Bylong Coal Project

Reference Number: SSD 14_6367

Email:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6367

Submission

The Minister for Environment should reject the Bylong Coalproposal due to the <u>significant</u> impact on matters of national environmental significance. This includes:

The predicted long-term impacts on prime agricultural land and water systems in the Bylong Valley are unacceptable and will not be mitigated through proposed offsets and rehabilitation.

The renowned Tarwyn Park natural sequence farming processes will be destroyed.

A significant area of prime agricultural land will be destroyed: the mine footprint will disturb 2,875 ha of land including 440 ha of Bioregional Significant Agricultural Land (BSAL), 260 ha being destroyed in open cut, plus 700 ha of mapped Critical Equine Industry Cluster land.

The proposal to replace BSAL at another location is untested and high risk.

Impacts on groundwater and surface water will be significant. The highly connected alluvial aquifer system within the stressed Bylong River catchment will have predicted peak losses of up to 295 million litres per year (ML/yr). Loss of base flows to the Bylong River is predicted to be 918 ML/yr. The mine proposes to use up to 1,942 ML/yr which is over 75% of the annual rainfall recharge. The river system is over allocated and local farmers will lose important water supply.

The mine disturbance area has very high biodiversity values that will not be mitigated through the proposed offset arrangements. Nationally endangered species recorded in the area include the Brush-tailed Rock Wallaby, New Holland Mouse, Regent Honeyeater and Spotted-tailed Quoll. Three entirely new plant species were recorded. A significant area of critically endangered Grassy Box Gum Woodland will be destroyed along with habitat for 17 threatened birds and 7 threatened plants. This requires a much more detailed assessment process than is carried out under the NSW planning requirements.

The area has Aboriginal cultural heritage significance: 239 sites were recorded in the study area with 25 regarded as being of high local or regional significance (including an ochre quarry, grinding grooves and rock shelters); 144 sites have been identified at risk from mine impacts with 102 in the open cut area.

Important European heritage, including the Catholic Church Cemetery, Upper Bylong Public School and a number of historic homesteads and farm buildings will be destroyed in the open cut. The social impacts on the Bylong community have already been devastating.

To date, there has been no research into the impacts of noise, dust on fauna/flora or

the local community.

The assessment and approvals process in NSW is inadequate for large proposals of this type that are likely to cause significant impact on matters of national environmental significance.

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