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NSW Department of Planning and Infrastructure
GPO Box 39
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20 April 2012

Dear Sir,

Re: Turrawonga Coal Submission - Environmental Assessment

I refer to the aforementioned matter and make particular reference to Turrawonga Coal's correspondence dated the 17 January 2012 with respect to seeking submissions on the proposal for the mine expansion at its operations 15km to the North East of Boggabri.

Firstly, Council apologies for its tardiness in response to forwarding its submission to the Department for consideration and further will seek within this document to briefly further expand on the matters or issues raised within Council's email to the Department on the 5th March 2012.

Council understands that Turrawonga Coal (the proponent) seeks consent under 11_047 with the intent to;

- Continue the current mining regime of the Maules Creek Formation increasing from 2 million tonnes per year to 3 million tonnes per year and further expanding the mine life of 17 years. It is expected that the mine over its life will generate 50.5 Million tonnes of Coal.
- Provide ongoing explorative activities in search of further coal commodities;
- Construction of local mining roads including haul routes;
- Upgrade existing infrastructure facilities for the loading of coal commodity;
- Coal crushing and screening of up to 150,000 tonnes of coal for domestic customers;
- Crushing and screening of up to 90,000 tonnes of overburden to be used as gravel for local domestic customers.
- Re-alignment of the Goonbri Creek

Council is generally supportive of development of the mine and the economic multipliers that are subsequently generated through the capital investment and employment opportunities that the mine represents within Narrabri Shire Local Government Area. It is expected that the mine expansion will create an expected \$790 million to the New South Wales and regional economy along with employment opportunities of up to 120 people. It is noted that indirect financial benefit to local subsidiary industries will also flow as a result of the proposed expansion, supporting regional and some local business.

Council is concerned however with a number of matters raised within the Environmental Assessment of the proposal;

1. Population statistics and projections regarding workforce increases.

The report in S 4-115 Vol 1, uses 2006 Census figures to predict a declining population across NSC and GSC, but indicates a projected population increase by 2012 of 2068 in this area, 2/3 of which are estimated to be within Narrabri Shire.

It continues on p4-117 to indicate that there is 'considerable stock' of short term and rental accommodation in the 2 Shires and further states that the projected 85 accommodation units needed to house projected workforce increase for Tarrawonga is 'insignificant'. Within Narrabri Shire there is currently housing and accommodation pressures which is increasing demand upon already depleted stocks and reducing housing supply. Further there has already been a significant spike in housing and land process within the region due to demand pressures which has in turn affected housing affordability. Accordingly, Council seeks advice from the proponent how they intend to accommodate their workforce and secondly how they propose to not contribute to rising demands in housing supply and further increase housing affordability within the Local Government Area.

In the same assessment of education needs, the issue of lack of childcare places has not been addressed. On the following page, the proposed mitigation measures by Tarrawonga to address social issues makes no mention of training local people, only of employing local people who have appropriate skills. 80% of the increased workforce will be sourced outside the region. Given this is open cut mining and skills are easily transferred, this approach is considered to be insufficient.

In the area of projected economic benefit to the region and nation, there is no foreseeable direct benefit for Narrabri Shire Local Government Area businesses. All the specific examples given of contractors who will gain more work are Gunnedah Shire based or from within the greater region. Greater emphasis needs to be made on local subsidiary industries. (p3-11)

As Whitehaven has a greater focus on Gunnedah, despite the mine being located wholly within Narrabri Shire, there needs to be an indication of how Tarrawonga will enable more economic benefit to flow into Narrabri Shire. Once the mine transports coal to the Boggabri Mine railhead, all operations will definitely be within Narrabri Shire. Council would request that the proponent provide an assessment of its current expenditure regimes and further whether local goods, services and labour can be sourced locally for the benefit of the Narrabri Shire LGA.

2. Goonbri Creek Diversion.

The assessment provides for a 'low permeability barrier' and subsequently diversion of Goonbri Creek and a flood bund to prevent flooding of the mine void. None of this is acceptable without an extensive assessment of the impact on the alluvial groundwater flows into Barbers Lagoon and subsequently the Boggabri town water supply. There is no indication of the impacts of turning flood water from the Creek away from the void to the east and what this may do to the local floodplain. Council requests that further hydrological studies be carried by the proponent to establish the effect on ground water that such a diversion will cause.

The report also indicates the head of groundwater will decrease whilst saying there will be no appreciable change in the water table for local bores. Local residents are very concerned about a diversion of Goonbri Creek since much of the water flows underground in drier times. What will happen to that flow if the above ground creek bed is diverted?

