

Director – Resource Assessments
Planning Services
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

13 October 2016

Dear Sir,

ROCKY HILL COAL PROJECT – DEVELOPMENT APPLICATION SSD-5156

The Gloucester Environment Group (GEG) and its membership of 61 people, opposes the application by Gloucester Resources Ltd (GRL) for an open cut coal mine close to the township of Gloucester on the following grounds.

Location – The proposed main extraction area is located in an area designated by the former Gloucester Shire Council for Environmental Conservation and is close to residential properties, viz

- Within 900– 1800 m of the Forbesdale Estate, with 35 rural/residential properties
- 1.8 to 2.5 km from the Thunderbolts and Avon View residential estates
- 1.8 to 2.5 km from the Bucketts Way, with many rural/residential properties

Your government has passed legislation which does not allow coal seam gas wells or wind farms within 2 km of a residence. Buffer zones should be also be applied for coal mines except the minimum distance to residential areas should be at least 5 km due to the much greater potential impacts from noise, air quality and blasting. The development and certain extensions to follow, will sterilise any development of Gloucester to the east and south.

Water – GEG has a particular interest in the protection of local rivers including being actively involved in the restoration and regeneration of riparian ecosystems. The proposed mine site is located very close to the Avon River and covers part of its flood plain. The Avon River is part of the catchment area for the Manning River, which is the source of water for a large area of the mid North Coast, and should be protected at all cost. The river also has important riparian vegetation and aquatic ecosystems that need to be protected. The geology and therefore the hydrogeology of this area is very complicated and any mining will affect the water table and associated beneficial use aquifers. The “precautionary principal” must be invoked when assessing this application.

President :

Jeff Kite Tel: 6558 7436
Email : jeffkite24@gmail.com

Rivercare :

John Watts Tel: 6558 9769
Email : john-watts1@bigpond.com

Secretary :

Janine Phillips Tel: 6558 9766
Email : gloucester.environment.group@gmail.com

Treasurer :

Terry Hardwick Tel: 6558 8104
Email : terryhardwick@gmail.com

Noise – The EPA concerns about noise, as stated in their submission, are extremely alarming. It is also understood that no matter what the standards might say and how they might be met by the proponent, a very large number of people will have mine noise in the background whenever the mine is operating. This is totally unacceptable and should be enough to reject the project without even considering other issues.

Blasting has recently been a huge problem for the people of Broke which is near the Warkworth Mine. The impact of blasting is a critical issue and it has not been properly addressed by GRL. The effects of blasting will be felt by residents many kilometres from the site.

Air Quality- The effects of coal dust and blasting, especially on children's health, have been well documented in the Singleton area and a need for a radius of more than 5 kms is now well supported. There is no threshold below which particle pollution exposure is not harmful to health according to the World Health Organisation. The proposed mine is far too close to local primary schools, the high school, the hospital as well as residential areas.

Spontaneous combustion is also of great concern with this already being a major problem at the Stratford Mine and a huge and well publicised issue for a major brown coal mine in Gippsland.

Economics – Should the mine go ahead, GRL asserts that they will provide work for local people, but we suggest that whilst there may be a few unqualified positions, the majority of the workforce would be made up of personnel with previous experience / qualifications, who for the most part would be “drive in/drive out” workers. We believe that in many instances, where people move into an area to obtain employment at the mine, they will then be classified as “local”, which is patently not correct. There are local companies who have already indicated that if the mining goes ahead, they will relocate their operations, with the subsequent loss of employment.

Tourism – Tourism currently accounts for an income of around \$50 million per annum to the area. This will be hugely reduced if Gloucester were to become a mining town, as opposed to a town with a distant existing mine (Stratford).

Expansion – Historically once mines have been approved, they seek expansion at some stage. We feel that this poses a massive threat to the township of Gloucester and especially to the people living to the south and east of the CBD.

Flora and Fauna - The mine poses a threat to local threatened flora and fauna, such as the grey-crowned babbler, squirrel gliders, and possibly the brush-tailed phascogale. GEG has had an ongoing involvement with the conservation of the grey-crowned babbler.

We believe that the proposal to use McKinleys Lane as the main access to the mine will destroy the babbler family that presently live there. What is likely to also happen is that the mine will form a wedge between the babbler families in Tiedmans Lane, the Cemetery and the north end of Waukivory Lane. Babblers need to keep their gene pool fresh and do this by forcing the young females to leave the family unit and fly off to another family unit. The coal mine pit will form a barrier to this, with its associated noise, dust, lighting, and diesel motor exhaust fumes. The dust and other particulates are also likely to pollute foraging areas.

Any idea of an off-set area is out of the question. Areas suitable for babblers in the valley are already occupied by babblers. You can't translocate one family onto another family. Our local babbler groups have already been seriously affected and reduced by land clearance, over-grazing, introduction of "improved pasture", cats and foxes, industrialisation and urbanisation, which is why they are listed as vulnerable in the NSW list of Threatened and Endangered Birds 2012 and the list of Australian & Territories Threatened and Endangered Species 2016. The constant whittling away of native open woodland is endemic throughout Australia and already having a massive impact on birds like the babbler.

The area is currently predominately a farming area, with many people having moved here to enjoy the peaceful environment and lifestyle and is a major tourism centre. It should be allowed to remain so.

The Gloucester Environment Group also endorses the submissions made by the MidCoast Council, Groundswell Gloucester, and the Environment Protection Authority. We call upon you to reject this application.

Yours faithfully,

Jeff Kite
President