

“Reclaiming our Valley”

Hunter Communities Network

PO Box 14 Singleton 2330

Att: Elle Donnelly
Department of Planning and Environment
Major Projects Assessment
GPO Box 39
Sydney NSW 2001

Wednesday 6 August 2014

Dear Ms Donnelly,

Submission of Objection

Warkworth Continuation Project SSD 6464
Mt Thorley Continuation Project SSD 6465

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.

HCN wishes to object to the proposed expansion of the Warkworth Mine including the integration of the Mt Thorley Mine into a ‘super mine’ operation.

The key objections to this proposal are based on the poor assessment of cumulative impact for the combined proposals and continued operation of the ‘super mine’ in the context of existing mining operations and recently approved expansions across the region.

HCN does not support that the cumulative impact of noise, dust, blasting, groundwater and surface water impacts and regional loss of threatened species habitat and Aboriginal cultural heritage has been adequately assessed for these proposals.

HCN considers the justification for the expanded size and the length of time of the operations, in the context of current decline in coal prices, is merely staving off the inevitable while causing increased irreversible environmental and social damage in the Hunter region.

The NSW Government has demonstrated no capacity for long term planning for the Hunter region or the ability to identify when key tipping points for social cohesion, environmental resilience and river health have been passed.

The lack of strategic planning in the Hunter is demonstrated clearly in these proposals. HCN submits the following recommendations to the Department of Planning and Environment:

Recommendation 1:

That the NSW Government commission an independent assessment of the cumulative increase in noise and dust emissions in the context of current approvals and proposed expansions in the vicinity of and adjacent to the Warkworth Mt Thorley complex.

Recommendation 2:

That the NSW Government commission an independent assessment of the cumulative impacts on groundwater and surface water systems in the Hunter River catchment in the context of current approvals and proposed expansions in the vicinity of and adjacent to the Warkworth Mt Thorley complex.

Recommendation 3:


That the NSW Government require the proposed extension of the Warkworth Mt Thorley complex to be assessed and resubmitted as an underground mine proposal.

HCN trusts that the Department of Planning and Environment will carefully consider the concerns and recommendations submitted on behalf of the community groups and individuals who have born the cost of coal mining in the Hunter region for a significant number of years.

HCN is very concerned that the proposal to expand the Warkworth Mine has continued to be supported by the NSW Government at all costs regardless of legal and public opinion.

The following submission outlines a number of concerns about the inadequacy of the environmental assessment of the proposal.

Yours sincerely



Bev Smiles
On behalf of Hunter Communities Network

Key Issues:

1. Cumulative impact assessment for air and noise pollution

Key issues relating to poor cumulative impact assessment include the failure to identify the recently approved mine expansions and proposals currently within the planning process in proximity to the Warkworth Mt Thorley complex.

These include the approval of the Carrington West expansion of the Hunter Valley North Operations and the proposed expansion of the Bulga mine.

A condition of approval for the Carrington West expansion, approved on 19 March 2013, requires that air quality management on site be co-ordinated with Warkworth Mt Thorley, Wambo, Ravensworth and HVO South to minimise cumulative impacts.

There was a similar condition for the management of cumulative noise impacts. These requirements are not referred to in the environmental assessment for the proposed expansion. Nor is the extent of the impact on private land owners adjacent to the mining operations.

The assessment of the proposal to expand the Bulga operations to the east of Mt Thorley identified that the Warkworth Mt Thorley complex is the larger offender with dust emissions in the locality when assessing cumulative impact.

The assessment of the Warkworth Mt Thorley complex expansion fails to identify that the Bulga proposal, if approved, will cause a 20% increase in dust emissions from that operation.

HCN is concerned that Wambo mine is identified in the Warkworth Mt Thorley complex assessment report as causing impacts on a particular property (264) without current acquisition rights. This is a typical example of each operation in this highly intensive mining area to point the finger at each other when impacts are identified.

This is a clear example of inadequate assessment of cumulative impact and inadequate conditions of approval to mitigate these impacts.

1.1 Predicted Noise Impacts:

The Mount Thorley environmental assessment identifies that representative locations at Warkworth Village and Mt Thorley will be impacted by increased noise and that additional properties are likely to be impacted, including property 264 that does not have legal acquisition rights for impacts from Wambo Mine.

The Warkworth environmental assessment identifies that an additional property in Bulga village will be impacted plus the same properties in Warkworth Village as identified in the Mount

Thorley environment assessment. Again, property 264 is identified as having ‘inferred’ acquisition rights from Wambo.

It is noted that noise limits at Bulga will be higher than predicted in the 2010 environmental assessment because of issues with modelled sound power levels for trucks used in the operation.

The surrounding community is already impacted by untenable noise levels because the Industrial Noise Policy does not protect remote rural communities from increased noise caused by open cut mining operations. The Broner criteria for low frequency noise, as referred to in the Warkworth environmental assessment, has never been presented to the community in a formal consultation process and is unacceptable as a policy for assessing the health impacts of low frequency noise.

1.2 Predicted Dust Impacts:

The measurement and reporting of high levels of PM₁₀ emissions by the Upper Hunter Air Quality Monitoring Network at monitoring sites near the Warkworth Mt Thorley complex are not identified in the assessment report.

