3.2 Identification of mitigation measures to minimise visual impacts (including lighting) of the development.

4. Rehabilitation

4.1 Council has a keen interest in ensuring that the rehabilitation of mine sites is completed to high standards, in line with industry best practice and to support post mining land uses. The EIS should:

- Give consideration to the employment of micro-relief to the rehabilitation of the site, in line with the principles of Geofluv design, to ensure long-term site stability and erosion control, and to create a more natural looking landscape post development;
- Consider a design/mining sequence that will result in no final voids; and
- Provide a detailed description of the progressive rehabilitation measures that would be implemented over the life of the development and how this rehabilitation would be integrated with surrounding mines and land uses.

5. Biodiversity

5.1 Provide accurate predictions of any vegetation to be cleared on site;

5.2 Provide an assessment of the likely biodiversity impacts of the development, paying particular attention to threatened species, populations and ecological communities and groundwater dependent ecosystems, undertaken in accordance with the Biodiversity

Assessment Method and documented in a Biodiversity Development Assessment Report or, subject to agreement with OEH and the Department, undertaken in accordance with the Upper Hunter Strategic Assessment (UHSA);

5.3 Assess the likely impacts of the development on listed threatened species and communities under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (see Attachment 4);

5.4 Provide a strategy to offset any residual impacts of the development in accordance with the offset rules under the Biodiversity Offsets Scheme;

6. Water

6.1 Provide an assessment of the likely impacts of the development on the quantity and quality of existing surface water resources including a detailed assessment of proposed water discharge quantities and quality against receiving water quality and flow objectives;

6.2 Provide an assessment of the likely impacts of the development on groundwater resources,

6.3 Provide an assessment of the likely impacts of the development on aquifers, watercourses, riparian land, water-related infrastructure, and other water users, including cumulative impacts of water licences issued to the Project, other mines, and power stations that will permanently remove water from the catchment. Each mine says they hold sufficient water licences to cover "loss of water". But the loss is permanent, and if the water sharing regime needs to change in the broader catchment for societal, ecological, or climate change reasons, or to satisfy the requirements for emerging industries, the water loss due to mines will place limitations on the ability to change the water sharing regime.

7. Economic Opportunities

7.1 Council is interested in ensuring the local community is a beneficiary of reported economic and employment opportunities. Accordingly it is requested that the application considers measures that can be put in place to ensure that the project supports local jobs and businesses and results in opportunities for local people to gain skills in the construction, project management and various Trades. Apprenticeships for local young people would be welcomed.

8. Housing and Community function –

8.1 The Muswellbrook Chamber of Commerce and local Estate Agencies indicate that investors have a strong presence in the local housing market, buying into the market for the high rental returns that can be gained from shift working miners who drive in and out of the area based on shift working patterns, returning to their families in the Lower Hunter when "off". This is making it difficult for owner/occupiers to enter the market. The casualization of the mine workforce is also having impacts on the ability of some households to secure loans from financial institutions to purchase housing.

8.2 While Council has ensured there is sufficient zoned land for residential housing demand, having subdivisions and housing constructed is dependent on market forces and the initial costs of constructing infrastructure to enable subdivisions to occur.

8.3 A portion of the Castlerock community has connections with the Wybong community. Mining has reduced the population living in rural areas west of Muswellbrook. The

cumulative impact is evidenced in a reduction in community volunteering and participation on local sports teams.

8.4 The EIS should assess and make recommendations on steps that can be taken to reduce the impacts mining has on local communities, housing affordability and the ongoing vibrancy/economic sustainability of Muswellbrook and Denman in particular.

9. Consolidation of Approvals

9.1 The Mt Pleasant Mine site has been the subject of a number of applications and modifications. The EIS should provide details on how it is intended to consolidate these into a single approval, combine the rehabilitation requirements of the different approvals and surrender old approvals.

The above comments are not intended as an exhaustive list of assessment considerations or Council comments in relation to the project, but to guide the preparation of the studies required for the project.

Council appreciates the opportunity to comment and would be pleased to provide additional information if requested.

Yours faithfully

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