

Director,
Mining Projects Development Assessment Systems & Approvals
Department of Planning & Infrastructure
GPO Box 39 SYDNEY NSW 2001

Dear Sir
ROCKY HILL COAL PROJECT – DEVELOPMENT APPLICATION SSD-5156

Dear Sir,

We object to the Rocky Hill mine proceeding.

Manning Clean Water Action Group Inc as an organization concerned about the impacts of mining and Coal Seam gas extraction is deeply concerned about and opposes the Rocky Hill Coal Mine Project.

It is our submission that the Rocky Hill Coal Mine project fails to meet the criteria expressed in the Environment Protection Act.

The objects of this Act are:

(a) to encourage:

(i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,

(ii) the promotion and co-ordination of the orderly and economic use and development of land,

(iii) the protection, provision and co-ordination of communication and utility services,

(iv) the provision of land for public purposes,

(v) the provision and co-ordination of community services and facilities, and

(vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and

(vii) ecologically sustainable development, and

(viii) the provision and maintenance of affordable housing, and

(b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and

(c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.

It is our submission that this mine will have negative impacts upon:

1. The surface and ground water of the Gloucester water catchment and consequent serious effects upon the Manning River.
2. Water quality generally and in particular for agriculture in this area.
3. The environment and ecology of the mine area and the Manning River catchment generally including loss of habitat, and endangering plant and animal species.
4. The health of the Gloucester community particularly children and the elderly together with psychological impacts.
5. Employment opportunities both for those seeking employment and those employers who seek to utilize local residents in their businesses.
6. Existing agricultural businesses including food production, dairying.
7. Tourism in an area noted for its pristine environment and attractive landscape.

We would seek to comment on various aspect though by no means all of the areas in which the mine proposal is seriously flawed as follows:

Water

The location of the proposed Rocky Hill mine is on the Avon River floodplain, and in the water catchment area of the Manning River which supplies drinking water to over 80,000 people. Flooding has occurred regularly in recent years and the potential for the contamination of the water for this catchment should not be placed at risk.

The mining operation will obviously irreversibly change the natural water systems in the area their quantity and quality. This is a mine of 4 open cut pits from 70 to 190 metres deep. A significant area of land will be disturbed and vegetation cleared. Various creeks and water courses will be affected. Overburden emplacements will be created and stockpile areas all of which will effect the natural systems and jeopardize the water catchment.

This in turn will adversely affect local and downstream water dependant vegetation, agriculture, fisheries, urban systems and potentially Taree Water Supply.

The following points are raised from more detailed surface and ground water assessments presented in submissions by Gloucester Council previously which in our submission apply equally to this proposal.

- The Gloucester Stroud Basin is fraught with difficulties because of the structural complexity of the geology and the relationships between the aquifers. This complexity is well known and groundwater modellers have to make huge oversimplifications about the nature and hydraulic properties of the strata.
- The degree of vertical connection between aquifers is an area of significant disagreement between groundwater consultants. Vertical connection is a critical issue in groundwater modeling. As well, no models that we are aware of have even tried to consider the effect of the extensive shearing and faulting.
- Clearly open-cuts up to 200 metres deep provide direct connection between aquifers to that depth.
- Streams are ephemeral. Critical conditions for say, riverine vegetation and vegetation accessing groundwater when there is no surface water, will occur during drought sequences both during a particular drought and between droughts and these are not assessed.
- For cumulative impacts due to the development of the AGL gas project and the Rocky Hill coal project, no information is provided on the quantity of water abstracted. Yet there are to be CSG Stage 1 production bores across the Stratford mining lease and the Rocky Hill proposed lease area contributing to a maximum drawdown in potentiometric head of up to 1,700 metres.

Proximity - The mine boundary will be situated 900metres from Forbesdale Residential Estate of 35 families. Those families will experience unacceptable levels of noise, dust, and traffic should this mine proceed as will others with less proximity to the mine.

Noise - Noise is a major concern for residents who live near coal mines. There is the noise of the mine workings, blasting, loading trains and infrasound which cause sleep disturbances and can lead to major health complaints. The Rocky Hill mine will cause high levels of noise for residents close to the mine but also unacceptable levels of noise for residents in Gloucester township itself.

Health - negative health impacts, which can result in serious illnesses, from the dust from open cut coal mines are well known. Most of Gloucester township (including the hospital and schools) falls within the acknowledged 5km health impact zone of the Rocky Hill mine - thus placing a large proportion of the population at risk. Those most affected by the health impacts are children, the old, the sick and the socially disadvantaged.

This is a mine the operation of which will initially run from 7am to 10pm Monday to Saturday and later to 4 am in the morning.

This mine is far too close to Gloucester, the Forbesdale Estate and surrounding areas of farms and lifestyle properties. Noise, mine lighting and coal dust from coal train movements and loading - potentially at night - is a great concern. Very fine coal dust is a critical issue.

Children's Health. The overwhelming medical evidence indicates that higher rates of asthma and other respiratory conditions occur in communities affected by mining. Coal dust leads to increases in the number of children suffering with asthma with

associated cost to the public purse and the community. Gloucester township, schools and hospital are all within a radius of the mine that will be affected.

Heavy machinery used in the mining operation also contributes to particulate exposure in the population.

It is not only the physical impacts that result from exposure to the mining operation but the psychological impacts that these operations can cause through noise and sleep disruption. These health impacts involve damage accumulating over time.

The federal senate enquiry into air quality noted with alarm there are no emission standards for off road diesel vehicles. They recommended a buffer zone around mines to protect populated areas and 'pollution monitoring should accurately capture population exposure for communities and homes proximate to pollution point sources'.

Employment - Companies in Gloucester are already experiencing the negative impacts of having a mine nearby. Mining will not necessarily attract employees from Gloucester. There will be significant part of the work force and likely the majority thereof that will be drive in drive out employees from elsewhere.

Tourism and the Gloucester Economy. Gloucester's economy currently relies on agriculture, tourism and retiree 'tree-changers', new light industry and community support services. Tourists and tree-changers are attracted to Gloucester because of its natural and agricultural beauty and peace. These industries will be damaged and jobs will be lost if the mine proceeds.

An open cut coal mine within 5km of Gloucester will have a major adverse impact on the visual amenity of the area. Tourism is currently worth over \$30M to the Gloucester economy. Any loss of the tourism dollar will inevitably result in loss of jobs and money flowing into the community.

Alternative land Use Currently the area enjoys a reputation for beef production, dairying and for horticultural producers all of which have contributed to the attractiveness of the area for tourism. Ongoing opportunities continue in the food production area due to climate, water resources, soils, and location to markets. These industries are sustainable in the long term whereas mining will adversely affect air quality, and cause water pollution, loss of habitat, noise, increased heavy traffic and landscape scarring. Approval of the mining development constitutes a short term exploitation of the land without considering the long term detriment to that land and industries which will provide the long term and sustainable benefits that the community.

Rehabilitation. The mine will permanently damage the water systems and the geology of the area and catchment. The mere fact of the mining operation and the removal and relocation of the waste must result in the presence of contaminants that will not be resolved by the cosmetic return of the leftover waste to the mine pit. If remediation does occur then it will take many many years for the land to be usable again.

No explanation has been given as to how a coal-dependent Gloucester will be restarted after the mines close - and at what cost.

Neither I nor Manning Clean Water Action Group Inc have made a reportable political donation.

Yours Faithfully
Manning Clean Water Action Group Inc

Per Paul Lewers