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Rebecca Newman - Submission Details for cathy burgess (comments)

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Disclosable Political Donation: no

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Content:
I OBJECT TO THE PROPOSED 4TH COAL LOADER ON KOORAGAN IS
My first serious concern is that the submission period is the same as the 4th coal loader proposal on Kooragang Is, this is so unfair on the community. How can we properly do submissions on both these extremely important issues. I know of a number of people/groups that have had to choose one or the other.
The most disturbing part of this plan is that it has failed to protect any area of the Hunter Region from future mining and gas development.
I also have concerns with the fact that this & the 4th coal loader EIS actually contradict each other. I have found 2 of these but considering the 4th coal loader EIS is 4,500 pages I suspect there are others.
* On page 11 in this plan it states that a significant number of mines are currently undergoing expansion `supported by an increase in the export capacity of the Port of Newcastle.' So does this mean that the only reason we have to have extra mines & expansions is to feed the Port of Newcastle.
* On page 34 it states, `The Port of Newcastle is forecast to reach capacity by 2014. The proposed construction of Terminal 4 would increase the capacity of the annual coal export throughput of the port by between 60 to 100 million tonnes per annum and ensure sufficient terminal capacity to meet long term needs of coal producers.' If only it was up to 100million tonnes all up. The 4th coal loader on its own will increase the capacity of the Port of Newcastle by 120million tones.
Introduction
It is hard to find any justification for this proposal to go ahead. The concerns for the community not only in New castle & not only in just the Hunter region but also the whole of NSW will pay dearly if this goes ahead. Considering the affects of climate change means that this proposal will also affect the world.
The proponents note that a combination of development of alternative energy or policy change could derail their predictions of production rates and export capacities (Environmental Assessment 2012 Scenario 3 p298).
The rationale for the Port Waratah Coal Services Terminal 4 proposal is not justified and requires review.
The proponent's rationale clearly reflects a bias in favour of development.
Contrary to the assertion in the Environmental Assessment that the long term viability of the entire coal chain and Australia's reputation as an efficient and reliable coal exporter depends on the ability of Port Waratah Coal Services to deliver the T4 project, the export of coal is not threatened. It is the capacity demands "nominated by coal producer s" (Environmental Assessment 2012 pE.5) that is driving the project proposal.
The proponents contend that "coal production and export demand has outstripped the capacity of coal export facilities" leading to "reduced efficiencies, a large off shore vessel queue and associated environmental, safety and economic costs and risks" (Environmental Assessment 2012 pE.1).

The Port of Newcastle which services the Hunter Valley Coal Chain is the world's largest coal export in terms of throughput and is the economic and trade centre for the Hunter Region. (City of Newcastle 2011)
The proponents state that the costs and benefits will be weighed up to assess whether the T4 project would be of net benefit and that the benefit cost analysis will be undertaken against a "no project scenario".
However, the proponents fail to produce that scenario.
At this stage it is the anticipated growth in capacity turnover that has "triggered" (Environmental Assessment 2012, p26) the T4 proposal.
No evidence is produced to establish that further capacity is actually required.
It is of major concern to the community that our local MP, Tim Owen has stated that Port Waratah Coal Services is

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"The point about T4 is that PWCS is obligated to proceed with construction under the Hunter Valley Long Term Commercial Framework. So that process of approval with planning will proceed as intended." (email communication to local resident 30 April 2012, his emphasis)
The planning process should not be undermined by a member of the government effectively saying the proposal will be approved and the assessment of the T4 proposal is a irrelevant.
It is acknowledged that Port related industry and infrastructure is vitally important to the region, State and Commonwealth - we need to get its planning and implementation right.
The proposal does not represent the best interests of the state - it represents the best interests of Port Waratah Coal Services at the expense of the regional and local Newcastle economy.

The community does not accept that sufficient studies have been carried out to support the fast tracking of this proposal.

