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NSW 2422

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Director, Mining Projects
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Department of Planning & Infrastructure
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Dear Sir

ROCKY HILL COAL PROJECT – DEVELOPMENT APPLICATION SSD-5156

I oppose the Rocky Hill development application for an open cut coal mine.

I am disappointed that I find myself having to make a submission to this Rocky Hill EIS. It should never have got this far.

My wife, two young children and myself moved to Jacks Rd in 1997. We bought this 400 acre farm and have farmed here ever since (lot no's 21A and 21 B EJ & KJ Robinson)

Our back boundary is less than 1km to the mine boundary. Our house is 2km to the mine boundary.

If this mine is approved I will be spending 24/7 living and working with the dust noise and visual pollution of this mine. At least the mineworkers get to go home after their shift and get away from this mine.

Noise and Vibration

Infrasound and low frequency noise can travel great distances in quiet settings and in narrow enclosed valleys (temperature inversion in winter). It is possible that people living 10kms away may be impacted by this noise. It is unrealistic to use A-weighted measurements as this will rule out most low frequency noise. All noise measurements should be using C-weighted measurements to capture the full audio spectrum.

All houses occupied including houses owned by the mine company must be compensated for likely health damage that could occur. This also includes any blast fume mishaps.

Air quality

All occupied dwellings within the 5km radius of the mine should be within the air quality and greenhouse gas management plan for the mine. This area should be subjected to stringent air quality monitoring by independent experts who are employed to look after and advise on air quality issues.

Exceedance of air quality standards should be on a daily basis not on an annual basis. (ES-17)

It is hard to believe that the train Load-out Facility will not create dust and noise problems when a train carriage is filled with 10% wet coal from 100mms above the train carriage.

According to the EIS there will be no noise and no dust from train loading, I find this a farcical assumption.

All train carriages should be covered both loaded and unloaded to ensure the health and wellbeing of all people living along the rail corridor.

Visibility

My line of sight from the front door, main bedroom window, ensuite window, kitchen window, back door and all windows in the family living area will look directly at the mining area.

The visibility barriers will always be a visual reminder of an open cut coalmine operating inside these barriers and no amount of vegetation will decrease the visual impact of these barriers.

The western and northern visibility barriers which should be completed in the second year of operations will present intolerable visual pollution at our house and these barriers will be presented for the next 12 years.

The northern barrier and some of the western barrier will be substantially removed in year 12 so that the final coal can be removed. This is unacceptable on the grounds of visual pollution, noise and dust.

The visual and noise pollution while these barriers are being built will be unacceptable.

I am sure great efforts will be used to limit lighting and lighting glow in the area of the mine, these efforts will however be insufficient to rid us of the night time glow and pollution from this lighting therefore all mining and activities should cease after dark.

EIS states that only those familiar with the surrounding landscape will notice any landform changes, therefore all residents along Jacks Rd, the Thunderbolt and Avon Estates, Bucketts Way residents and the Forbesdale area will notice major changes to this landscape. The proposal will have a significant detrimental impact on the overall high quality scenery of the region.

Ground Water

As I am not a hydro geologist I can only say that with the advent of Rocky Hill and AGL's 110 coal seam gas wells and the extension plan of three new open cut pits at Stratford Coal Mine (5km upstream) the draw down of ground water which is used by the Avon River as a making stream will be severe. The Stratford cumulative ground water study suggests that there will be 140m draw down of the ground water level within the area of these three developments. I am very concerned that this will render my farming business unviable.

The sediment dams that are used to capture water from the visibility barriers are just going to be a disaster as far as pollution of the river and surrounding floodplain and of course my farming enterprise.

On page ES20 it states 'there would be no measurable impact within Waukivory Creek or the Avon River' however on page 4-187 'the proposal would decrease flows in the Avon River downstream of the mine area (to Oaky Creek a distance of 1.6km) by up to 1.7%.' this includes our farm area. This is not acceptable!

Surface Water

My farm relies on the Avon River as its major source of stock water. As this river is ephemeral any changes to flow rates will be unacceptable for my farming operation.

The visibility barriers are encroaching onto the Avon River flood plain therefore along with AGL's coal seam gas wells, which are also on the flood plain, and the conveyer structure across the flood plain will change the whole flooding regime. The effect this will have is unknown and no one is dealing with this problem!

Sediment laden mine water should not be released at any time into the Avon River.

Rocky Hill has now acquired 267 megalitres of water licenses on the Avon River, AGL is needing to acquire temporary licenses for 200 megalitres of river water for their exploration irrigation trail and are hinting at using irrigation as a way of getting rid of excess water when the gas field is approved. If these two water users try to access this amount of water from the river at times of low flow this river will cease to flow very quickly. I do not think these water allocations were ever intended to be used in industrial situations and this needs to be looked at by the department of water (State Water), as irrigation for agriculture will become extremely difficult.

