

## **Submission to the Northern Coal Services Northern Coal Logistics Project, EIS Report**

16 November 2014

Application No. SSD-5145

### **INTRODUCTION**

Lake Macquarie is a growing city, with a Council and community dedicated to the environmental health of the City on a natural and built context. It is also a city with strong community values where Lake Macquarie City Council and the residents work together in making the city a better place for all. This is demonstrated in Council's involvement with Landcare and the implementation of the Sustainable Neighbourhood Program. Council's commitment to the Environment and its residents is reflected in the Lifestyle 2030 Strategy.

As a resident of Lake Macquarie, particularly West Lake Macquarie, I share the strong community and environmental values demonstrated by Council and its residents. I believe that the principles of ecological sustainable development which includes:

*the precautionary principle,*

*inter-generational equity,*

*conservation of biological diversity and ecological integrity*

*improved valuation, pricing and incentive mechanisms*

should be strongly upheld for the betterment of the City, particularly for those in the West Lake Macquarie district.

Due to time constraints and the sheer volume of the EIS, this submission will focus on the assessments of social impact, ecology and air quality/greenhouse gases.

### **DISCUSSION**

Lake Macquarie is a growing city, as stated in the Social Impact Assessment, "The Lake Macquarie LGA is one of the fastest growing cities in the Hunter, and one of the largest cities in NSW. In summary:

- Lake Macquarie's population is approaching 200,000 people.
- Lake Macquarie is the Hunter's largest city, accounting for 37% of the Lower Hunter population.

- Lake Macquarie is the fourth most populous city in NSW, and the eighth most populous city in Australia.
- The population of Lake Macquarie is expected to grow by 60,000 – 70,000 people over the next 25 years, which will create a demand for 36,500 new dwellings.

***In its Lifestyle 2030 Strategy, the vision for the City, held by Council and the community, is that it is a place:***

- ***Where the environment is protected and enhanced.***
- ***Where the scenic, ecological, recreational, and commercial values and opportunities of the Lake and coastline are promoted and protected.***
- ***With a prosperous economy and a supportive attitude to balanced economic growth, managed in a way to enhance quality of life and satisfy the employment and environmental aims of the community.***
- That recognises, encourages, develops its diverse cultural life and talents, protects, and promotes its heritage.
- That encourages community spirit, promotes a fulfilling lifestyle, enhances health and social well-being, encourages lifestyle choices, and has opportunities to encourage participation in sport and recreation.
- That promotes equal access to all services and facilities and enables all citizens to contribute to and participate in the City's economic and social development.
- That promotes affordable housing.”

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,

[http://www.planning.nsw.gov.au/Portals/0/HousingDelivery/LGA-Lower\\_Hunter\\_and\\_Central\\_Coast.pdf](http://www.planning.nsw.gov.au/Portals/0/HousingDelivery/LGA-Lower_Hunter_and_Central_Coast.pdf).

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. The village of Teralba, which is less than five kilometres from the Newstan site, has a 450 home development, by the McCloy Group, approved.

Fassifern is host to two medium density public housing properties and approximately 4 privately owned medium density housing properties. Fennell Bay also hosts medium density housing properties.

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. Toronto, the nearest population centre and a growing town, only receives a fleeting mention but is not considered in any statistical analysis. Yet it is less than four kilometres away from Newstan. The SIA has not acknowledged the percentage of residents that are on pensions or 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 exceedances 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.

There are a number of educational facilities in the Blackalls Park, Fennell Bay and Fassifern area. These include Blackalls Public School, Blackalls Park Pre-school, Fennell Bay Public School, Fassifern Public School and Charlton Christian College.

Other education facilities less than five kilometres from the train line include: Awaba Public School, Teralba Public School, St Pauls Catholic High School (Booragul), Booragul Public School, Five Islands Public School and Lake Macquarie High School. Woodrising has a childcare centre as does Bolton Point. Toronto has one high school, two primary schools and a number of early childhood facilities.

There are aged care facilities at Booragul, Bolton Point and Teralba. There are over 55's developments approved for Booragul and Marmong Point, all within the five Kilometre radius of Newstan and the rail line.

The concern is the increase of air pollution and thus the decrease in air quality. This concern is echoed by the State Member, Greg Piper MP; <http://www.gregpiper1.com/index.php/2013-09-26->

[00-50-59/air-pollution](#). And regardless of national standards and emission guidelines, it is important for the NSW Government and Centennial Coal acknowledge and act on the concerns of the residents of West Lake Macquarie and the government representatives that represent the area.

These concerns include 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, particularly 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 my 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.