HEALTH IMPACTS
I regard the Port Waratah Coal Services Terminal 4 development as a significant threat to public health.
When the Port of Newcastle reaches the planned 331 Mtpa in coal exports, coal train movements from the Port of Newcastle to Muswellbrook and beyond will triple, with 108,000 train pass-bys per year (one every 4.9 minutes) in some townships. This increase poses health risks for residents living alongside the rail corridor from exposure to fugitive coal dust, diesel engine exhaust and train noise. T4 will contribute 39,344 of these annual train pass-bys.
Significantly, the EA has not modeled the cumulative impact of adding fugitive coal dust and other pollutants into the air surrounding the rail corridor. For T4 bound trains it gives PM10 estimates from loaded coal trains up to only 20 m beside the tracks (a projected additional up to 13 ug/m3, 24 hours). Exposures for residents up to 300 m away should be modeled.
The EA fails to assess baseline air quality along the rail corridor and how it will be affected by all train movements when the port is operating at 331Mtpa. Further emissions modeling is essential to report the cumulative impact of this continuous flow of trains in terms of PM10, PM2.5, diesel combustion pollution, and concentrations of Ultra Fine Particles. Modeling should include both the residual coal dust in unloaded wagons, as well as coal dust accumulated around the tracks over time that becomes airborne by the passage of trains.
By 2020, residents near rail lines will be exposed to an almost continuous intrusion of train noise and vibration. Round the clock movements wi ll include 135 nightly pass-bys (32 added by T4) when most residents are trying to sleep (between 11pm and 7am). Sleep is a biological necessity and disturbed sleep from intrusive noise has adverse health impacts, especially among children, the chronically ill and elderly, pregnant women, people under stress and shift workers.
The EA states that rail noise increases at night will push the 60dBA level impact zone from 320 m to 370 m from the tracks. This will increase significantly the number of residents exposed to noise disturbance. In 2009 the European standard for night noise was set at 40dBA.
The proponents state that T4 operations, with 120Mtpa of coal loaded onto 1,379 vessels annually at five berths, will achieve acceptable levels of dust emissions (PM10 & PM2.5) for surrounding residents. Critical flaws in dust modeling cast serious doubt on these predictions as they are based on assumptions about weather conditions, the accuracy of other pr ojects' emissions estimates, and fidelity of implementing `world best practice' dust mitigation control operations.
The EA does not provide a Health Impact Assessment whereby population profiles of affected residents near the site and rail corridor are defined and potential health impacts, especially on vulnerable groups (children, those in aged care facilities, people with existing respiratory and cardiovascular morbidity) assessed. Many of the local areas affected by the T4 include low income and elderly residents, who are most disadvantaged in terms of health status and who are most vulnerable to the added impacts of air and noise pollution.
The EA air quality modeling is inadequate to protect the public's health because it fails to include risk information about short-term exposures to particulates, which, over a period of even a few hours, can trigger cardiovascular-related mortality and morbidity, as well as adverse respiratory events. Even 15 minutes of exposure to diesel exhaust at 300ug/m3 produces significant cardiac ECG changes in susceptible people. Peaks of this magnitude can frequently be hidden within a 24 hour average of less than 50ug/m3.
T4 provides the necessary conditions for burning 120Mtpa of black coal, producing 298.6 million tonnes of CO_2 or 55% of Australia's current CO_2 emissions, and almost twice NSW's total emissions. In global terms, 298.6 mt of CO_2 is about 60% of the CO_2 that was added to the atmosphere globally in 2010 beyond the 2009 levels. This is a significant contribution to the health damaging effects of global warming, in Australia and overseas, produced through greenhouse gases.
Australian Academy of Technological Sciences and Engineering estimates that the monetary costs of damages to health due to the pollution from coal-fired power stations in Australia is $2.6 billion per annum, or $13/MWh. The T4 coal is destined to be burned in foreign countries and we are concerned that this health burden will fall on the population of those countries. The 120mt of T4 coal when burned will create costs associated with pollution damage to human health of $11.7 billion.

ENVIRONMENTAL CONCERNS
The Lower Hunter Estuary system is considered one of the most important estuaries in state.
At the very least, the proponents should establish a threshold of "acceptable" ecological impacts and resultant losses as a result of the impacts of their proposal.
The ecological value of this area cannot be understated in terms of its strategic location and present ecological communities. The potential for the development site area to either enhance the environmental integrity of the adjoining National Park and Ramsar wetland or adversely affect the environmental integrity of those areas needs to be more

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fully considered.
The area is presently acting as a buffer zone between heavy industry and an area of internati onal significance.
There is potential for cumulative impacts from the operation of the proposed development, over time, to erode the ecological values of the Hunter Estuary.

