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Director
Mining Projects
Development Assessment Systems & Approvals
Dept. Planning & Infrastructure
GPO Box 39
SYDNEY 2001

Dear Sir

Re: Proposed Wallarah 2 Coal Project – Application No. SSD – 4974
Applicant – Wyong Areas Coal Joint Venture

I wish to lodge my objection to the abovementioned proposed coal mine in the Dooralong and Yarramalong valleys. I am a resident of the Dooralong Valley and our family has been here for 25 years. I urge you to recommend that the application for the above long wall coal mining project be refused. This proposed coal mine by Wyong Areas Coal Joint Venture (Kores) is in the water catchment for the Central Coast – taking in both Wyong and Gosford local government areas. This project has the potential to severely impact this region.

Director-General's Requirements

There are a number of areas of non compliance. It would appear that this report, whilst very lengthy, has not addressed a number of issues and the applicant has not made any substantial changes from their previous application which was refused in March 2011 by the previous NSW State Government.

Subsidence

Appendix H – Subsidence Predictions and Impact Assessments

The applicant details in this appendix the expected subsidence that will occur with the mine. Longwall coal mining always results in subsidence which has severe impacts on ground water, river systems, infrastructure, houses, farm dams, roads, etc. How can any government approve a mine which has the potential to impact so much?

5.3.1. - Predictions for the Streams

Table 5.2 details the predicted subsidence for the creeks varying between 175mm and 2600mm. In 5.3.2. – *Impact Assessments for the Streams* – indicate ‘a number of potential impacts...’ including ‘changes to stream alignment; fracturing of the bedrock in the floors of the valleys; changes to water quality; impacts on terrestrial and aquatic flora and fauna.’ Are we expected to accept this? Jilliby Jilliby Creek is predicted to subside by up to 1500mm – this creek, (including the surrounding groundwater), is an important component of the water catchment for (to remind you again) of the Central Coast.

Very recent and current history of long wall coal mining in water catchment areas in NSW, demonstrates very clearly that damage to the river systems cannot be repaired. The water has simply disappeared down the fractures in the river beds and any assurances by the applicant that either the water is safe or that they can repair any damage is simply not supported in practice by the mining companies. This is too great a risk and the precautionary principle should be applied.

5.9.1. Predictions for the Local Roads

The Dooralong Valley has two main access roads, viz; Dickson Road and Jilliby/Dooralong Road. Table 5.7 indicates that subsidence in these two roads alone could be up to 1350mm and 1750mm respectively. This valley is subject to flooding and if the roads subside at the predicted levels, residents will be isolated for many days with possible flood damage to property, infrastructure, homes, roads and stock loss.

5.13. – Water Infrastructure.

The Mardi to Mangrove Creek Dam Pipeline has only been completed in the last couple of years at a cost of \$80 million – it was necessary infrastructure to secure water for the increasing population of the Central Coast. Figure 4 in the Main Report - *Existing Environment* - shows the pipeline falls within the project area. The applicant admits that ‘The Mardi to Mangrove Creek Dam pipeline touches the General Study Area...’ but that “it is unlikely, therefore, that the pipeline would experience any significant impacts...’. Any risk, however small, is too much – ‘unlikely’ is not very reassuring. Although most of the pipeline is not directly in the current project area, it does fall within the horizontal zone of subsidence.

5.22. Agriculture and Farm Lands

The applicant admits that ‘farming could be affected by changes in the surface water and groundwater regimes.....’. The report recommends ‘that the WACJV develop management strategies, in consultation with the owners, to manage the potential for impacts to these agricultural businesses’. This is totally unnecessary - farmland, just like water, should be protected. These valleys, with their rich alluvial soils, have had a long history of productive farming and the proximity to the Sydney basin for future food production should ensure its protection.

Ground and Surface Water

The Dooralong and Yarramalong valleys represent approximately 53% of the drinking water supply for the entire Central Coast – a current population of more than 300,000 and increasing rapidly. These valleys were proclaimed as a water catchment district in 1950, gazette number 153 of the Local Government Act 1919 – this was put in place to protect the water catchment for current and future generations. This government proclamation should be adhered to. This proposed longwall coal mine will put this water catchment in jeopardy and in contravention to the protection measures put in place in 1950.