The site water balance has confirmed that the proposal can operate as a "no discharge mine" ie no discharge of saline mine water. If this mine is approved this needs to be a condition on the mine. "No Discharge"

Land and Soil

The overburden will consist mainly of sodic soils, which results in increased chances of erosion and dispersion making the maintenance of the visibility barriers ongoing and problematic at best particularly in thunderstorm events. I don't know how Rocky Hill intends to vegetate the visibility barriers, as they are almost too steep to walk on let alone use any equipment on.

Transportation

Page 4-221 Jacks Rd

Jacks Rd is a local road managed by council and provides access from Bucketts Way to both Thunderbolt and Avon River Estates and 7 privately own rural residential properties.' We live on 400 acres at 124 Jacks Rd, we are not 'rural residential' we are a working farm with direct access off Jacks Rd, yet this is not mentioned in the EIS.

Our Council Rate Notice defines us as 'Farm Land' not Rural residential as we are a working farm with our income derived from beef farming.

There will be between 186 and 294 light vehicles per day and 4 to 16 heavy trucks per day traveling directly past our front gate.

With the increase of traffic on Jacks Rd we will be impacted both from the north, with traffic, and from the south and east by the mine itself.

Rocky Hill states, 'they will be using 3 semi trailer tanker loads of fuel per week during site establishment and construction phase increasing to approximately 10 tanker loads per week in years 5 and 6.' This amount of fuel being burnt less than 2.5kms from our home is an unacceptable health risk to my family and to the other 45 odd houses within the 2.5kms radius of the mine.

The Bucketts Way will never handle this, there is no divided road or passing areas, this road is travel by tourist, families, campers, and caravans. The road will disintegrate and be a danger to all.

Biodiversity

The biodiversity offset area on the hills of the Mograni Range to the east of the mine can under no circumstances be seen as a compatible landform to the valley floor, which will be used for the mining operation. Some other compatible land will need to be found as an offset area (Compatible being similar type of land.)

Socio-economic

There needs to be an establishment of a charitable trust fund based on 1% of the cost per ton of coal. This payment option at 1% of the coal price should be maintained through out the mining period.

Under no circumstances should the aero club and Gloucester Airstrip be allowed to close down due to mining activities. The Gloucester community uses these facilities on a regular basis, if the mine is given consent Rocky Hill will need to find and build a new airstrip and facilities.

The monetary benefits going to the local community are in direct relationship to the 75% of employees living locally. This will never happen as it does not happen in other mining areas. Most employees will work on a drive in drive out basis. This living locally for Stratford mine only achieves about 30-40% living within the 2422 postcode.

Health

I have been led to believe from my reading that anyone living within 5 km will suffer diminished health. It is stated that coal pollutants affect all major body organ systems and contribute to four of the five leading causes of death (heart disease, cancer, stroke and chronic lower respiratory disease) Therefore on health grounds alone this mine is far to close to the Gloucester township, rural residential areas, estates and my house and farm. My house is 2km from the closest area of disturbance and 2.5km from the closest open cut pit.

This mining proposal puts at least 50 households within 2.5km of this development. 85% of Gloucester residents stated that they don't want this development.

Data collected (noise and dust) averaged, over annual periods, are meaningless; these periods need to be of 24 hours or less duration.

It is a well known fact that PM2.5 levels will increase significantly by diesel emissions from mining vehicles and from generators for coal seam gas well pumps. The world health organization recognizes diesel as a class 1 carcinogen. The Health Risk Assessment states "the potential health risks of increased levels of PM2.5 and NO2 are negligible or acceptable" I ask acceptable to whom? We live 2km from the mine area.

After reading in the Newcastle herald of the community dust-monitoring program we now all realize that the previous years of monitoring by the coal industry, their consultants and regulatory bodies has been appalling. We must have independent community supervised monitoring programs for dust, noise, lighting and mental health.

If this proposal is allowed to proceed all houses within 5km relying on water tanks for domestic use should have water filters installed and tank cleaning on a yearly basis to offset the greater levels of dust and pollutants in the air that this mine will produce.

Operating Hours

Pre start check start at 6am Mondays to Saturdays public holidays excluded. This is far too early particularly in winter and no activities should take place before 7am

All mining operations should be restricted to between 7am and 6pm Monday to Friday, Saturday 7am to 12 noon. To ensure that we have some quality of life left.

These hours need to include all operation of the mine including repairs and maintenance, processing, rehabilitation work, train loading and conveyer operations.

Blasting

Blasting should be notified 24hrs in advance to all households that are within the 5 km boundary of the mine site. All households within this 5km boundary will need to have structural integrity checks (at Rocky Hill's expense) done prior to the start of mining and on a yearly basis from then on to make sure houses have not been devalued even further from mining activities. All results of structural surveys should be on public record and lodged with the council.

If the government will not put a stop to this mine we will need to be able to sell and receive a fair price for our farm. We are in our late 50 and early 60's and will not be physically capable of farming for the duration of this mine life (21 years). Therefore our property should be put onto a forced acquisition list, as I feel this mine, if it goes ahead, will interrupt my life and business and will be very detrimental to my health both physically and mentally.

I fully support the submissions of both Gloucester Shire Council and GRIP (Gloucester Residents in Partnership).

I have made no reportable political donations.

Yours truly,

Edward Robinson