Council calls for the Department to require an exhaustive analysis of the impacts of the proposed diversion. Further, the proponent should be required to undertake extensive flood modeling to establish exactly the impact of the proposed diversion will cause on flooding behavior, floodplain storage and whether there will be any adverse impacts to the natural and human environment.

Secondly, the proposed regional groundwater monitoring across the 3 Leards Forest mines should be by an appropriate independent body or State Government at the least, with regular public reporting. Such independent assessments will enable transparency, probity and will enable an unbiased and an appropriately qualified scientific analysis.

3. Goonbri Rd Relocation.

The Assessment talks of cumulative impacts and the 2 other local mines, viz Boggabri and Maules Creek.

There is no indication of how the proposed road diversion will affect the route of the Leards Forest Rd redirection which is to utilise Goonbri Road to access the Manilla Rd and further assessment needs to be carried out by the proponent on what the likely cumulative impacts will be.

Furthermore, the relocated road is stated as gravel, not sealed, but also refers to large numbers of construction traffic utilising the diverted road for the extension construction.(p2-19) Council requests that the diverted road and any access roads to the extension area be sealed to reduce dust issues and improve traffic safety during the construction phase.

4. Worker shifts and Safety

The extension provides for 2 x 12 hour shifts daily which raises the issue of fatigued workers travelling on local roads. There is no addressing of this issue which ought at least to be bussing of staff to site. The proponent should provide additional information on how the workforce will be transported to and from the mine site to their place of residence.

There is also no addressing of the accommodation for extra staff if they cannot be housed in rental accommodation and need to be in a 'mining village', if they are fly-in fly-out and whether the company will discourage the practice of 'hot-bedding' for the latter situation if utilised.

5. Waste Management.

The company proposes to bury used mine equipment tyres in voids. However, this is a recyclable product sought after by manufacturers of rubber based products. The matter of recycling of the tyres should be addressed, since water leaching into the filled void could be impacted by flowing through buried waste. It is also noted that such voids will not be appropriately capped and therefore represents a likely threat to the environment from toxins and leachate materials.

6. Trains

On page 2-23, the report says there will be no change to existing Whitehaven CCHP rail movements for the project despite a doubling in output.

It is not clear whether this implies longer trains to accommodate the increase, which would have some impact on wait times at level crossings at Gunnedah, Werris Creek and Scone and further down the line to the port of Newcastle. If additional trains are to be used to transport the commodity, this should not be at the expense of passenger rail, general freight and also agricultural commodity shipping.

7. Noise management

Page ES-11 discusses air quality and blasting. The monitoring for noise and air quality on a regional basis to cover all 3 mines near the Leards Forest must have a management plan which ensures sequential blasting, ie no 2 mines can blast at the same time. Greater emphasis needs to be placed upon a regional strategic management plan for cumulative impacts of the mines within the area rather than individual environmental assessment of each mine.

8. Surrounding Agricultural and Pastoral production.

There should be an indication of how the company will enable buffer agricultural and pastoral lands to continue to be productive and be properly managed to minimise weeds and related vermin. The company has purchased quite a number of properties within noise and air quality affected areas, however such lands should remain as productive agricultural entities via lease to adjacent farming properties.

9. Gravel use.

The mention on p ES-5 is not specific in terms of the production of gravel, and since discussions by Council with the company indicates they wish to provide gravel as their VPA commitment, it is important there is some further expansion on this issue. Crushing and cartage of the gravel could make this option unviable. Gravel supplies or overburden could represent an opportunity for the company to dispose of waste overburden whilst also allowing the repair and also re-sheeting of local roads within the area. The proponent will need to provide further information on exactly how they envisage that such a proposal will operate.

10. VPA

Council understands that there is a draft Voluntary Planning Agreement (VPA) that has been tabled by Council to the company to ensure that funds are available to off set some of the direct impacts relating to the mining activity. The bulk of the contributions requested will be utilized towards community infrastructure and also local roads and community facilities. Council requests that the proponent endorse the agreement prior to the issue of approval for the project.

11. Dwelling Entitlements on properties.

The Council is concerned that the removal of dwelling houses from farming properties will remove dwelling entitlements from undersized allotments and further remove 'existing use rights' of dwellings already approved on what could be classed as concessional allotments. This in the future as the mine is rehabilitated and farming land re-instated will reduce the housing stock available on the land for farming practices. It is Council's opinion that a number of houses upon under sized allotments have already been removed with the consent of Council for the provision of mine infrastructure and to accommodate the mine void.

Council requests that the Department ensure that these matters are addressed by the proponent at its earliest convenience. Council thanks the Department for the opportunity to comment on the proposal.

Should you require any further information please do not hesitate to contact myself within Planning and Development Services of Council.

Yours faithfully,

Mr Nick Wilton

MANAGER PLANNING AND DEVELOPMENT SERVICES