

31st August 2016

Email to: information@planning.nsw.gov.au

The Director, Planning Services
Department of Planning and Environment
GPO Box 39 SYDNEY 2001

Subject: Wallarah 2 amended Development Application (DA), number SSD 4974

We write to object to the Wallarah 2 Coal Project SSD 4974 Amended Development Application, and any further progression of the mine proposal itself.

POINTS OF OBJECTION

Water Catchment

Wyang Water Catchment is protected under a proclaimed NSW Statute in 1950. The water systems of the Dooralong and Yarralong Valleys account for 50% of the water catchment for the entire Central Coast.

“The project predicts risk of reduced availability of water for the Central Coast Water Supply” according to the PAC wherein they... ” recommended there should be no net impact on potential catchment yield”.

The Central Coast water catchment supply in the Wyong valleys is at real risk of destruction due to massive subsidence and loss of potable water to the mine area below.

Subsidence

The extent of predicted subsidence is staggering (over 1000mm on average - 245 homes, 420 dams, 755 farm structures) – this item of subsidence alone brings too many risks for the local community and the local environment. Too many remediation strategies will need to be devised at the emotional and monetary cost of the local community and tax payers.

The study area is crisscrossed with rivulets, dams, ponds, bogs, wetland and rivers, most are tributaries to the Jilliby Jilliby Creek and Wyong Creek. The risk to incur any subsidence underneath these water resources is far greater than what the Central Coast can take, and the predicted water loss is far greater than the recharge capacity or the Jilliby Jilliby Creek river flow. The Central Coast is in constant need for clean drinking water. Risking pollution by gases or shortages due to seepage is not a risk we want our community to bear.

The alluvial valleys are fertile because of ground and surface water storages. Many businesses, farms, families depend on these natural passive water storages, including fire fighting brigades. Risking loosing or damaging these water resources because of this Project is not a risk that we want to take for the sustainability of our own family land and our local community. We already have climate change to worry about and are investing in our own storage of water. We don't want to see natural passive water storages nor our man-made water resources drain any single drop of water to mining.

The woeful performance of the Mine Subsidence Board in refusing the vast majority of claims Statewide for subsidence year in year out does not protect residents as is claimed in the application.

Flooding

Massive subsidence figures represented in the proponents EIS affect 245 homes and their infrastructure, 86 of which are destined to suffer a metre or more drop right up to 2.3 metres and the valley floor suffering subsidence up to 1.8 metres fall right up to 2.6 metres near the Jilliby Conservation Area provokes "inevitable uncertainty concerning subsidence predictions" as a PAC principal finding.

The regular flooding of the Jilliby Valley means that this proposal condemns the area to degradation and to long periods of separation from facilities and emergency services.

330 kV Transmission Lines

We are greatly concerned with Wallarah 2's opinion that Transgrid should reinforce the footings of the tension towers as means to avoid coal sterilisation. The work required to replace those towers with other subsidence-proof tower (should they exist) as suggested by Wallarah 2 on page 100 of Appendix H will have enormous negative collateral impacts which are not assessed in the EIA. We cannot therefore promote this Project for these reasons as Wallarah 2 is not amiable to coal sterilisation, and is privileging profit over common-sense.

Costs/Benefits

Page 85 of the ADA states that the royalties to the State over the proposed and improbable 28 years life of the mine is \$200 Million which equates to just over \$7 million per annum. With falling coal prices and Government concessional rebates this figure is inflated. Taking into account the costs of repair and rehabilitation, particularly in the Jilliby Vallley water catchment and Hue Hue subdivisions following subsidence, easily negates the benefits to the State and local authorities. By adding the long-term cost to public health and to greater airborne diseases in the population it begins to look like a costly enterprise for the public purse.

Bush Fires

The valleys are naturally wet. All the time. The forested hills are naturally wet too. Remnants of rainforest or rainforest regrowth are strong, healthy and thriving with life (fauna & flora) because they are wet. All the time. Our floodplains are wet. All the time. This humidity is possible thanks to a healthy recharge area from the forested hills down to the aquifers, ground storage and surface water storage. We have been advised by members of the local area that this humidity is a major damper to bush fires and this has been confirmed by the SCA Park Management representative. This protects assets both public and private, this protects wildlife and this sustains the natural features of our coastal hinterland (pastures, farmland, estuary, etc). The EIS does not take into account the amount of work and resources the rural fire brigades will need to undertake when bush fires become more prevalent. This point is not to suggest mining will cause bush fires. It will however gradually rob the ground of its natural moisture. And with climate change becoming more apparent every season, we need to increase our chances to protect our land and our assets. Thus we cannot promote this Project as it will undermine our land and our community's bush fire safety.

Pollution by dust, noise and emissions

Dust still remains a real issue for health in the Blue Haven and Wye precincts despite partial coverage of infrastructure. There is no attempt to cover coal wagons, which will travel through the southern suburbs to Newcastle affecting all those communities of southern Lake Macquarie and Newcastle as has been demonstrated in the Hunter to Port line. There has been great concern about the mapping of coal dust and the lack of authorities to control those emissions. This project exacerbates the problem adding to that congestion toward the Newcastle terminal. The added times of daily rail crossing closures at Adamstown and Islington need to be disclosed to the Newcastle community.

Pm10 emissions from the site are conservative as usual and do not take into account the changing nature of intense wind and storm events in the recent years. Blue Haven and Wye townships are now as close as 200 and 400 metres respectively from the new proposal bringing even greater problems for families in the area for both constant dust and noise 24 h/per day. There are many schools, pre-schools and establishments within 5 kms of the facility and they will suffer from emissions from the site.

Please refer back to the submission by Dr.Peter Lewis, Area Director of Public Health for North Sydney and the Central Coast wherein he outlines greater risks to children and health sufferers in this region should this project be approved.

Noise exceedences are admitted to for “residences to the north of Bushells Ridge Road at Wye” and general noise 24 h/per day for those living in Blue Haven and Wye areas are issue of concern.

Unresolved issue from the EIS 2014

Employment

Pages 86 and 87 state job creation beginning with 79 through to direct and indirect job figures in year 2 of 1,111 jobs. This application states very clearly that this assessment is only looking at this Amendment and not the whole Project yet the job figures are obviously being included for the whole project such as a larger ‘intersectoral’ linkages job quotation during construction of 1605 direct and indirect jobs.

Because the original rail spur is not being built and will be replaced by a conveyor system (essentially being the main thrust of this Amendment) does not create an additional 1605 jobs for the whole Project as configured above. As in the original EIS the job prospects are not defined and again highly inflated and misleading.

Risk / Reality

The real fact that the proponent KORES is withdrawing from overseas development due to massive debt ratios, as recently expressed in the Korean press tells, the community that future job prospects, development and most importantly the need for environmental repair, compensation and rehabilitation have little hope of being realised.

This Amendment should be rejected and the whole project put aside due to many areas of risk.

Yours faithfully,

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