

WOLLAR PROGRESS ASSOCIATION

C/O- POST OFFICE

WOLLAR NSW 2850

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Friday 30 October 2015

Submission of Objection

Bylong Coal Project: SSD 14_6367

Wollar Progress Association wishes to lodge an objection to the proposed Bylong Coal Project because of the unassessed cumulative impacts on our community.

The social and environmental impacts of the existing three large coal mining operations in our locality have been far greater than predicted. A fourth mine will increase road traffic through Wollar village, increase the number of trains idling in the Wollar rail loop and cause additional loss of farmers and community members from the general area.

The environmental assessment report fails to identify or assess these cumulative impacts on the Wollar community.

1. Road Issues

The Traffic and Transport Impact Assessment (Appendix Z) ('traffic report') identifies the Wollar Road as a main route for mine traffic movements to and from Mudgee.

The Bylong Mine proposal has a main daily traffic route from Mudgee to Bylong through the Munghorn Gap Nature Reserve on the Wollar-Mudgee Road.

An upgrade of the Bylong-Wollar Road has been identified and funded through the Royalties for Regions program. This is expected to have been completed by Year 1 of the project construction. However, there has been no analysis of the impacts of increased daily traffic usage of the Wollar-Mudgee Road beyond Wollar and through the Munghorn Gap Nature Reserve to Mudgee.

The traffic report recommends that a formal road safety audit is needed (p 27) and road dilapidation inspections be conducted prior to commencement of construction. We consider this to be a critical requirement of the project assessment prior to approval.

The current condition of the Wollar-Mudgee Road has not been assessed in the traffic report.

The Wilpinjong Coal Project was originally designed and approved to use the Wollar-Mudgee Road as the mine traffic route with the main mine entrance on that road. The approval required a comprehensive traffic study to be conducted.

The outcome of the study was a modification of the mine plan so that the main mine entrance was shifted to the south on the Wollar-Ulan Road and all mine traffic re-routed to use the Mudgee-Ulan Road.

This was because the width of the sealed road through the Nature Reserve was inadequate for the safe passage of heavy mine traffic and the large number of daily movements.

The traffic report identifies that Mid-Western Regional Council (MWRC) has forecast that the sealing of the Wollar-Bylong Road with the Bylong Mine in operation will attract 500 – 1,000 vehicles per day. This is an increase of 250% - 600% on existing daily traffic movements on Wollar Road (p 34).

The traffic report outlines that the Annual Average Daily Traffic (AADT) on the Wollar Road based on 2011 counts was 161 vehicles with 20% heavy vehicles between Bylong and Wollar and 455 vehicles with 7% heavy vehicles between Wollar and Mudgee. These figures are now four years old and do not provide an adequate background traffic count.

The Wollar-Mudgee Road has recently been severely impacted by several months of re-routing of all Wilpinjong Mine traffic through Wollar village caused by the closure of the Wollar-Ulan Road after a threatening highwall collapse at Moolarben Mine.

The condition of the road has deteriorated with this increased usage. A full assessment of the Wollar-Mudgee Road needs to be conducted.

The analysis of intersection impacts in the traffic report (5.2 p68) fails to acknowledge that the intersection of the Wollar-Mudgee Road and Wollar-Ulan Road is in the middle of the Wollar village.

Wollar Progress Association does not support the conclusion in the traffic report (p20) that a cumulative impact of the expansion of existing mines will not exist.

The fact that the Moolarben Stage 2 Traffic Impact Assessment did not distribute any traffic movements to Wollar Road or the Bylong Valley Way demonstrates the inadequacy of that assessment report.

Contractors travelling from the Muswellbrook area to the three existing mines regularly use the Bylong Valley Way and Wollar Road, often breaking the speed limit. More recent traffic counts through the Wollar village are necessary to provide more accurate background traffic movements.

The current impacts of mine traffic on Wollar village, road condition and public safety have not been adequately assessed. The major increase in traffic movements proposed by the Bylong Coal Project will have a significant impact on the safety and amenity of the Wollar village.

2. Rail and Air Quality

The Executive Summary of the Bylong Coal project states that the project will require an average of 2 trains per day and a peak of 10 trains per day (p 51). This is assuming that standard 96 wagon trains are used.

The traffic report, in reference to rail movements, indicates that the current maximum train use on the Sandy Hollow railway line is 91 wagons (p 28). Kepco has been in discussion with ARTC to increase train length to 100 wagons.

The assessment of rail impacts does not analyse the cumulative impact of increased daily train movements on the Sandy Hollow railway line up to a peak of 10 additional trains per day.

Wollar Progress Association is concerned that the increase number of rail movements from the Bylong proposal, including a possible increase in the length of trains, will cause more trains from the three existing mines to sit idling in the Wollar rail loop. This lies immediately to the east of the village.

Ambient air quality was monitored in Wollar village in 2013 because of spontaneous combustion events at Wilpinjong Mine. One of the pollutants measured in the village was oxides of nitrogen.

The air quality expert for Wilpinjong Coal expansion proposal, Aleks Todoroski, has attributed the measured levels of nitrous dioxide (NO₂) in Wollar village to diesel engines.

The community is concerned that there has been no air quality assessment conducted on the impact of idling trains in the Wollar rail loop. A potential increase in air pollution could be caused by more regular use of the Wollar rail loop and longer periods of idling diesel engine emissions.

The cumulative impact of increased train movements on the Sandy Hollow railway line caused by the Bylong Coal Project has not been adequately assessed.

3. Social Impact Assessment

The Social Impact Assessment fails to identify the cumulative loss of farming and rural population from the Ulan to Bylong localities due to mining expansion over the past 10 years.

The Bylong/Wollar/Ulan communities have had close associations for generations, both socially and through farming business activities. The three small schools regularly joined together for sporting and cultural activities. Families and community members have supported various social, sporting and fundraising events across the localities.

The loss of the three Rural Fire Services from the villages of Ulan, Wollar and Bylong due to loss of population has been a critical negative outcome of mine land acquisition in the region.

The capacity for volunteer provision of emergency services in times of fire and road accident has been severely diminished. The Social Impact Assessment fails to identify these key cumulative impacts.

The loss of the Upper Bylong Public School, diminishing numbers at Wollar Public School and uncertainty with mine pollution impacts at Ulan Public School has had a significant impact on the educational resources and activities in the region. Schools are the core of a rural community.

The social fabric of the region has deteriorated significantly with the impacts of the Ulan, Moolarben and Wilpinjong Mines. The proposed fourth large mining operation in the area will cause further loss of farming expertise and support services, such as cattle transport and fuel deliveries, social support and community viability.

The cumulative social impacts on the isolated rural communities in the region have not been addressed in the Environmental Impact Assessment for the Bylong Coal Project.

4. Conclusion

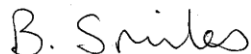
Wollar Progress Association considers that the cumulative impacts of the Bylong Coal Project on our community will be significant. These impacts have not been identified or assessed.

The Secretary's Requirements have not been met. Therefore, the proposal cannot be considered for approval until additional assessment work is conducted.

Recommendations:

1. That the formal road safety audit be conducted as part of the project assessment.
2. That the current condition of the Wollar-Mudgee Road is assessed as part of the project assessment
3. That the cumulative impact of additional train movements on the Sandy Hollow railway line is adequately assessed, including air pollution in Wollar village
4. That the wider cumulative social impacts of land acquisition for mining be assessed.

Yours sincerely

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

Bev Smiles
Secretary