

## *“Reclaiming our Valley”*

Hunter Communities Network

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Major Project Development  
Department of Planning  
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Sydney NSW 2001

Friday 22 May 2015

### **Submission of Objection Moolarben Coal Complex OC4 South-West Modification**

The Hunter Communities Network (HCN) is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

#### **Introduction**

HCN objects to the proposed modification of Moolarben Stage 2 as assessed. The modelling undertaken to assess the noise and air quality impacts appears to be based on limited input scenarios.

Neighbouring landholders are experiencing sleep disturbance, stress and health impacts from current operations at the Moolarben Mine Complex combined with impacts from the neighbouring Ulan Mine. This is demonstrated through the large number of complaints received in relation to noise pollution.

The commencement of mining in Open Cut 2 (OC2) has caused a great deal of additional disturbance to neighbouring landholders in the Cooks Gap area. HCN considers that the proposal to construct the south west haul road across the ridgeline between OC1 and OC4 will cause a greater increase in noise disturbance than identified in the noise assessment report.

#### **Low Frequency Noise**

Low Frequency Noise (LFN) is a major health issue for communities near large open cut coal mines. HCN considers that the level of LFN produced by the Moolarben Coal Complex has not been adequately considered in the noise model.

The assessment of LFN was based on monitoring for only one week in August 2014 (p 20 SLR Noise Assessment Report). The assessment concluded that a mean difference of 13.3 dBA at one property (No 175) over a one week period demonstrates that the Moolarben Coal Complex noise emissions do not contain “dominant low frequency content”.

The comments in response to noise complaints as reported in the 2013-2014 Annual Environmental Management Report(AEMR) have repeated reference to a 'constant low pitched hum' from the mine or 'faintly audible mine rumble' or 'general mine drone'. These are descriptions of LFN. There are at least 90 references to this type of noise emission in the Community Complaints Appendix in the AEMR across the year.

The investigation and follow up description after 'MPEA attended' complaints makes no reference to the monitoring or measurement of LFN when describing the mining hum.

There are references to LFN emissions from both the Moolarben Coal Complex and from the Ulan Mine. The cumulative impact of LFN is not discussed in the SLR noise assessment report.

HCN considers that more rigorous monitoring and assessment of LFN emissions from all three mines in the Ulan/Wollar area is essential to gain a better understanding of the cumulative impact on the community.

The health impacts from LFN are known to be extensive. It is irresponsible for the mining industry and Government agencies to ignore this health risk.

HCN believes that noise emissions from the Moolarben Coal Complex do have dominant low frequency content and therefore the LFN modifying adjustment factor should be included in the modelling for noise impacts at neighbouring properties.

HCN objects very strongly to the Broner report on LFN assessment criteria because it ignores the health impacts of LFN at the higher proposed levels of difference between A and C weighted noise levels.

### **Real-time Response Protocols and Reactive Dust Mitigation Measures**

The conclusion in both the noise assessment and air quality assessment reports that the OC4 south west modification will not exceed the currently approved environmental performance limits due to the implementation of management measures that cause operations to cease is a high risk outcome for community health and amenity.

These management measures are general triggered by complaints, particularly the Real-time Response Protocols for noise management. This generally means that neighbours have already suffered sleep disturbance before the complaint is made.

The lives of families and the farming community neighbouring the Moolarben Coal Complex have been severely damaged by this operation. It should be clearly recognized that the use of a haul road over a ridgeline will cause increased noise and dust levels. The cost of this should not be shifted onto nearby community members.

It should not be the responsibility of the community to have to continually complain about the loss of amenity and health due to mining operations.

### **Fair compensation for affected landholders**

HCN advocates that all landholders wishing to leave the district because of cumulative mine impacts and loss of property value should be offered compensation in the form of full replacement value of the property, house and infrastructure, water supply and amenity.

Yours sincerely

A handwritten signature in cursive script that reads "B. Smiles".

Bev Smiles  
On behalf of HCN