

**LT Creek Sustainable Neighbourhood Group's submission to the Northern Coal Services Northern Coal Logistics Project, EIS Report.**

Application No. SSD-5145

7 November 2014

**Introduction**

LT Creek Sustainable Neighbourhood Group (LT Creek SNG) was established in 2010 and is a part of Lake Macquarie City Council's Sustainability Program. LT Creek SNG consists of the suburbs of Blackalls Park, Fassifern and Fennell Bay. The vision/mission statement of the group is 'To restore and protect our waterways and bushland; to strengthen, educate and connect our community; to reduce our neighbourhood ecological footprint and maintain our peaceful environment.'

We appreciate the relationship established with Centennial Coal and we hope to continue the association with our mission statement as the focus. We consider the responsibility of our waterways and bushland in a holistic context, which not only includes the catchments of LT Creek and Stoney Creek but of west Lake Macquarie.

**Social Impact Assessment**

LT Creek Sustainable Neighbourhood Group (LT Creek SNG) encompasses the suburbs of Blackalls Park, Fassifern and Fennell Bay. Fennell Bay is less than 1.5km from the Newstan surface facility. It has LT Creek bordering the suburb.

The Social Impact Assessment (SIA) fails to take into consideration the suburb of Fennell Bay in its assessment and statistical analysis, thus not giving an accurate representation of the community. The SIA has not acknowledged the percentage of residents that are on pensions or a self-funded retirees.

The SIA also fails to acknowledge in its summary of air quality modelling and projections that NC6, Fassifern Public School may have exceedences of PM<sub>10</sub>, depending on the scenario as shown in fig 61 and 62, pages 313 and 314 of the main volume of EIS.

LT Creek SNG would like the DoP&I to note that the area is seeing a shift from low density housing to medium density housing. There are approximately 20 existing medium density properties in Blackalls Park. A 15 unit residential development has been approved for Railway Parade, Blackalls Park. A 94 residential apartment development for over 55's (ELEMENTS of Toronto) has been approved on Toronto Workers Club Land approximately 5km away from Newstan.

## **Water**

The LT Creek SNG acknowledges the work that Centennial Coal has done with the water management plans in regards to the northern arm of LT Creek and Stoney Creek. We support the construction of Licenced Discharge Point (LPD003) on the south arm of LT Creek as this will assist Centennial in efficient and accountable water management and their relations with the Community. The South Arm is still of some concern to the residents.

LT Creek SNG is very interested in the piping of LT Creek and hopes, as in the past, Centennial will continue with an open and accountable consultation process with the group.

## **Flora and Fauna**

West Lake Macquarie's natural environment is under considerable pressure with the continuous development in area, including residential and the continuous development by Centennial Coal. Centennial's projects for an increased share of the coal market has and will continue to see cumulative pressure on the biodiversity of the area and the cumulative decline of threatened species such as *T. juncea*.

The Proponent considers itself to a responsible corporate environmental citizen and as stated in the Statement of Commitments, Section 12.4 of the main report has sought to avoid and minimise potential ecological impacts.

LT Creek SNG would appreciate and request the following responses by Northern Coal Services (Centennial Coal):

- A. For parcels of land to be offset into the Awaba Conservation Area for the conservation and protection of biological diversity and ecological integrity.
- B. For the Company to closely monitor and communicate their progress and findings to the CCC,

LT Creek SNG, LMCC and OEH in regards to:

- 1. the nesting box program
- 2. the *T. juncea* translocation research project
- 3. the development and implantation of the research project investigating genetic patterns among and within the populations of *T. juncea*.

LT Creek SNG suggests that Jigadee Estate, 1174 Freemans Drive Cooranbong should be a point of operation for the research projects as it is owned by Centennial Coal and is known to have significant biodiversity and a number of threatened species including *T. juncea* on site.

