

David Mooney - Bulga Mining Complex - Bulga Open Cut Optimisation Project - Singleton Council Submission

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To: 'David Mooney' <David.Mooney@planning.nsw.gov.au>
Date: 14/06/2013 8:31 AM
Subject: Bulga Mining Complex - Bulga Open Cut Optimisation Project - Singleton Council Submission

Dear David,

Please find following a summary of the issues Singleton Council raises in respect of the proposed Bulga Open Cut Optimisation Project. As previously indicated a more comprehensive submission will follow once the Council has considered a report in respect of these issues in early July.

1. Air Quality

- While it is acknowledged the air quality impacts are consistent with the existing operations and best practices dust management measures are being implemented and proposed, the community remains concerned as to the impact of dust emissions on their health.
- The EA has not carried out a specific Health Impact Assessment - this would have been a community expectation.
- In relation to cumulative impact the EA concludes that there is a probability that 17 residences may exceed the EPA PM10 24 hour criterion on some days of the year when the cumulative impacts from all sources are considered.
- The timely rehabilitation of exposed areas is a community expectation. It is requested that particular attention be given to management of dust associated with the construction of the mitigation bund and if consent is granted rigorous conditions are imposed to mitigate impacts in this regard.

2. Noise Impact

- The proponent has acknowledged that noise is a key consideration in continuing the mining operation and has consequently designed a proposed Noise and Visual Bund. The timing and design of this bund is stated to deliver past Year 3 no noise exceeding the acquisition criteria. One non mined owned residence would be adversely impacted in this regard in Year 1 – 3. At Year 6 it is predicted that noise levels will reduce below those currently emitted from the existing operation. A raft of operational noise mitigation measures are also proposed and the Council notes the proponents ongoing commitment to this program.
- The environmental health impacts of noise emanating from mining operations is an ongoing issue of concern for the community. Council would request that health impacts be specifically addressed by the Department's assessment.

3. Blasting

- Emissions from blasting have been raised by the community as an issue of concern and particularly coloured plumes of smoke which have allegedly been observed on public roads.
- Council would be concerned to ensure that industry best practice Blast Management Plans are developed and implemented.

4. Biodiversity

- There will be impact on 734 hectares of woodland/forest vegetation including approximately 7.3 hectares of the Warkworth Sands ecological community.
- Approximately 6.6 hectares of the Warkworth Sand community has been identified as being of the bullock-dominant variant which is regarded as being of lesser ecological value.
- The EA states that approximately 0.8 hectares of the Warkworth Sands community is of higher quality.
- A Warkworth Sands Woodland Conservation Area is proposed as part of the Rehabilitation

and Offset Management Plan.

- An Ecological Impact Mitigation Strategy and Biodiversity Offset Strategy are proposed.
- Biodiversity offsets are proposed in the Reedy Valley somewhat removed from the immediate locality. While council understands the complexity of acquiring like for like offsets within the more immediate locality it is regrettable this has not been achieved.

5. Water Resources

- The final void will retain a significant volume of mine water over 100 plus years, which will effectively be non-potable polluted water. It is unclear how the final land form and management thereof will deal with this issue and ensure the future sustainability of the rehabilitated final land form.

6. Land Use and Agriculture

- The Project is largely contained within the existing mining operation area except for the areas where the Noise and Visual Bund are proposed and the relocation of the Broke Road.
- A vineyard and olive grove owned by the proponent will be impacted and is currently being relocated.
- Council acknowledges that the proponent has been negotiating with the affected Mushroom Composting business and is seeking a positive outcome for both parties.
- The likely end land use, as distinct from landform, will need to be determined and the Council would request further discussions with the proponent at an appropriate time in the future. The Council's objective is to facilitate sustainable final landforms and land uses which fit within a broader strategic context.

7. Transport

- It is proposed to realign Broke Road around the mine comprising approximately 9.3km of new road construction , adding an additional 1.9km of road between Broke Road and the Golden Highway.
- Charlton Road is proposed to be realigned for 4km around the Noise and Visual Bund to the west. This will result in an addition 400 metres of road.
- The consequential impact of travel times is predicted to be 1 minute and 12 seconds extra for Broke Road and 15 seconds extra in respect of Charlton Road.
- These realignments have potential residual impacts. In relation to Broke Road it is the relocation of the Mushroom Composting business and impact on the operation of the Singleton Military area. The Charlton Road realignment raises issue in relation to the remanent convict built Great North Road and Broke RAAF landing ground. It is acknowledged that the proponent recognises this impact and has committed to an Interpretation Plan for the remanent historical road.
- Any road reconstruction works will need to be in accordance with Singleton Councils construction standards and approved by the Council as the road authority.
- Council has requested the design of the proposed relocated Broke Road include provision for a cycle way.
- Management of driver fatigue and the use of short cuts by workers driving in and out of the locality is a recognised community concern and is acknowledged by the proponent who is working with existing employees, and will do so in the future to reduce these impacts. Opening of the Hunter Expressway should alleviate this issue to some extent.

8. European Heritage

- Potential impacts are in principally in relation to the remanent convict built Great North Road. The Visual and Noise Bund would ultimately cover the alignment of this road although the EA investigations do not reveal any physical evidence of the road remaining in situ this location. The proponent has committed to implementing an Interpretation Plan.

9. Cultural Heritage

- The EA recognises the Project will impact on 71 Aboriginal sites. A mitigation strategy is to be implemented in consultation with registered Aboriginal parties. Council requests the Department ensures local aboriginal interests are protected.

10. Visual Impact

- A Noise and Visual Bund is proposed to mitigate visual impact. The bund is proposed to be in place from Year 6 of operation onwards. In the intervening time the local community is likely to experience adverse visual impacts to varying degrees.

11. Social and Economic

- The economic impact evaluation (EIE) is carried out on the basis that the local area is defined as the immediate locality comprising the communities of Bulga, Broke and Mt Thorley, whilst the remaining Singleton Local Government Area is aggregated into the broader Hunter Regions. The EIE also considers impacts in relation to the State. While the most significant direct environmental concerns and possible detrimental impacts are mostly confined to the local area, as categorised in the EIE, there appears to be no consideration to the broader Singleton LGA where the broader cumulative impacts of mining occur. Council would request this analysis be undertaken and the economic impact quantified.
- The most significant economic benefits would flow to the State, then to the Region and a small identified local benefit.
- The EIE acknowledges that “the environmental and social impacts of the Project are primarily local in nature while the benefits are far more widely spread.”
- A Social Impact & Opportunities Assessment (SIOA) has been carried which describes a range of programs and strategies to mitigate the Project impacts.
- Council would request that in the absence of a successful negotiation prior to determination of the Project, and should consent be granted, that a suitable consent condition be imposed setting a framework to negotiate a Voluntary Planning Agreement which seeks to offset social and environmental impacts by developing a range of commitments from the proponent to implement appropriate programs and strategies within the immediate locality and the broader Singleton Council Local Government Area.
- The EA indicates the Projects construction workforce including multiplier affects is predicted to result in an estimated 27 new employees living in the Broke/Bulga area and 227 in the broader region. However in the SIOA the predicted construction workforce is 300. This will have an impact on and increase demand within the local housing residential accommodation market. The Council requests the proponent develops a strategy in consultation with Singleton Council to address this issue.
- There is not a predicted net increase in full time employees.

12. Waste Management

- Council would request the Department imposes a condition requiring the Proponent to develop a Waste Minimisation Strategy to reduce waste from the operation going to landfill.

Please contact the undersigned should you require any clarification in respect of the issues raised.

Regards

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