There is a single population of the Green and Golden Bell Frog (GGBF) that inhabits the areas presently known as Kooragang Island (KI) and Ash Island (AI), which form part of what is now a single island within the Hunter River.
This population is presently subjected to a considerable level of current and/or proposed development across areas owned and/ or managed by a number of different companies and agencies. Much of this development is occurring or proposed in the context of increased export of coal.
The surveys that have been carried out re the GGBF on KI/ AI seem to me to be adequate in terms of detecting the species and assessing areas of habitat that are likely to be important. The most recent surveys by PWCS are, on their own, inadequate for this purpose. However, there have been many other similar surveys and, when the results of all the surveys are combined, areas of GGBF habitat can be reasonably well assessed.
The estimated area of about 5 ha of GGBF breeding habitat that would be lost through the proposed development is, in my view, likely to be an underestimate. It is based only on areas where observations have been made of tadpoles and/ or metamorphs (i.e., animals that have both arms and legs, and hence have commenced metamorphosis into frogs, but still have a tail; when the tail has been completely resorbed, such animals are considered immature frogs). However, there are almost certainly additional areas that are similar or otherwise appear to be suitable breeding habitat, but where such evidence of breeding has not yet been recorded. Methodology exists to enable assessment of such additional areas of GGBF breeding habitat.
The documentation proposes the establishment of offset GGBF habitat to compensate for any such habitat that is lost to the proposed development, but it does not adequately address this issue. Relevant a priori issues are the location of such offset habitat, its extent, and its design features. A posteriori issues are the extent to which the GGBF is able to colonise and maintain long-term self-sustaining populations in such offset habitat. Discussion of these issues is vague or non-existent. There are two fundamental aspects of GGBF biology that must be kept in mind when assessing such proposals as the present one. The first is that there are some sites, where the GGBF occurs, that are to a large degree human-created. This indicates that we should be able to create or enhance areas of habitat that are suitable for this species, IF ONLY we can get the recipe right. It is incorrect to think that this is going to be simple or easy. The second is that most attempts to create/ enhance habitat for the GGBF have so far been either completely unsuccessful or have had very limited success. On this basis, it would be reasonable to argue that any area of offset habitat should, assuming that best practice habitat design features are adopted, exceed the area lost to development by a factor of at least 10.
According to the proponent's own assessment, 61 migratory species listed by the commonwealth have been recorded in the T4 project area and 27 of these species are listed on one or more of the international treaties for migratory birds such as the Bonn Convention, Japan-Australia Migratory Bird Agreement (JAMBA), China-Australia Migratory Bird Agreement (CAMBA) and Republic of Korea-Australia Migratory Bird Agreement (ROKAMBA). (Environmental Assessment 2012, p189)

The 312ha project sits includes 91ha of valuable native vegetation & 24ha of open water habitat. The project site is home to 18.8ha of saltmarsh (an endangered ecological community under the Threatened Species Conservation Act. 28.9ha of mangrove & 27.3ha of freshwater wetland, 4ha of which are listed an an endangered community under the TSC Act.
Notwithstanding the acknowledgement that the T4 proposal will destroy mangrove forest, wetlands and coastal saltmarsh, will significantly impact a range of species and the unknown effect from groundwater contamination, the proponent has the audacity to state that the T4 Project is not expected to adversely affect the adjacent Hunter Wetlands National Park or Hunter Estuary Wetlands Ramsar site.
While acknowledging that the Lower Hunter Biodiversity Conservation Corridor ("Our Green Corridor") provides a link from the Watagans to Port Stephens that is "highly significant" (Environmental Assessment 2012, p153), the proponent fails to assess the impact that their proposal will have on the adjacent corridor.
The impact of the proposed T4 development on the Green Corridor needs to be assessed.
Deep Pond is the only freshwater drought refuge in the Lower Hunter Estuary system. It is relied upon by at least 15 species of waterfowl, 3 of which are listed as threatened under the TSC Act.
Offsets are a joke. The proposed offset for this proposal (Ellalong) 50km away from Kooragang Is & is already high conservation value in its own right.
AIR QUALITY CONCERNS
The EA only considers the impact of increased coal train movements on residencies within 20me of the rail line. However, the impacts of coal dust are likely to extend far beyond this area.
The precautionary principle should be applied to potential health impacts of the 4th coal loader proposal. Approval should not be allowed until a more conclusive health & air quality study is undertaken for the Newcastle LGA.
A comprehensive health impact study must be carried out for all areas along the supply chain from mine to Port.
The significant health and amenity concerns for residents have been reported in the media. (The Herald, 27 April 2012, "Terminal illness Health Experts unload on $5billion coal proposal")
The Herald, 27 April 2012, p10
"Any exposure to particulate pollution is associated with increased adverse health outcomes, even if the levels are below the current guidelines". Dr Peter Lewis, Northern Sydney Central Coast area director for public health. (The Herald 30 October 2010 "Coal Dust Warning")
The T4 proposal would add 120 million tonnes of coal loading capacity at Newcastle - existing operational footprint is 145 million tonnes - plus the Newcastle Coal Infrastructure Group has approvals to build capacity of 66 million tonnes.
The industry must find new ways to reduce impacts. It is more than likely that complaints and impacts will increase - it's an already existing problem.
* Self assessment is not appropriate

