

Community Environment Network Inc.

An alliance of community and environment groups from Lake Macquarie, Wyong and Gosford.

2 September 2016

The Director
Planning Services
Dept of Planning and Environment
GPO Box 39
SYDNEY 2001
email: information@planning.nsw.gov.au

CEN Submission – SSD 4974 Amended DA WALLARAH 2 COAL PROJECT

Dear Sir / Madam,

The Community Environment Network (CEN) is an alliance of community and environment groups from Gosford, Wyong and Lake Macquarie. CEN is a not-for-profit community based organization that works for ecologically sustainable development and against threats to it.

<u>CEN objects to the Amended Development Application (ADA) and to any furthering of the Wallarah2</u>
<u>Project</u> on the basis of environmental destruction, loss of fresh water supplies, subsidence, threats to human health over the long term and climate change.

We highlight the following concerns:

1. Unacceptable Risk:

The fact that the resources arms of the South Korean Government are restructuring and concentrating on energy systems other than coal means that this coal project is not likely to extend for a great many years but the damage that will be caused in the process is not likely to be repaired or compensated for due to lack of funds in the future. It is alarming to know that the actual proponent, Wyong Coal Pty Ltd, is in fact a \$400 paid up company and therefore under law is limited to the value of its assets. Any claim in the future for reparation or compensation is not likely to be realised under law.

2. Costs/Benefits:

Royalties to be paid over the supposed 28 years of operation only equate to \$7 million a year. With falling coal prices and Government concessional rebates, we believe that this figure is inflated. Taking into account the costs of repair and rehabilitation, particularly in the Jilliby valley water catchment and Hue Hue subdivisions following subsidence, this would negate the benefits to the State and local authorities. By adding the long term costs to public health and to greater airborne diseases in the population, we believe the long terms costs far outweigh any economic benefits..

3. Dust, Health and Noise

Coal dust is a problem for the health of people 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 the communities along the line through Lake Macquarie and Newcastle which has happened on the Hunter to Port line. The community based study of coal trains (*Higginbottom et.al*) recently showed alarming PM10 depositions particularly from empty wagons.

Blue Haven and Wyee communities are within 200 and 400 metres respectively from the new conveyor system and near the 9 storey high loader on the rail line that will operate 24 hours per day, seven days a week. These communities have a very high child population and include schools and pre-schools which will be exposed to this risk.

Please refer back to the submissions (2010 and 2013) by Dr.Peter Lewis, former Area Director for Public Health, that showed great concern about morbidity and trips to the doctor for many children and those already suffering from respiratory disease. Planning should recognise that this development is disastrous for long term public health and on this basis alone should reject the proposal.

Noise exceedences are admitted to for "residences to the north of Bushells Ridge Road at Wyee" but will be problematic for all those living in the nearby communities. Health impacts such as insomnia and depression are associated with constant noise and should be taken into account more seriously than the proponent demonstrates.

4. Salty Brine Storage

5,280 cubic metres of semi solid brine per annum is destined to be stored underground for at least the first 14 years. OEH has shown great concern about the lack of detail and effort by the proponent to explain details of this scenario and also the long term disposal of saline water into the Wallarah Creek system and possible overflows into Budgewoi Lake. The proponent needs to fully explain how the underground aquifers will not be contaminated and how the Wallarah Creek system will not be compromised over the life of the mine. The uncertainty about rehabilitation as expressed earlier is pertinent to this aspect of the proposal.

5. Water Loss and Subsidence

Much has been put to the earlier Planning Assessment Commissions about the loss of potable water in the catchment valleys and also the subsidence of 245 homes and infrastructure. Please refer to the many submissions and that by Professor Philip Pells whose lengthy submission to the 2010 PAC explains the many risks involved in mining below the fresh water aquifers. CEN reiterates that any threat to fresh water supplies of the Central Coast should not be considered. The precautionary principle should apply to this development and the worldwide standard of Ecologically Sustainable Development, which is a core principle of CEN, should also be applied, and on that basis this ADA and the development of Wallarah 2 should be clearly rejected.

6. Climate Change

The world governing body, United Nations, and the vast majority of countries have agreed that coal is linked with the rapidly changing climate. Many major financing bodies now reject loaning to any country funds that will allow expansion of the coal industry. Indeed as we stated South Korea is redirecting its efforts in energy away from coal burning as is China and others. This development is not compatible with this change in international efforts and so again this project should be rejected outright.

We urge you to consider the issues raised in our submission and those of others who have opposed Wallarah 2 over the years. Our climate future is our most precious ideal and this is now the most fundamental issue we all face.

We request that this ADA be rejected.

Yours faithfully

Jane Smith

CEO, Community Environment Network