

Submission to assessment by NSW Dept Planning & Environment
of application by Centennial Airly Pty Ltd DA162/91MOD3
for an extension period for mining of coal at Airly near Capertee
beyond the expiry date of the current approval

1. The writers making this submission own a property at Airly Gap within the mine lease area and within the Mugii Murum-ban State Conservation Area.
2. We are in possession of the 1991 EIS for this development and the Supplementary Report to the EIS published on 5 October 1992.
3. If, as it has been claimed, this modification 3 proposal seeks to extend this old 1991 development consent, then we wish to comment on the following aspects of the 1991 EIS and the 1992 Supplementary Report and how the proposals therein may be expected to affect the future appearance and amenity of this area.
4. The 1991 and 1992 EIS Reports propose initial use mainly of the “continuous miners” method for “full extraction”, and reserve the right to make longer term use of the “long wall” mining method, either of which being expected to result in surface subsidence of about 1.8m. I am in possession of a conceptual plan dated Oct 2000 of the proposed operation provided by Alex Brown of the mine Managing and Planning Department. It clearly shows extensive long wall extraction areas. Irrespective of the method used, the proposal to achieve close to full extraction results is an expected subsidence of the order of 1.7-1.8 m.
5. In the 1992 Report, as an acknowledgement of and a concession to concerns about subsidence, a small though significant area was excluded from damage by use of only partial coal extraction to protect identified features known as “The Grotto”, “Hidden Valley”, and “Valley of the Kings”. Cliff lines higher than 20 m were also excluded.
6. In this report it was claimed that for other areas subject to full extraction “*the result of this subsidence will be that the surface above full extraction areas will subside by 1.7-1.8 m whilst the land form of the surface remains as at present with no change to drainage patterns....*”, and “*after subsidence the landform, hydrological regimes and associated floral assemblages will be nearly identical to that existing, just 1.7-1.8 m lower in absolute elevation*”.
7. We strongly refute this claim as a gross over simplification of the real situation. In 1993 I (Frank) had the opportunity to visit the Baal Bone Colliery just north of the Airly operation and saw the nature of the roof collapse behind the long wall miner and what it was doing to the surface above the mine. The first few metres of roof collapsed, but then cracking extended upwards with the creation of a lot of voids, and the cracking affects both surface drainage and surface movement very unevenly, particularly near cliff lines, valleys and

tall structures. There was very considerable damage done above the Baal Bone mine with many cracked cliffs and collapses, huge boulders rolling down into valleys smashing all in their path, and large cracks appearing in the valley surfaces across the roadway.

8. The method of “continuous mining” which also seeks total extraction involves “some differential movement” between mined and unmined areas with accompanying cracking. We would expect the results of this at the surface to be at least as severe as from long wall mining. So we would expect similar damage to be repeated at Airly in the Mugii Murum-ban SCA.
9. It was also claimed in the 1992 Report that *“within a few months of mining, subsidence will be complete and access restrictions can be lifted. Only small parts of the area will be subject to these advisory notices at any one time.”*
10. Again, from observation at Baal Bone and reports from other mine areas, we strongly refute this claim and believe that with the expected surface damage and instability most of this SCA will be rendered unsafe to the public for many years or decades, as well as permanently destroyed for future generations.
11. In agreement with many groups and the coal company itself, we regard this area as having high conservation value. We have studied much of the area of the SCA and mine lease and are of the opinion that there are vastly more features that need preserving besides the “Grotto”, “Valley of the Kings”, and “Hidden Valley” areas mentioned in the 1992 Supplementary Report. The whole areas of both Genowlan Mountain and Mt Airly are covered by “pagoda” and “beehive” formations, cliffs, caves and creek lines that have been largely responsible for the reservation of the Gardens of Stone National Park, and the Greater Blue Mountains World heritage Area.
12. As well as this natural heritage we have the remnants of the Airly oil shale mining era heritage site which also stand to be damaged or obliterated. Many if not most of the natural and human heritage features exist near cliff lines and vertical structures lower than 20 m, meaning that they will not be given particular protective treatment.
13. The Report states that *“cliff faces will be protected and it seems unlikely that other significant features of the plateau will be seriously disturbed.”* And *“when mining is complete the identified values will remain”*. This seriously ignores all features not specifically identified in advance, such as the many groups of pagodas, beehives, smaller cliffs, caves and canyons. The object appears only to preserve a superficial macro view of the landscape, ignoring the fate of most of the smaller formations.
14. In the 1992 Report it is stated that *“during all mining, and particularly during the initial mining phase, the cliff faces will be monitored for potential or possible disturbance by the mining operation.”* I would add *“or actual collapse”* to this monitor. But it would be much too late to be revising major mining methods if significant disturbance was found (as anticipated). The variation in

topography up there is so significant that vast areas could be found quite unsuitable for total extraction of coal resulting in a waste of the injection of large and expensive resources in the operation. A reversal of policy once approved would be expected to be strongly contested and resisted, and better avoided by more realistic planning approval at this earlier stage.

15. We refute the claim in the 1992 Report that *“the area has been previously significantly disturbed by coal and shale mining and associated infrastructure and residential development”*. Virtually all signs of infrastructure and habitation were removed in the early 1900s when they were relocated to Glen Davis. The little that remains is an interesting insight into earlier human heritage that has to be searched for to be uncovered. The mining operations themselves were underground and quite limited, doing no perceivable damage to the surface.
16. As land holders with a cottage within this mining lease we are also concerned about damage to our personal property, being in the valley between these two mountains where the surface to mine depth is much reduced, but not singled out for special protection.
17. To summarise, we believe that any “total extraction” method that predicts surface subsidence of the order of 1.7-1.8 m is totally unsuitable for this area, which will destroy the natural and human heritage features of the area and make it unattractive and unsafe for public access and enjoyment for many years to come. No damage to any of the rock formations such as cracking and tilting is acceptable. The SCA should become part of the adjacent Gardens Of Stone National Park and part of the World Heritage Area after mining ceases, and must be in as good condition as humanly possible.
18. We therefore request that any granting of an extension of this lease, or indeed in consideration of a new “big mine extension project SSD 12_5581” as foreshadowed in the current application must exclude the granting of any approval for methods that will allow significant subsidence over any of the area of this lease. Approval should only be granted for extraction with minimal predicted subsidence levels of no more than 125 mm, and associated tilt not exceeding 2.5 mm/m, and maximum strain of 2.0 mm/m. These must be monitored and adhered to.
19. Similarly the discharge of local stream waters into the adjacent national parks should also be monitored and managed to levels of pollution acceptable to a standard required of a World Heritage Area.

Frank and Wendy Wilkinson
37 Prince St
Glenbrook NSW 2773

8 July 2014