

“Reclaiming our Valley”

Hunter Communities Network

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Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Submission of Objection Drayton South Coal Project - SSD 6875

The Hunter Communities Network is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

The Drayton South Coal Project should not be approved for the following reasons:

1. The economic, social and environmental impacts have not been comprehensively and correctly assessed by the proponent, nor have they been adequately avoided, mitigated or offset.
2. The proposed expansion of the Drayton Mine has been refused twice. This smaller version will not lessen the impacts to any satisfactory level.

Economics:

3. The project has no economic credibility because the proponent has stated during previous planning processes that a smaller mine would not be viable.
4. The job numbers and economic multipliers used to justify the project are inflated. Anglo has already informed its workforce that there won't be 500 jobs available and many of them will be under contract at a lower rate.¹
5. The Hunter Research Foundation has advised the Muswellbrook and Singleton Councils and Chambers of Commerce that diversification away from dependence on mining will secure a more certain economic future for the region.
6. Communities in the Hunter region cannot plan for an ordered transition away from coal dependency while multinationals like Anglo ruthlessly use their workforce to be the

¹ <http://www.theherald.com.au/story/3126298/drayton-workers-lash-out-on-social-media-over-jobs-losses-poll/?cs=303>

public mouth pieces for the industry and wield undue influence with decision-makers by submitting incorrect information.

Social:

7. The land use conflicts in the Upper Hunter caused by opencut coal mining have not been resolved and this proposal is exacerbating the problems.
8. There is no security for local communities and agricultural based industries when mining proposals can continue to be resubmitted after being rejected.

Environmental:

9. The proposal has not acquired the relevant water licences. The access to water in the Hunter Regulated River is over allocated and will not supply all entitlements in an extreme dry weather event. This has not been assessed.
10. A sub-regional groundwater model including all mines and major water users in the vicinity is needed to properly assess spatial and temporal cumulative impacts to water resource and dependent ecosystem in the vicinity of the proposed project, as advised by the Independent Expert Science Committee
11. A comprehensive and independent assessment of the cumulative impact of all current final void approvals in the Upper Hunter is critical before this project can be determined
12. The proposal fails to recognize or assess the impacts of the removal of 151 ha of the newly listed critically endangered ecological community Central Hunter Valley Eucalypt Forest and Woodland Complex
13. The proposal will have significant impact on matters of national environmental significance listed for protection under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. These impacts have not been avoided, mitigated or offset
14. The proposed Biodiversity Offset Strategy does not meet the requirements of the *NSW Biodiversity Offset Policy for Major Projects*
15. The long term economic costs of the additional carbon released from the proposal has not been assessed

In conclusion Hunter Communities Network considers that the economic benefits of the proposal do not outweigh the significant social and environmental impacts.

The Drayton South Coal Project must be rejected as an unsustainable development that does not meet the principles of ecologically sustainable development as required under the *NSW Environmental Planning and Assessment Act 1979*.

Yours sincerely



Bev Smiles
Convenor