

18 April 2014

Dear Sir/Madam,

Submission of Objection – Proposed Longwalls 51 & 52 West Wallsend Colliery

The Nature Conservation Council of New South Wales (NCC) welcomes the opportunity to comment on the proposed Longwalls 51 & 52 West Wallsend Colliery project.

NCC is the peak environment body for New South Wales, representing over 120 organisations across the state. We have long-standing experience in state environmental assessment and planning. NCC strongly objects to the development.

NCC objects to this proposal on the following grounds

Subsidence

Longwall coal mining and the risk of subsidence is causing serious damage to the Sugarloaf State Conservation Area. Subsidence impacts are difficult to predict, and previous subsidence and botched remediation efforts have resulted in cement grout severely damaging a creek bed and surrounding area in Sugarloaf State Conservation Area.

Subsidence impacts will likely occur as a result of this new project, as noted in the Environmental Assessment. Subsidence has, and with additional mining will continue to, damage key natural and heritage features of Sugarloaf State Conservation Area such as land surfaces, cliffs, rock features, water resources, biodiversity and heritage. There are already several large chasms in the park due to previous mining.

Ecology

There have been seven threatened fauna species recorded within the Project Area: six mammal species and one bird species. Additionally, two threatened flora species were recorded within the project area, both of which are listed as vulnerable under the NSW Threatened Species Conservation Act and Commonwealth Environment Protection and Biodiversity Conservation Act. The ecological assessment found that the project would have a negative impact on the ecological values at Sugarloaf State Conservation Area.

Aboriginal Cultural Heritage

There have been two Aboriginal sites identified above the proposed mining area, and two grinding groove sites located east to the mining area. Subsidence in these Aboriginal areas has been identified as a risk. An isolated find is also located on an access track that has been identified as possibly needing subsidence remediation works.

Subsidence impacts are likely unavoidable with the development of Longwalls 51 & 52. This popular conservation area has already been badly damaged by mining and the consequential subsidence impacts. Risk of further damage is unjustifiable and we urge the department to reject this proposal.

Sincerely,



Katherine Smolski
Campaigns Director