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* Off site monitoring systems need to be located right along the coal chain
* Cov er all exposed coal right along the coal chain
* Regular check kits for home water tanks right along the coal transport chain
* Ensure all vehicles use high grade diesel fuel with no additives and exhausts have particle traps fitted
* Commit to activating stock pile sprays before exceedence of specified levels (approach should be proactive rather than reactive)
* Ensure that Carrington and Koorangang Coal Terminals are brought up to standard (that is, retrofitting of existing machinery, equipment and processes) prior to commencement of new coal loading facility

GROUNDWATER CONCERNS

Section 12 of the groundwater assessment document basically covers the issues at hand. The impacts associated with changes in groundwater flows and levels from the construction and the development along with the contamination issues should not be considered by the department lightly. I feel that the most stringent mitigation measures, as prop osed should be pushed to ensure the ecological areas of significance are not damaged.

In relation to the contamination areas. I think there are two main areas of concern. Firstly the FDF (fines disposal facility), a range of contaminated soil/sediment material has been placed in this area and the impact associated with the leachate could be quite significant to the surrounding environment from any possible risks created by the construction and the development. The implementation of a permeable reactive barrier as well as capping and then a strong environmental monitoring presence should be implemented around this area during construction/dredging and ongoing into the future.

Secondly the risks associated with the PAHs in the ponds at Site A being released into the surrounding environment presents a weak argument in the report. It appears to indicate that there are already potential risks with these areas of the Site and as such the development would not be creati ng anything new. If PWCS want to act in the most environmentally responsible manner than implementing the most appropriate remedial option presented should be done before any construction/dredging commences. In considering the assessment of PAH impact, the 95th percentile as stated in the ANZECC guidelines should be used in this instance and depending on the proximity to the wetland even the 99th percentile may be appropriate (which is more stringent). Thus the PAH levels currently reported are above these guideline trigger levels for the Site highlighting a need for some sort of action under the Contaminated Land Management Act 1997. Their argument of biodegredation of PAHs before reaching the Hunter River is weak and does not excuse the existing and potential risks to the environment from this area of impact.

Finally, i would like to point out from a human health risk potential (i have already mentioned my concerns with the dust in general), there are areas of lead d ust (and probably other heavy metals) and asbestos on the Site and he mitigation measures for construction works in these areas need to be considered not only for the workers but also the surrounding community.

The proponents have stated that (Environmental Assessment 2012 pE.11) further investigations and "refinements" of proposed measures to mitigate and manage groundwater contamination need to be taken. Their assumption that off-site containment levels will not increase or cause threat to environmental values and human health and that long term condition of the site will be improved, are unsubstantiated by the data presented.

It is not specified who will be made responsible for the planning, cost sharing, delivery, monitoring and reporting of all mitigation measures recommended.

As noted in the proponent's Stakeholder Engagement (Chapter 5 p84) "the Environmental Assessment must reflect a goal of no discharge of water to the Hunter River other than natural surface run-off in extreme weather events, during operation of the project." This "goal" is unacceptable - the site is adjacent to and contains pockets of ecological areas of State, National and global significance and is located in an at risk zone of rising sea level as well as designated flood zone.

CONTAMINATION & SOILS CONCERNS

the proposal poses the dilemma of compounding existing site contamination with further potential contamination (eg water spray run-off, potential flooding of containment ponds).

