



Hunter Environment Lobby Inc.

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

4th September 2016

Hunter Environment Lobby Inc wishes to lodge an objection to the Wallarah 2 Coal Project SSD 4974 Amended Development Application

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL has particular interest in water management issues in the Hunter Region and has held positions on the Hunter River Management Committee and on the Hunter and Paterson Environmental Water Advisory Group. HEL also has held a position on the Upper Hunter Air Quality Monitoring Network Advisory Committee in the past.

As a member of the Hunter Central Rivers Alliance of like-minded community and environmental groups, HEL feels it is amply qualified to comment on this project despite it being outside the Hunter Catchment zone. The cumulative impact of additional train movements and associated increase in dust emissions through Newcastle to the Port is a concern of Hunter residents.

The precarious balance of water quality and water supply in the Wyong Central Coast area is equally as important as here in the Hunter.

The issues of water quality and supply as well as subsidence issues are our main concern for this application for an amendment by the proponent Kores, a multi-national Korean company. This company, according to the Korean press has had liquidity problems in its business which seem fairly substantial, which gives HEL no confidence for the future of this project as a whole, and makes us nervous when looking at long term rehabilitation issues.

Kores should be considered as not fit and proper to conduct the project under the provisions of the Mining Act.

Rehabilitation issues occur with under ground as well as open cut mining – and once again water issues figure highly. Major disruption of aquifers deep in underground layers of the earth can often result in major incidents of subsidence that can have dangerous and costly outcomes for communities in a wide radius of the original development.

As well as water and subsidence issues, HEL notes that there are other serious issues that have been highlighted by the local community. One such issue is that of the contested economic benefits and job figures which seem to be inflated and quoted as being for this Amendment alone, whereas it seems only feasible for the whole project.

The other issue that many other community groups have ongoing concerns over are the seemingly inflated costs/benefits ratio as stated in the proponents application. The statement that the royalties to the NSW State coffers 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 seems inflated. Taking into account the costs of repair and rehabilitation, particularly in the Jilliby Valley water catchment and Hue Hue subdivisions following subsidence, this easily negates the benefits to the State and local authorities.

With the employment figures, this application states very clearly that this assessment is only looking at the numbers for employment in the 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.

Dust and Noise remain real issue for health in the Blue Haven and Wyee 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.

We believe Pm10 emissions from the site are conservative and do not take into account the changing nature of intense wind and storm events in the recent years. BlueHaven and Wyee 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. We ask that you 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 Wyee” and general noise 24 h/per day for those living in BlueHaven and Wyee areas are issues of concern.

Unresolved issue from the EIS 2014

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 could condemn the area to degradation and to long periods of separation from facilities and emergency services with a subsidence event.

Some community groups feel that the role of the Mine Subsidence Board in refusing many claims Statewide for subsidence events does not auger well for continued protection of residents.

Overall the project's predicted risk of reduced availability of water for the Central Coast Water Supply is too great, according to the PAC Executive Summary, 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. Hunter Environment Lobby maintains that this Amendment should be rejected as well as putting aside the original proposal due to unacceptable risk to the health of environment and local communities along the coal chain from the development.

Sincerely,

A handwritten signature in cursive script that reads "Jan Davis".

Jan Davis
President Hunter Environment Lobby Inc.