



# Public Submission by Hunter Valley Gliding Club Co-operative Ltd

## HVO North Open Cut Coal Continuation Project—Environmental Impact Statement

### Who we are and our interest in the Project

The Hunter Valley Gliding Club Cooperative Limited (the “HVGC”) is non-profit gliding club with 75 members. HVGC owns the Warkworth airfield and has operated there for 50+ years.

The airfield is adjacent to HVO South mining area and is surrounded by land held by HVO or other mining companies.

HVGC conducts flying operations on all weekends and public holidays with mid-week flying frequent in summer, the best soaring weather, and occurs occasionally at other times. Members are also present midweek to carry out maintenance on gliders and facilities.

There are accommodation facilities on the airfield and overnight stays, particularly on weekends are frequent.

### HVGC has existing Agreement with HVO

Schedule 3, condition 47 of the existing HVO South Project Approval required that HVO maintains an agreement with the HVGC to address the potential impact of the mine on the use and operation of the HVGC’s facilities. Further Condition 49 required the development of an amenity management plan for HVGC’s.

The agreement—the *Concessions and Mitigation Agreement* (the “CMA”) and associated *Amenities Management Plan* (the “AMP”) have been in place since 2014.

The CMA and AMP have worked well and benefited both HVO and HVGC

Regarding the CMA and AMP, the EIS states:

*This agreement is in place, as well as the amenity management plan, which will both be updated to reflect the project.” (EIS Section 2.6)*

HVGC notes that the negotiation and development of the CMA and AMP were conditions precedent for the current HVO South approval.

The CMA and AMP broadly cease with the expiration of the current approval in 2030, or earlier only if “permitted mining” under the approval ceases.

HVGC requests that a similar condition for a CMA and AMP be part of the Project approval and that it be renegotiated to reflect the changes to the original approval that are the subject of the EIS.

The new agreements should reflect HVGC’s decade of operational experience under the existing approval as detailed below.

## Operational Experience of the CMA and AMP

HVGC is broadly comfortable with the CMA and AMP but notes, with the benefit of hindsight, several outcomes that have greater impact than envisaged at the time the CMA was negotiated:

- Dust, particularly coal dust has been more pervasive and its abrasive and corrosive nature has had some adverse effects on gliders, aircraft, and facilities
- Turbulence on take-off and approach to the runway has increased, particularly at the western end of the strip. This appears to be due to a combination of the spoil mound to the west of the strip and re-afforested areas that now have mature trees in areas that were historically bare grazing land. We note that the spoil mound contours conform to the Obstacle Limitation Surface (the “OLS”) for airfields.
- Being surrounded on almost all sides by open cut coal mines does create some operational limitations. From the west and north, there is no safe place to land for approximately 10 kilometres so gliders returning from cross country flights must have adequate height to arrive at the airfield safely or they must land away from the airfield. This isn’t a safety issue, just that there are some days and conditions where extended flights are not possible.

The cumulative impacts of successive coal mine approvals and extensions has materially increased the impact on HVGC over the period of our operation, which predates coal mining in the immediate area. These increases over time have affected and will continue to affect our ability to attract and retain members as well as the experience and enjoyment of members and visitors when at HVGC due to the visual, noise and dust impacts from mining operations.

## Our Comments on the EIS

Our comments fall in three areas:

- The Lemington Road realignment
- The length of the additional period of mining
- The likely impact of dust, noise, and blasting; and
- The definition of “sensitive receptors”

We also note several minor corrections to the EIS.

### [The Lemington Road Realignment](#)

Comleroi Road provides access to the HVGC and the HVO South operations. It is an unmarked, sealed two-way, two-lane road, approximately 7-8 metres across with approximately 3.5 metres travel lands in each direction.

While the increase is not shown explicitly in the traffic data in the EIS, the realignment will materially and significantly increase traffic on Comleroi Road, perhaps in the order of 50%. During peak traffic flows such as shift change in adjacent mines, queues of traffic will be expected to form from the intersection with the Golden Highway.

While there will be some loss of amenity because of increased noise, the most concerning impact is on safety.

The driveway to the HVGC facilities and Warkworth Airfield is relatively narrow and visually unobtrusive. It requires vehicles to all but stop in the travel lane before turning. This is especially so for club members’ vehicles towing glider trailers which are typically nine metres in length.

Appropriate traffic management measures will be required to avoid creating a hazard as other drivers have limited visual cues that there is an exit and vehicles may be slowing and stopping.

It was not apparent whether the EIS has modelled the noise impacts of increased traffic along Comleroi Road, particularly during peak periods which may be between 4am – 8am and 4pm – 8pm. HVGC would like to understand the noise levels expected from the expected traffic changes.

### [The Additional Period](#)

Prior to the EIS being released, HVGC’s reasonable expectation was that mining would cease in 2030 and from that period onward the material adverse impacts would cease, and we would return to a gliding facility set in a largely rural setting.

The long extension of mining coupled with the operational limitations does lessen the attractiveness of the facility to attract and retain members.

### [The impact of dust, noise, and blasting](#)

Our understanding, based on the information in the EIS and discussions with HVO is that the difference in the adverse impacts of dust, noise and blasting on the HVGC are unlikely to be reduced materially from the currently permitted levels under the existing approval.

This arises because the changes proposed for the HVO South operation, directly adjacent to the airfield are less in scope and magnitude than those proposed for the HVO North operation.

This must be seen in context that as noted above the impacts will continue for a further 15 years beyond 2030 and that coal dust particularly has had greater adverse effects than envisaged.

#### The Definition of Sensitive Receptors

The EIS (page 208) states:

*“Several other receptors for air quality are also shown as experiencing exceedances of VLAMP criteria including HVGC. However these receptors are not residences and are not regularly occupied and therefore are not considered sensitive receptors.”*

HVGC is of the opinion that the definition of sensitive receptors based on regular occupation incorrectly creates an impression that exceedance of VLAMP criteria is not a significant issue for the Club and its members. We request that the actual impact that the dust creates for our gliders, aircraft and facilities should be considered in this definition and that the HVGC should be classified as a sensitive receptor.

#### Minor Matters

The EIS (Table 20.2) refers to the HVGC as a “private, commercial glider operation”. This is misleading as the HVGC is a registered co-operative non-profit community sporting organisation which serves only its membership and the Hunter Valley sporting aviation community.

The EIS (for example Section 19.3.1 vii) states that there are no private properties on Comleroi Road. Appendix R – Traffic and Transport Impact Assessment (Section 4.4) repeats the error.

Yours Sincerely,

Ben Coleman

President

Hunter Valley Gliding Club