As noted by the proponent's consultants, the following require additional mitigation measures (Environmental Assessment 2012, pE.10)

* Tar waste at former KIWEF disposal cells
* Lead dust co-disposed with asbestos in KIWEF burial pits
* a localised area of light non-aqueous phase liquid (LNAPL) hydrocarbon contamination
* heavy metal, hydrocarbons and other contaminants at the Delta EMD s ite
* hydrocarbons and metals at the FDF
* benzene, PAHs, petroleum, phenols, metals, cyanide and ammonia at the OneSteel site

The proponents also advise that further investigations need to occur in order to "refine the management and remediation strategy" (Environmental Assessment 2012 pE.11).

Without the production of the proponent's management approach to containment and remediation, they are not in a position to state "The T4 Project provides an opportunity to reduce the existing contamination risks". Nor is the community assured that appropriate measures will take place in a timely and orderly manner.

Self regulation is an inappropriate option and one which the community distrusts.

The Environmental Assessment is incomplete without the detail on how the proponent would mitigate the impact from these contaminants if the proposal were to proceed.

TRANSPORT CONCERNS

It's a given that t ransport infrastructure underpins the key operations of T4 Proposal.

NSW Government Response to the Review of Port Competition and Regulation in NSW under the Council of Australian Government's Competition and Infrastructure Reform Agreement (Sept 2008) notes the coordination of port related supply chain services (p5) "A coordinated approach to freight logistics requires leadership, impartiality and a

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safe environment ..... To plan for improved performance"
We are not seeing improved performance - simply greater demand upon and expansion of substandard infrastructure and services.

ROAD
The report discusses staggered trips to miss peak volumes of traffic am and pm how will this be enforced. Kooragang Is peak traffic time actually starts from about 6am due to all the shift workers such as Stockton Centre & the RAAF base as well as workers on the Island. The peak hour traffic continues through till about 9 am. In the PM it s tarts from 3pm till about 6pm. I doubt if the staff working on the 4th terminal will start & finish outside of these times.
I find it hard to believe that a "tradie" parks his ute and all his tools are bussed onto the island - it wont happen - though a small quantity of workers may leave tools on site and be bussed on.
As a minimum T4 should be [conditioned if to proceed] to upgrade 2nd bridge on Tourle St river crossing - ditto the road that I assume is Cormorant Rd that comes off Tourle St Bridge - prior to any works being started.
`Coal Fired Gridlock' - `The Hunter's mining boom has created one of the State's worst traffic snarls along the New England Highway between Branxton and Singleton. Traffic data shows a similar number of vehicles now pass through the towns during peak periods as travel on Sydney's arterial roads." (The Herald 10 April 2012)
Martin Rush, Mayor of Muswellbrook: ,,Mines and council play catch up on bad roads‟ - "Over years, council had increasingly diverted it general revenues from its urban road network to prop up its mine affected rural road network. Prior to the network was hopelessly underfunded to support required infrastructure of
an ,,intensifying‟ Hunter coal industry" (The Herald 21 April 2012 p19)
We know that
* road destinations and haulage routes will result in heavy vehicle traffic and obviously have an adverse impact on the wider road network beyond the development site
* consideration of background traffic growth is based on old information, not the expected growth
* Cumulative impacts include

- existing Steel River Estate - other existing port related lands in Mayfield East, Mayfield North, Tighes Hill and Maryville - Newcastle Airport (servicing over 1 million passengers per year; Regional Development Australia (Hunter) report 2010-220) - Williamtown Defence and Airport Related Employm ent Zone - residential developments and industrial developments identified in Lower Hunter Regional Strategy (Dept Planning 2006)
All of these growth areas will contribute to incremental and cumulative increase in vehicle numbers entering the city via Industrial Drive and the surrounding road network.
Planned infrastructure improvements should be in place before construction of the proposal commences, including
1. Industrial Drive/ Tourle Street Intersection
2. Pacific Highway/Industrial Drive intersection
3. Intersections along Newcastle Road, Thomas Street and the F3 Link Road from Jesmond toF3 Freeway
4. The capacity and current condition of other classified and local roads in the vicinity of the site that might reasonably be used for haulage/construction worker access

