

Major Planning Assessments  
Department of Planning and Infrastructure  
GPO Box 39  
Sydney 2001

20 June, 2012

Dear Sir/Madam,

**Submission of Objection – Wallarah 2 Coal Project**

The Nature Conservation Council of NSW (NCC) welcomes the opportunity to comment on the Wallarah 2 Coal Project. NCC is the peak environment body in New South Wales, representing over 100 organisations across the state. We have long-standing experience in state environmental assessment and planning issues and are extremely concerned with this second proposal to develop the Wallarah 2 Coal Project in the Wyong local government area.

This project was refused in 2011 and most of the concerns raised in regard to the previous submission have not been remedied in this second application. The proponent has failed again to adequately address issues associated with the impact of the project on water quality, subsidence, and the ecological and heritage values of the area. The project also poses significant threats to the region's drinking-water catchment.

NCC objects to this development application on the following grounds.

**Water impacts**

If it proceeds, the Wallarah 2 Coal Project would undermine a catchment that supplies 53% of the Central Coast's water supply, upon which a population of 300,000 people depends. Any development that jeopardises this vital community resource should be rejected.

The project may also have a serious negative impact on the recently completed \$80 million Mardi-Mangrove pipeline, which relies on the sustainable supply of water from this water catchment to enable the transfer of water from this system to the Mangrove Dam for water banking. Any development that threatens the volume or quality of water from the catchment would compromise this substantial investment of public funds.

The project proponent, Kores, claims the existence of impervious layers between the surface and the mine seam water supply would ensure the water supply was not affected. However, the company has admitted in its own technical submissions that water will be lost at a rate of 2ml a

day for every square metre of mine surface area. This amounts to about 8 megalitres a day or 3000 megalitres a year.

Water loss may however be worse than the company's modelling predicts. Professor Bruce Hepplewhite (Appendix H, p258) has questioned many of the assumptions used in the geological modelling upon which water loss forecasts were based. The fact that the Kores submission is littered with uncertainties and questionable modelling must cast doubt on the value of the information provided by the proponent as a basis for decision making, especially when any miscalculation could have serious consequences for the Central Coast's water supply.

The Wyong Water Catchment is protected under a NSW statute proclaimed in 1950 (Gazette No.153 of the LGA 1919, 1950). Currently, the site water management is inadequate because almost all management plans are merely observational. Some of the monitoring plans are not due to be created until two years into the operational life of the mine.

### **Air quality and community impacts**

This proposed mine will be in the midst of new suburbs and will put the health of residents at risk. Short-term exposure to particulate pollution can lead to diminished lung function, damaged and inflamed lung tissue, increased mortality rates in children and young adults, aggravation of asthma symptoms, and heightened risk of cardiac arrhythmias, heart attacks and other cardiovascular issues. Kores has admitted in the EIS that these links exist. (Appendix M, p153)

The dust and noise from stockpiling and rail movements will affected the amenity of the established suburbs of Blue Haven and Wyee and settlements all along the rail corridor from Morisset through Cardiff and southern suburbs of Newcastle to the port. The EIS fails to adequately address how these impacts will be mitigated. Consequently, this project should be refused based on the health risks associated with air pollution from mining, stockpiling and transporting coal.

### **Subsidence**

Another risk to surrounding suburbs is subsidence. A total of 245 houses (Appendix H, p130), 755 rural building structures (Ibid. p179) and 420 farm dams (Ibid. p187) could suffer some degree of subsidence. It is estimated the hinterland of the valleys will subside 2.6 metres; Little Jilliby Jilliby Creek at the southern end is predicted to fall 2 metres; and the main artery into the Jilliby/Dooralong Valley, Jilliby Road, is destined to subside 1.75 metres in places. These valleys already flood regularly. The potential subsidence from the proposed mining activities risks leaving residents even more isolated during heavy rainfall events.

### **Threatened species**

The proposed mine will have a significant adverse impact on native plants and animals in the region. Thirty-seven threatened and migratory fauna species and six vulnerable or endangered flora species are recorded within the project site. These species are protected under state and federal legislation. Furthermore, 19 species of avian migratory waders in the area are also protected under the *Environmental Protection and Biodiversity Conservation Act* by virtue of

binding agreements with China (CAMBA), Japan (JAMBA) and South Korea (ROKAMBA). There are also within the proposed mining area that are flora species listed as threatened and local fauna species listed as endangered under the Act. The key threats to these species include land clearing, change in habitat due to subsidence and alteration of water flow, wetlands and floodplains, all of which are likely effects of this project.

While the site is located wholly within the Tuggerah Lakes Basin, the extraction area lies in the Jilliby Jilliby Creek catchment. The mine and rail link will have an impact on Crown Land, land owned by the Darkinjung Aboriginal Land Council, protected species habitat and historical and Aboriginal cultural heritage sites.

### **Climate change**

The five million tonnes of export-grade thermal coal per annum that the proponent intends to extract contributes to NSW's total carbon emissions and is in conflict with state and federal programs to reduce our contribution to global climate change.

The argument for continued coal-fired electricity in comparison with the long-term investment in renewable energy sources has not been adequately investigated. The government should perform a cost-benefit comparison of investing the equivalent amount in renewable energy sources.

### **Failure to address previous concerns**

The Wallarah 2 Coal Project application has been refused once for failing to adequately address issues of water quality, ecological, subsidence and heritage impacts. There have not been any substantial changes to this second proposal and Kores has again failed to meet the Director-General's Requirements adequately.

### **Conclusion**

This proposal has the potential to cause long-term damage to the water, threatened species, and the health of people in the surrounding region. This proposal does not benefit the Central Coast, with the coal being mined mainly for export to South Korea. Due to threats to water, wildlife and the community it is irresponsible to develop the Wallarah 2 coal project and we urge the NSW government to reject the proposal.

Yours sincerely,

Kate Smolski  
Campaigns Director