



Hunter Valley Gliding Club Co-operative Limited

10 March 2017

Attention: Director – Resource Assessments
Planning Services
The Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Madam or Sir,

Re: HVO South – Modification 5 – Progression of Mining

The Hunter Valley Gliding Club Cooperative Limited submits this response to the HVO South Modification 5 application environmental assessment.

The Hunter Valley Gliding Club Cooperative (HVGC) has owned a 26.24 hectare property adjacent to the proposed development since the mid 1960's, and has operated at the site as a gliding club for the benefit of its members and the gliding community since then. It has no employees and relies on the voluntary efforts of its 70 (approx) members to sustain the operation. The HVGC operates every weekend and most public holidays, and hosts one or two 7-10 day regattas per year. Many members visit for the weekend or for the regattas and stay on-site in caravans, tents or bunk rooms. Approximately 30 gliders are based at the site.

HVGC received a briefing on the proposed modification recently however the extent of the changes, the additional noise and dust modelling, increased height of final landform and increased production levels were not made clear at that time.

HVGC currently has agreement with HVO which sets out limits and management strategies for noise and dust. Therefore this submission will only comment on areas where there is a significant variance in the impact to HVGC from the previously agreed position.

Frequency of Use

Section 3.1.5 of the main report contains the statement:

The Hunter Valley Gliding Club (HVGC) is adjacent to South Lemington Pit 2 and operates infrequently as a single grass airstrip.

In fact, HVGC operates every weekend plus one Friday per month, two full weeks during spring and summer and occasional midweek days during spring and summer. In addition the runway is used, sometimes several times per week, by light powered aircraft which use the airstrip as a navigational waypoint and landing strip for training purposes. HVGC disagree with the categorisation of this use as "infrequent".



Cumulative Impact

Section 3.2.5 contains the statement:

In summary, it is considered that, should both projects be approved, the potential for cumulative impacts to result for the interaction of the proposed modification with the United Wambo Project is minimal.

HVGC is positioned between and adjacent to these projects. From our perspective the cumulative impacts from these two projects will be substantial and therefore we disagree with his statement.

Air Quality

It appears that dust modelling has been revised for this modification. Previous environmental assessments by HVO have recognised HVGC as a sensitive receptor. However none of the tables or figures in this modification list HVGC as a receptor, including figs 6.1 and 6.4 and the list in Appendix C. As a result we cannot assess the impacts on our club and members of this modification.

The modification contains the following statement in Appendix F, section 6.1:

In summary:

- the proposed modification satisfies the Mining SEPP non-discretionary standards for private dwellings not already entitled to acquisition from neighbouring mine operations; and,
- under the VLAMP, no additional private dwellings are impacted that are not already afforded acquisition rights from neighbouring mine operations as the VLAMP significant impact criteria corresponds with the Mining SEPP (clause 12AB(4)) non-discretionary standard with respect to cumulative air quality at private dwellings.

HVGC has not been afforded acquisition rights by any mining operation. Therefore we disagree with the above statement.

Appendix F, section 11 contains the statement:

The results indicate that the proposed modification would lead to an increase in dust levels relative to the current approved operations, however the resulting dust levels at all privately-owned assessment locations would remain within acceptable criteria with the exception of three assessment locations which are within the existing acquisition zone for other mine operations. The proposed modification satisfies the Mining SEPP non-discretionary standards with respect to cumulative air quality at private dwellings not already entitled to acquisition from neighbouring mine operations.

As above, HVGC has not been afforded acquisition rights and therefore disagrees with this statement.

Appendix F contains additional modelling of PM_{2.5} dust impacts from the proposed modification. As HVGC has not been modelled as a receptor it is not possible to accurately assess modelled dust levels at the property however the figures indicate significant impact. Appendix F, section 9.5 contains details of the likely health impacts of PM_{2.5} dust. HVGC is extremely concerned about the potential health impact to its members.

We believe that modelling results for HVGC as a sensitive receptor (as recognised in Section 3.1.5) need to be provided to be able to accurately assess health impacts to our members and allow informed decisions about mitigation and management of the impact.



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Noise

HVGC has not been modelled as a receptor in this modification. As a result predicted noise levels at the property are not listed in figures and tables and therefore impacts are not able to be accurately assessed. HVGC believe that noise modelling with HVGC as a sensitive receptor needs to be carried out and the results included in the modification EA in order for the impacts at the property to be considered.

It is expected that as a result of the South Lemington Pit 2 depth being increased that the duration of mining in close proximity to HVGC will be extended, thereby increasing the impact to the club and its members compared to the existing consent.

Landform

It is noted that the maximum height of the proposed landform is significantly increased compared to the existing consent. HVGC should be consulted over the impacts to aviation of the proposed landform to ensure it does not encroach the Obstacle Limitation Surface in our current agreement and that aviation hazards are clearly marked (for example communication antennae on the crest of dumps or rehabilitated areas).

HVGC's current agreement with HVO includes the condition that waste material from other areas is not imported to South Lemington Pit 2. HVGC expects this to be maintained although it is not mentioned in the EA.

Visual Amenity

Visual impacts to HVGC do not appear to have been considered in the EA.

Access

The details of access to South Lemington Pit 2 are not clear in the EA. HVGC expects that pit access design will consider access, power and services to HVGC in accordance with our current agreement and that mine access roads will consider the agreed Obstacle Limitation Surface.

Regards,

A handwritten signature in black ink, appearing to read "Ben Coleman".

Ben Coleman

President

Hunter Valley Gliding Club