The proponent should revisit the potential for exceedance of traffic noise criteria having regard to the likely impact of additional heavy traffic veh icle numbers in surrounding haulage route lines.
The Herald, 10 April 2012, p10
RAIL
Current timetabling of train services between Newcastle; Maitland and Newcastle is limited by the ARTC‟s requirements for maximum flexibility in scheduling of freight trains, limiting the possibility of additional passenger services (Newcastle City Council submission NSW Coal and Gas Strategy April 2011)
The T4 proposal requires upgrades to rail infrastructure and linking of mining areas to the Port of Newcastle

Greenhouse Gases
It is questionable that the required infrastructure will be able to adapt to the impacts of climate change.
Comprehensive consideration of issues involves identifying and profiling clear alternatives to their proposal has not been presented by the proponents.
The Hon Greg Combet MP addressed local and State government representatives in Newcastle in October 2011 to discuss risk management of rising sea levels. As reported by the The Herald (20 October 2011) "Higher seas could swamp coal-loaders" " the multibillion dollar coal export infrastructure has been identified as at risk from rising sea level".
Concern arises because the proponent's modelling presupposes the unlimited expansion of the coal industry regardless of greenhouse consequences.
It is stated that potential Greenhouse Gas Emissions were not considered relevant to the Benefit Cost Analysis because "the traditional and continuing practice is to undertake the BCA from a national perspective" (Environmental Assessment 2012 p301)
This is a global problem not just a national problem. The proposal totally and irresponsibly ignores the global pressure on particularly coal based industries to address and mitigate its contribution and legacy for global warming.
Global warming is considered the greatest threat to global economic and social welfare. The NSW Gover nment has undertaken to reduce greenhouse gas emissions by 60% by 2050 which is also the anticipated time frame nominated by the proponents for their proposal's life span.
This issue must be addressed in the proponent's environmental assessment.

ECONOMIC IMPACT CONERNS
The proponents base their assessment on the assumption that the growth of the mining industry will directly see to a growth in the regional economy overall. The proponents fail to acknowledge that the growth of the mining industry comes at the direct expense of other industries and the community.

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There is a strong likelihood that rapid expansion of coal production will result in the stranding of assets as early as in 10 years as the impacts of climate change accelerate and demands for carbon intensive industries disappear. (Ian Dunlop, The Future of Energy 2012)
The NSW Economy in 2020, A Fore sighting Study (Access Economics for NSW Innovation Council 2010) identified four megatrends that will have a major impact on NSW‟s future economy:
* National and global policy actions to address climate change
* Widespread adoption of new information technologies
* Demand and competition from emerging economies - esp. China and India and
* Demographic changes across Australia, especially a growing and ageing population

The Regional Development Australia - Hunter Regional Plan 2010-2020 notes a majority of the income generated by thermal coal and electricity generation accrue to the owners of the capital, meaning that a significant proportion of it flows not just out of the Hunter region but Australia.
The proponents state (p22) that economic benefits were greater than the costs, primarily distributed to
* Commonwealth Government in form of Company Tax. NOTE: the average rate of corporate tax paid by the mining industry in 2008-2009 was 13.9 per cent, substantially lower than the theor etical 30 per cent tax rate.
* NSW Government via royalties
* Local communities through contributions to community infrastructure. NOTE: primarily and more often than not, built to facilitate their industry.
* Coal mining companies and their shareholders. NOTE: around 83% of profits will in fact be sent offshore to the foreign owners of mining operations (The Australia Institute, Mining the Truth, David Richardson & Richard Dennis 2011)