The EIS in the main report recognises the significant risk of air quality emissions impacting on health (pg.214) and that Greenhouse Gases will contribute to anthropogenic climate change (pg.286).

Under the existing approval for Newstan, the train loading system is to be automated when export exceeds 3 Mtpa. I ask that this to stay as it is.

In regards to current concerns it is asked 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 and LMCC.

**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).

These requests keeps in mind the precautionary principle and inter-generational equity, where the health of residents particularly the young and elderly are taken into consideration and best practices are implemented for the good of not only City, its residents but for Centennials employees.

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 are 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*. This project has recognised several Key Threatening Processes listed in schedule 3 of TSC Act. They include Loss of hollow-bearing trees, removal of dead wood and dead trees, clearing of native vegetation and anthropogenic climate change (pg. 286)

**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. Centennial Coal state in their Environment and Community Policy:**  
***"Our Vision – To conduct our business in an efficient and environmentally responsible manner, that is compatible with the expectations of our shareholders, government, employees and the community.***

***Beliefs: Everyone has a responsibility for minimising impact to the environment. Environmental performance can always be improved."***

Approximately 20% of the local population of *T.juncea* will be removed, which is a significant impact and therefore must be offset. Offset ratios should be in accordance with the NSW Biobanking Guidelines. It is my understanding that the offsets proposed in the assessment are not actual offsets but mitigations which are not consistent the EPBC Act offset guidelines or NSW offsetting guidelines for significant impacts.

Under the existing Development Consent DA 73-11-98 and the proposed Project Application Area for the Newstan Extension of Mining Project the Logistics project is within its boundaries. It must be brought the attention of the DoP&I that State Forest and State Conservation Areas are within these

boundaries. Under these consents and leases, Centennial operate under Crown Land (Land and Property Management Authority).

It is my understanding that there are existing (Main West) and past workings under the State Forest and State Conservation Area. Main West workings presently are not economic or viable for Centennial due to the type of mining operations (Bord and Pillar) and for a number of geological faults. Should, Centennial resume mining in the area the same type of mining would recommence.

In line with Centennials own policies, Councils strategies and under precept of Ecological Sustainable Development and the it principles of the **precautionary principle, inter-generational equity and, conservation of biological diversity and ecological integrity** and Federal and state governments guidelines on offsetting, it is requested that Centennial Coal commence negotiations with the Land and Property Management Authority to secure land to facilitate the beginning of long waited Awaba Conservation Area. **I believe land that should begin the Awaba Conservation Area include properties DP755218, lots 88-93.** This land is Crown Land, is within the boundaries of Centennials consent and is adjacent to State Forest. It is my understanding that is also under or near the workings of the Main West site, where it is bord and pillar mining.

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

I will look forward to further consultation in regards to the piping of LT Creek and hope, as in the past, Centennial will continue with an open and accountable consultation process.

## **CONCLUSION**

While I understand the potential perceived economic gains in this project with employment and revenue, there are long term issues at hand that will not benefit from this project as it stands. I remind not only the DoP&I and Centennial Coal that coal is a finite resource and in the scheme of life has short term gains.

The environment and its future is a resource that if looked after correctly will have long lasting benefits not only for now but for generations to come. Governments, worldwide are recognising

this, as too is Lake Macquarie City Council. Without biodiversity and conservation the future is grim, not only for our native flora and fauna but for humanity. Ecological Sustainable Development in its highest form is paramount. Observing, respecting and undertaking the principles such as the precautionary principle, inter-generational equity and, conservation of biological diversity and ecological integrity are vital.

Air quality and greenhouse gases are also very important issues, as too is the health of not only the residents of west Lake Macquarie but of the whole city and beyond. If air quality and greenhouse gases affect humanity then there will be an effect on other species wellbeing and thus on biodiversity. It is paramount that Centennial Coal do everything in its power, while undertaking this project, exercise the precautionary principle and inter-generational equity. Regardless of how significant or insignificant Centennial Coal deems an effect or risk may be, they must act with the highest intentions to minimise any damage to the environment. Damage to the environment has an accumulative outcome. Centennial must reduce their ecological footprint further.

#### **RECOMMENDATIONS:**

- The automated train loading system is installed when exports exceed 3Mtpa.
- Coal wagons are covered.
- For parcels of crown land to be offset into the Awaba Conservation Area for the conservation and protection of biological diversity and ecological integrity, in particular DP 755218 – Lots 88-91.
- Offsets meet the guidelines of the EPBC Act and NSW Offsetting guidelines.
- For the Company to closely monitor and communicate their progress and findings to the CCC, LT Creek SNG, LMCC and OEI 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*.
- 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.

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

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