The water catchment, made up of various streams, creeks and rivers, is primarily (approximately 68%) fed from underground aquifers. Jilliby Jilliby Creek falls within the proposed project area as well as an extensive system of groundwater. It is naive to believe that these water systems do not contribute to the overall water catchment supply.

The applicant has not carried out extensive water monitoring – rather they have extrapolated information from the northern and southern coalfields. How can this be considered extensive? Their admission to a loss of water of 2ml per day per square metre, extrapolates over the whole mine area to approximately 8 megalitres per day or approximately 3000 megalitres each year – more than can be naturally replaced. This will mean a loss of water for the water catchment.

Health

The applicant admits on Page xi of the Executive Summary (Health Risk) that there will be an increase in mortality - 1 in 100,000 - a small risk according to the report. Even one death is too many and consideration needs to be given to the other residents who would be severely affected by fine particulate dust which causes respiratory problems and aggravates those who already are suffering from asthma and other respiratory conditions. Both the cost to the State Government through hospital admissions and the cost to the workplace through absenteeism need to be seriously considered.

Ecological

Within the project area there are 19 migratory waders, protected by international treaty obligations, 2 species of threatened flora and 2 threatened and endangered species of fauna. The applicant in Appendix H admits that there will be changes to alter water quality and that there will be impacts on terrestrial and aquatic flora and fauna. (On page xiii of the Executive Summary it is noted that there are '29 threatened and eight migratory fauna species'.)

In 2004 the Jilliby Jilliby Creek was declared one of the most pristine in New South Wales. This report was prepared by River Care, in association with Hunter-Central Rivers Catchment Management Authority, National Heritage Trust and Department of Infrastructure, Planning and Natural Resources. Concerns were also raised in this report of the potential damage from

longwall coal mining under the creek system and within the catchment area and the EIS states that there will indeed, be negative impacts on the creek/river systems.

Soils and Land Capability & Agriculture

There are a number of inadequacies and contradictions in these assessments and a number of areas do not meet the Director General's Requirements. Some of these are:-

- Insufficient baseline data collected
- Survey methodology inadequate
- Soil survey assessment inadequate
- Soil mapping not consistent with reference material – the soil map is incorrect
- Land capability mapping incorrect
- Agricultural suitability mapping incorrect

Conclusions drawn from incorrect and insufficient data is invalid and therefore any assumptions made by the applicant are meaningless.

The report also does not address rehabilitation of the mine site – another requirement of the Director General.

Conclusion

In 2011, the previous Minister for Planning rejected the Wallarah 2 mine proposal and this Government should do the same, putting in place appropriate legislation (as was promised in the lead up to the last State election) to stop this current and any future mining proposals.

These valleys are a substantial portion of the water catchment for the entire area of the Central Coast which has a rapidly expanding population. This is a proclaimed water catchment and as such should be protected from any possible threat.

This particular application does not cover the whole of the proclaimed mine subsidence area – a point which I believe should be seriously considered. How many mining companies are refused extensions to their lease? I would suggest that it is either none or a minority, so this current application needs to be considered as a whole, not just a part.

Water is the single most important natural resource and it should be protected. Water is essential for all life. The water supply of the Central Coast should not be put at risk for the short term financial gain of a mining company and the Government.

Longwall coal mining has many negative consequences with impacts on water (both surface and groundwater), health, flora and fauna, environmental degradation and damage caused by subsidence to infrastructure, homes, farm dams, roads, etc.

The water supply for this region should be protected for both the current and future generations. There should be no mining in any water catchment.

If this project is given the approval to proceed, then the NSW State Government is sending a very loud and clear message to the people on the Central Coast of NSW that the revenue from coal mining is more important than they are.

I urge you to reject this mine application and put in place appropriate measures to stop this and any future mining applications. The precautionary principle should be adopted.

Yours faithfully

Sandra Norman