What diminishes the validity of the proponent's Benefit Cost Analysis is the unquantifiable costs of long term health, social capital and environmental impacts to the community. It's easy to show the net dollar benefits to the vested interest, if you don't consider who loses as a result (the externalities).
The proponents maintain that the economic benefits are so large that these unquantifiable and hidden costs are worth incurring. The proponents further state that the community prefers to reap s uch benefits now rather than in the future (Environmental Assessment 2012 p298). Such spurious claims require independent analysis and justification and the proponents economic assessment requires a thorough rewrite, especially in light of the fact that the proponent admits combination of development of alternative energy or policy change could derail their predictions of production rates and export capacities (Scenario 3 Environmental Assessment 2012 p298).
The major dilemma for the community is that the state government and the coal miners are both totally driven by short term gain.
The community deserves better.
The cost of risking those elements of a sustainable society to the hidden costs of inappropriate development are not as easily quantified in a simple dollar return formula or by the proposed mitigating measures that may or may not be implemented effectively.
Obviously the legacy of the T4 proposal goes beyond the proponent's time frame. The proponent notes the possibility that due to the development of alternative energy or a policy change (perhaps they are referring to increase carbon tax?) resulting coal production and export is expected to cease around 2050. (Environmental Assessment 2012 p298)
The growth of coal exports presently and directly, adversely affects:
* Employment opportunity. NOTE: Mining only employs around 1.9% of Australian Workers (The Australia Institute).
The manufacturing industry actually employs around five times as many people as the mining industry.
After construction this proposal will not provide any new jobs. Adding to that is the loss of jobs in a number of other areas such as the lack of diversification in the Port, Tourism & Fishing.

* Manufacturing, agriculture, tourism. NOTE: the high exchange rate has reduced demand for our manufactured and agricultural goods as well as for our tourism and education export services, workers ex perience reductions in employment and therefore less job security.
I have grave concerns that Newcastle is again being placed in the position as being a 1 industry town. We went through this when the BHP downsized significantly in the 1980's & its eventual closure. Why are we doing this to Newcastle again with coal. Newcastle deserves much better planning we are the 2nd largest city in NSW, not that any NSW Government ever treats us with any great importance.

* Inflation is likely to rise during a mining boom
* Cost of living is likely to increase
* Housing affordability will decline. Homeowners are forced to pay higher interest rates across the board as the Reserve Bank seeks to control overheating which is actually concentrated largely in the resource- intensive regions of Australia. Anglicare Australia (Rental Affordability Snapshot) has reported low income Australians are being priced out of the private rental market in mining boo m towns (The Herald 1 May 2012 p19)
* Pushing out other exports (coal over 90% of exports from Newcastle) "While mining exports have increased by around 5% of GDP over the period since the beginning of the mining boom, non-mining exports have declined by around 5% of GDP over the same period ... the recent mining boom coincides with the largest and longest sustained decline in non-mining exports in the past 40 years." (Australia Institute)
* Intergenerational equity - The Environmental Assessment notes (p298) that approving the T4 proposal, by allowing coal export to be brought forward in time, has a potential benefit to Australia however this will forfeit any future net production benefits which may have arisen.
* The economic diversification of Hunter Regional investment and jobs growth opportunities which would buffer the area from economic downturn and structural change over the next 25 years. (Reference Regional Development Australia (Hunt er) Regional Plan 2010-202 "A more diverse economic base, including more employment in higher ,,added value‟ industries and more future facing sectors, including renewable energy are essential

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elements for economic growth" (p11).
* The industry has driven up the costs of skilled labour for businesses in other sectors - particularly service sector providers like the construction industry
* Competing demands between coal resource exploitation and land for agriculture, combined with population growth and urbanisation and the need for long term water security
* Fast, efficient and affordable transportation corridors and connectivity between centres within the region - for the community not just the coal industry
* The ability to mitigate greenhouse gas emissions

Before the determination of the T4 proposal the state government must:
* Finalise the NSW Planning System Review

During the Planning Revi ew community consultation process (2011), the Newcastle community particularly highlighted the need to remove the Part 3A Assessment process for significant development proposals. Not only was it recognised that the then present planning system appeared to exhibit an entrenched bias in favour of development, but it excluded community consultation.
More transparent planning laws that base decisions on the principles of Ecological Sustainable Development (that is, to achieve a level of development that meets the needs of the present without compromising the ability of future generations to meet their own needs) should be entrenched within the planning legislation to lead to a fairer assessment of the development proposal.
Consultation also highlighted the need for the community to have access to and input into strategic land use planning so that appropriate and sustainable decisions could be made.
It should be noted that The Natural Resources Commission co mmented: (Dept Planning Website) "generally assessment at a site by site basis through EIS is an inefficient way to deal with monitoring and reporting and that assessment of the tension between point sources of pollution and diffuse points of pollution and the transport of contaminants within that system needed to be addressed".
The planning system needs to entrench cumulative impact assessment. For the T4 proposal this should include all the proposed coal mining and coal handling chain proposals that feed the terminal.
The final Draft Planning System Review document has not been finalised.
* Finalise The Strategic Land Use Plan for the Upper Hunter