The air quality predictions in both the Mount Thorley and Warkworth environmental assessments are identical ie that only two properties in Warkworth Village will be impacted by increased dust levels, including 264. This prediction is not accepted by HCN as an accurate assessment of current air quality conditions, particularly in dry windy conditions.

The lack of a comprehensive and independent cumulative impact assessment of air pollution in this area of the Hunter Region has caused significant impacts on neighbouring communities and other enterprises.

Recommendation 1:

HCN recommends that the NSW Government commission an independent assessment of the cumulative increase in noise and dust emissions in the context of current approvals and proposed expansions in the vicinity of and adjacent to the Warkworth Mt Thorley complex.

2. Cumulative impact assessment for surface and groundwater impacts.

2.1 Final Void:

HCN is concerned that the final landform for the Warkworth Mine includes a large void. It is commendable that the proposal is to back fill the currently approved final void in the Mt Thorley pit. However, HCN does not accept the argument that there will be insufficient material to back fill the Warkworth pits.

The long term cumulative impact of multiple large final voids on the floor of the Hunter Valley is unknown and has not been adequately assessed.

2.2 Groundwater Impacts:

The cumulative drawdown on groundwater systems within this area of the Hunter River catchment has also not been clearly assessed or predicted. The close proximity of the Warkworth Mt Thorley, Wambo, Ravensworth, HVO South & North and the Bulga mining operations is a major disturbance of natural resources on a significant scale.

The mine by mine approval process with no clear cumulative impact assessment process for permanent loss of groundwater systems is an abrogation of the NSW Government responsibilities.

The proposal to monitor possible impacts on the perched aquifer that supports the Warkworth Sands Woodlands endangered ecological community (EEC) does not identify actions to be undertaken if drawdown is measured. It is unacceptable for management and mitigation measures to be developed after the proposal has been approved.

The ability to adequately regulate conditions relating to the potential loss of the perched aquifer supporting the Warkworth Sands Woodlands EEC is highly unlikely.

2.3 Surface Water Impacts

Both environmental assessments refer to the operation of the Hunter Salinity Trading Scheme (HRSTS). HCN is concerned that proposed changes to the Hunter Regulated Water Sharing Plan to permit extraction of higher flows may severely restrict the operation of the HRSTS for the Warkworth Mt Thorley complex. There has been no reference to these possible impacts or alternative solutions provided for the management of highly saline mine water.

The proposed loss of flow to the Wollombi Creek has not been identified in the context of cumulative losses from adjacent mining operations eg Wambo Mine.

There has been acknowledgement across many sectors of the community that the cumulative impact of mining on the Hunter River system has not been adequately assessed. HCN does not support the prediction that these proposals will not add to the existing degradation of this major river system.

Recommendation 2:

HCN recommends that the NSW Government commission an independent assessment of the cumulative impacts on groundwater and surface water systems in the Hunter River catchment in the context of current approvals and proposed expansions in the vicinity of and adjacent to the Warkworth Mt Thorley complex.

3. Cumulative impact assessment for social impacts

3.1 Impacts on property market

The major issue of concern for the community affected by mining operations is the ongoing acquisition of private property and loss of social cohesion in rural areas. The distortion of the property market, loss of property values and lack of genuine compensation for loss of amenity and replacement values are not clearly considered or outlined in the costs benefits analysis.

Properties not identified in acquisition zones often become stranded assets because current Government policy such as the Industrial Noise Policy does not protect rural communities from the health impacts of heightened noise levels. Properties near open cut mine operations often become unsaleable. This impact has not been identified or assessed across the Hunter region.

The fact that the mining industry paid \$9,854,273 in rates in the Hunter Region in 2012/2013 is an indication of the scale of land ownership and the sterilization of property from functioning communities.

The loss of social cohesion and community assets has not been clearly identified or acknowledged within the planning and approvals process. There is no assessment of the extent of private land acquisition approved in the area near the proposed expansion.

3.2 Poor justification

HCN strongly objects to the emphasis on the current jobs at the mines in the social impact assessment. If the price of coal continues to decline, the job losses will occur regardless of the approvals process.

There has been no long term planning for the Hunter region in regard to mine closures or the movement into care and maintenance mode. This scenario is increasing in the Hunter as the structural decline in coal prices and demand deepens.

The justification to continue to dig more coal faster, which is the basis for these proposals, is economically unsound. The very high strip ratio of overburden to coal for the Warkworth and Mt Thorley operations is the cause for them to be both economically and environmentally costly.

If the NSW Government is regarding the value of the resource as its prime consideration for this mine expansion, then it must require the assessment of an underground operation. This would minimise the surface disturbance of the environment and the community while still providing the public benefit of the coal royalties, jobs and taxes.

Recommendation 3:

HCN recommends that the NSW Government require the proposed extension of the Warkworth Mt Thorley complex to be assessed and resubmitted as an underground mine proposal.

4. Conclusion:

The current state of approved and proposed expansion of extraction levels and time span for mining operations in the Hunter is irresponsible and not considered in the context of long term cumulative impacts and costs. The response to a collapse in coal prices is not being conducted in a rational manner and needs to be reconsidered.

Jobs in coal mines in the Hunter region cannot last forever. Planning for a transition into a more diverse range of industries is required for the region to maintain economic and environmental viability in the long term. The approval of the proposed expansion of the Warkworth Mt Thorley complex will not help to achieve a sustainable future for the Hunter.