### **Air Quality and Green House Gases**

Air Quality is one of the major concerns for LT Creek SNG and regardless of national standards and emissions, it is important for the NSW Government and Centennial Coal acknowledge and act on the concerns of the residents of west Lake Macquarie. As mentioned in the Social Impact Assessment, Lake Macquarie is a growing city. This particularly true for west Lake Macquarie. The DoP&I predict that the key driver for Lake Macquarie population growth will be an increase in seniors moving to the city.

Concerns of the residents generally and of the LT Creek SNG include the increase of coal dust including Total suspended particles, PM<sub>10</sub> and PM<sub>2.5</sub>. This air pollution impacts on the residents not only with visual amenity of their homes and subsequent domestic cleaning duties but on the health of residents, particular those who are prone to respiratory diseases such as Asthma.

It must be noted, while Centennial operate under best practice methods with their road transport the increase of 28 truck movements to 32 per hour will accumulate to an extra 96 truck movements in a 24 hour period. In regards to GHG and air quality there will still be a cumulative increase in the effects of air pollution.

Concerns of air quality and GHG extend to rail system of coal transport. In the project description overview (pg. 119) plans to increase transport coal from Newstan to the Ports of Newcastle and/or Kembla and/or Vales Point Power Station from 3Mtpa up to 8 Mtpa. While Centennial claims that the amount of train movements will remain the same, eight per day, there would need to be variance in the number of locomotives and wagons to haul the additional 5Mtpa.

It is our understanding that Centennial Coal has at least a fleet of seven C44ACi Standard Gauge Heavy Haul Locomotives and in trials three of these locomotives could haul 50 wagons of coal from Fassifern to the Port of Newcastle. On page 205, under 8.1 Project Optimisation, projections of coal haulage could be up to 60 wagons with a maximum loading rate of 4500 tonnes per hour. This would mean another locomotive would be needed. If this is the optimum haulage to move 8 Mtpa of coal, this will have a significant impact on air quality and GHG on the residents of west Lake Macquarie.

Under the existing approval for Newstan, the train loading system is to be automated when export exceeds 3 Mtpa. LT Creek SNG asks that to stand as it is.

LT Creek SNG also requests the following, that:

Centennial implement additional sensitive receptors to the modelling and projections of air quality and GHG monitoring at Awaba, Blackalls Park, Fassifern, Fennell Bay, Toronto and Woodrising, with the findings reported to the CCC.

Centennial Coal becomes an industry leader and cover their coal wagons

Dedicate research into PM<sub>2.5</sub>, its distribution and fall out, as well as the health effects of this particulate matter on the population.

Assess air quality impacts associated with emission products of combustion from vehicle engines. This was not carried out by the consultants (pg 306).

### **Conclusion**

LT Creek SNG, as mentioned above, requests the following:

- A. For parcels of land to be offset into the Awaba Conservation Area for the conservation and protection of biological diversity and ecological integrity, including an extensive pest and weed eradication management program;
- B. For the Company to closely monitor and communicate their progress and findings to the CCC, LT Creek SNG, LMCC and OEH in regards to:
  - 1. the nesting box program
  - 2. the *T. juncea* translocation research project
  - 3. the development and implantation of the research project investigating genetic patterns among and within the populations of *T. juncea*.With Jigadee Estate, 1174 Freemans Drive Cooranbong being the research hub for these projects;
- C. Have a dedicated research project into PM<sub>2.5</sub> and its Effects, in which the results are shared with the CCC, LT Creek SNG, LMCC and the OEH;
- D. The automated train loading system is installed when exports exceed 3Mtpa;
- E. Coal wagons are covered;

F. Impact assessments on emissions products of combustion from vehicle engines are completed;

G. Centennial implement additional sensitive receptors to the modelling and projections of air quality and GHG monitoring at Awaba, Blackalls Park, Fassifern, Fennell Bay, Toronto and Woodrising. The results to be presented at the CCC meetings.

LT Creek SNG look forward to continue to associate with Centennial Coal in the betterment of environment and reducing the neighbourhood's ecological footprint.

Robyn Charlton

Chair

LT Creek Sustainable Neighbourhood Group