The Strategic Plan directly links the proposed export development at Newcastle as a prime ,,mover‟ for infrastructure expansion and improvements in the Strategic Planning Process for the Upper Hunter. It notes (p34) "The Port of Newcastle is forecast to reach capacity by 2014. The proposed construction of Terminal 4 would increase the capacity of the annual coal export throughput of the port by between 60 to 100 million tonnes per annum and ensure sufficient terminal capacity to meet long term needs of coal producers". It is apparent the State Government has relied upon data from the coal producers, not independent analysis.
The Draft Strategy presupposes the anticipated growth of the coal industry as expressed by vested interest throughout the production of the Draft document.
* Release the Newcastle Port Master Plan for community review

Without the production and exhibition of the Port Plan, the proponent, as well as the community, is unable to assess the T4 proposal in a ,,true light‟. Importantly the potential for cumulative negative impacts on the community and environment from not only theT4 proposal, but associated expansion of coal related industry facilities, cannot be assessed.
Cor respondence to Newcastle City Council from the Hon Brad Hazzard MP (2 March 2012) advised that the release of the Newcastle Port Master Plan for public comment would take place in the "near future".
Newcastle residents have been calling for its release for well over twelve months. However, in recent email communication (30 April 2012) Tim Owen MP, advised a local resident that the Newcastle Port Master Plan will not be released until the Port Botany scoping study is completed by government.
The T4 Project proposal should not be considered until the state government releases the Newcastle Port Master Plan for community review.

CONCLUSION
The Port Waratah Coal Service T4 proposal should be refused because:
1) the likely impacts of the development on the natural environment of the site are too great, resulting in the loss of important habitat for threatened species and endangered ecological communities and aquatic habita t - the site is not suitable for the development;
2) the likely impacts of the development on the natural environment neighbouring the site are too great, impacting on the Lower Hunter Green Corridor, the Hunter Wetlands National Park and the internationally listed Ramsar wetlands and species protected under international treaties of which Australia is a signatory;
3) the likely health impacts of the development on residents living in the suburbs surrounding the Port are too great, including the health impacts in suburbs along the coal chain as a consequence of this development;
4) the likely economic impacts of the development on the local and regional economy has not been adequately assessed, in particular the impact on the local fishing due to the predicted loss of fish and prawn habitat and the possible groundwater contamination from the development; and,
5) the proposal is not in the public interest, in particular because the development woul d facilitate an increase in greenhouse gas emissions when it is known that these pollutants increase the risk of catastrophic climate change, with a resulting increase in the frequency and intensity of weather events like the ,,Pasha Bulka‟ storm of 2007.

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So this proposal fails to identify and address much of the environmental consequences of the project. Fails to provide structures, methods and technologies that adequately address the noise, dust and vibration issues of the operation of the T4 project itself and the projects that T4 is directly and indirectly connected to. Fails to explain how PWCS will restore the site to its former state once the activity ceases. Fails to provide management strategies and risk assessments for much of the site operation and would seem to totally ignore off site issues that are directly linked to the project.
Falls well short of addressing the health, environment and pollution issues
Ignores the reme diation of the site at the end of the projects life.
Fails to demonstrate that the T4 use of the proposed site and the Hunter River is the best possible option for the site
Fails to prove that there is need for the project. Fails to recognize that their occupation of the stockpile area and port access will effectively close out any further major development for any other purpose. Fails to consider recreational and tourism activities or their potential of the locality.
Fails to demonstrate that the additional coal production from the mines can not be handled by the existing port facilities or by other arrangements.
Fails to prove that there is an economic benefit to Australia, to New South Wales, to the Hunter Region and to Newcastle LGA.
Fails to address the cumulative impacts of on its neighbours, the Newcastle LGA, the Hunter Region & NSW

The Port Waratah Coal Service T4 proposal is an inappropriate development

IP Address: - 153.107.33.154
Submission: Online Submission from cathy burgess (comments)
https://majorprojects.affinitylive.com?action=view_diary&id=29517

Submission for Job: #4399 Port Waratah Coal Services Terminal 4
https://majorprojects.affinitylive.com?action=view_job&id=4399

Site: #2406 PWCS Terminal 4
https://majorprojects.affinitylive.com?action=view_site&id=2406

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