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Submission in Response to SSD4966 – Stratford Extension Project

I am opposed to the proposed Stratford Extension Project for the following reasons:

1. 24-hour mining operations will impose an intolerable noise burden over a very wide area.
2. Noise impacts are already felt by residents and the expansion will make it worse.
3. Health impacts arising from coal dust and diesel exhaust fumes.
4. Mining so close to Stratford village will make living there intolerable.
5. Lighting of the site is already a problem for residents and will worsen with any expansion.
6. Reduction in property values.

I fully support the submissions lodged by Gloucester Shire Council and the Barrington Gloucester Stroud Preservation Alliance (BGSPA) in their opposition to the Application.

In particular I support these recommendations:

1. *The EIS should be rejected and Yancoal required to address its deficiencies.*

This is because the EIS is deeply flawed and hence inadequate for the purposes of enabling the Department to fully assess the merits of the application. Many of the impacts are understated and much of the proposed mitigation is either inadequate or overly ambitious.

Also, the EIS is not truthful. It pretends that mining will cease at the conclusion of this project. Yancoal has previously revealed plans to continue mining at Stratford for many more years. Residents are being asked to support the continued and expanded operation of mining without being provided the full facts.

2. *24-hour mining should be rejected.*

24-hour mining is unacceptable. It is strongly opposed within the community on the basis of predicted effects, current experience of noise from existing mining operations, and past experience of 24-hour mining that was disallowed following completion of mining in the Stratford main pit.

Intrusive noise disturbance from the Stratford mining complex is a significant problem for neighbouring residents. The concurrent mining of three widely separated pits will result in a substantial increase in the area potentially affected by intrusive noise. The proposed return to 24-hour mining operations will greatly exacerbate the noise disturbance.

3. *Noise issues*

- ***The Noise & Blasting Assessment should be re-presented with a comprehensive assessment of noise characteristics that will be generated by the project including presentation of C-weighted data. The noise impacts should be identified in terms that a layperson can understand.***

- ***The number and size of blasts should not exceed current consent conditions.***

Noise modeling used for the project is inadequate as it doesn't give sufficient weight to the low frequency components of noise that are characteristic of mining operations. This means that the noise impacts are most probably understated. They should be reassessed.

Blasting has the potential to cause physical damage to property and psychological harm to people.

4. Health impacts

- ***There should be an immediate and on-going health audit for Stratford residents.***
- ***There should be compulsory monitoring for particulate matter of PM2.5 which is known to be the most dangerous to health.***
- ***Household tank water should be tested for toxic pollutants.***
- ***Yancoal should pay for regular cleaning of water tanks and replacement of filters.***

The proposed expansion will bring mining too close to Stratford village. Residents are already impacted by noise from mining and blasting, dust and poor air and water quality. The health impacts arising from coal mining are now being more widely recognized and reported in the Hunter.

The adverse affects of coal dust are well recognized, but there is no reference or discussion of this in the EIS.

5. *An integrated study should be undertaken to assess the cumulative ground and surface water impacts of the proposed coal and coal seam gas projects. No project approvals to be given until this study is completed and impacts assessed.*

The cumulative impacts of successive mining approvals and proposed new mining projects have not been adequately considered. One of our biggest concerns is the impact on water. There needs to be a combined approach to the assessment and analysis of the ground and surface water situation and particularly, the impacts of the large groundwater extractions created by these projects. This should be implemented before any project approvals are considered.

6. *Stratford should be placed in a zone of affectation and Yancoal be required to purchase properties in this zone, if approached by the owner.*

Many older residents who will be looking to sell because they can no longer manage a rural property will become trapped because there is no market demand for properties impacted by the mine. Additionally, people living in Stratford village may need to relocate for health and other reasons, but find they cannot sell their home due to the mine. This is immoral.

7. *Areas of identified and potential habitat of threatened species should not be cleared.*

The incremental expansion of mining operations has also caused a progressive whittling away and increasing fragmentation of native vegetation. The resultant cumulative impacts on native fauna and flora are significant and have not been adequately recognized. The proposed expansion will severely impact a number of threatened species. The mitigation measures proposed are inadequate.

8. *The socio-economic justification for the project should be re-presented to (1) address the deficiencies identified in the two independent reports and (2) evaluate the impact of the project on tourism and the alternative economic model.*

Gloucester is well positioned to benefit from an alternative approach to regional economic development based on agriculture and food production. Tourism is already an established and important industry that relies on our scenic beauty and natural heritage. Mining expansion poses an enormous threat to tourism and is likely to kill off the emergent food production potential.

Two independent studies have assessed the economic justification for the project. Both conclude that the social and economic assessment sections of the EIS are not suitable for decision making in their current form because they fail to clearly demonstrate the economic costs and benefits of the project. The local community will bear all the costs and receive very few of the benefits. The social costs will clearly outweigh the economic benefits of such a marginal project.

(signed)
Bruce Gilbert