

4 July 2019

NSW Department of Planning and Environment
Major Projects Team
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Subject: SSD-59-Mod-5
Modification 5 Mannering Coal (MOD 5)
LAKE MACQUARIE NSW

Lake Macquarie City Council provides the following correspondence in response to the Department of Planning's request for advice (dated 17 June 2019) in relation to the above application.

Council officers have prepared this submission on behalf of Council. The concerns expressed in the attached Schedule are therefore the collective views of Council officers

Summary of Proposal

Delta Coal is seeking to modify the existing major project approval (MP06_0311) under Section 4.55 (2) of the NSW Environmental Planning and Assessment Act 1979 primarily to enable:

- an increase in the rate of ROM coal handling at, and transport via overland conveyor from, Mannering Colliery (MC) up to the approved extraction limit at Chain Valley Colliery (CVC);
- an extension of the project approval period from 30 June 2022 to 31 December 2027 (consistent with Schedule 2 Condition 5 of SSD-5465); and
- an alternative approach to mine design.

Recommendations

Council supports the increase in ROM coal handling and transport via conveyor as described in the proposal.

Council has no objection to the alternative approach to mine design.

The Environmental Risk Rating should be amended to also include the absolute risk rating, not just the incremental risk rating, in order to determine whether the risk category has been exceeded due to the additional increment.

Air Quality

Council seeks clarity on Table 8.5, which predicts an increase in the 24-hour average PM₁₀ concentrations, but no increase in the “project plus background” value. It is noted that both the existing and proposed values appear to exceed the “Assessment criteria” figure.

It is noted the statement predicts increases in annual TSP, PM₁₀, PM_{2.5} and dust deposition as a result of the proposal, however these are expected to remain below the relevant threshold levels.

Greenhouse Gas Emissions Reduction Targets

Lake Macquarie City Council's adopted Environmental Sustainability Action Plan 2014-2023 includes a city-wide target of 3% per annum reduction in greenhouse gas emissions. Council requests the assessment consider how the proposal contributes to this reduction target.

Impacts of Climate Change

Extraction and use of coal has been found to significantly affect climate and biodiversity (<https://www.ipcc.ch/sr15/>). Council requests that consideration is given to the project's contribution to the impact on flora and fauna as a result of climate change caused by the broader coal and coal power industries, and where this proposal may fit within a plan to limit the impacts of anthropogenic climate change. Specifically, it is recommended that contributory industries, such as coal mining, are required to participate in carbon offset schemes.

The use of locally-sourced coal for supply to Vales Point power station is supported in lieu of importing coal longer distances. To this extent, Council has no objection to the extension of the life of the mine subject to mitigation of the impact of the extended life as described above.

Other considerations

The following elements were considered by Council and were not deemed to have any additional impact to Lake Macquarie City, its residents or environment:

- Aboriginal and European Heritage
- Noise
- Integrated Planning
- Lake Macquarie Local Environment Plan
- Lake Macquarie Development Control Plan

The department is requested to consider these recommendations in the assessment of the proposed modification.

Should you require further information, please contact the undersigned on 4921 0025 or by e-mail on gkeech@lakemac.nsw.gov.au.

Yours faithfully

A handwritten signature in black ink, appearing to read 'G. Keech', written in a cursive style.

Geoffrey Keech
Development Planner
Development Assessment and Certification