



# Hunter Environment Lobby Inc.

28/10/2013

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

## ROCKY HILL COAL PROJECT – DEVELOPMENT APPLICATION SSD-5156

Dear Sir

Hunter Environment Lobby is a regional environmental organisation that has been appointed by the NSW Government over the years to represent regional environmental concerns on diverse committees such as the Hunter River Management Committee to the present Upper Hunter Air Quality Management Group.

We have made submissions on most large development issues, ranging from coal mining to large scale residential developments, such as the proposed Huntlee Housing Development near Branxton in the mid Hunter.

On this occasion Hunter Environment Lobby writes to oppose the Gloucester Resources Ltd's development application for an open cut mine near the Gloucester township. We, like many others are concerned that there is proposed to be no real regulation of this industry. It is permitted to explore in closely settled areas with the clear intent to mine if generally porous, negotiable, 'reasonable' consent conditions can be agreed.

In Rocky Hill's case, it seems, there are real issues about GRL's conscience to curb its intrusion into this valley and equally government's readiness to acknowledge that Gloucester is worth protection. This is a situation that the Upper Hunter faced decades ago, and looking back communities can see what happens when rampant destruction of the environment is allowed to proceed unimpeded.

Historically, government has only recognised Gloucester's worth as a source of mineral and petroleum resources to be 'harvested' - regardless of community concerns. These concerns relate to personal health, children's health, environment, habitat, permanent damage to water and soil systems, and jeopardising the long term self sustaining industries that have generated naturally in this community.

In many respects Gloucester is already a very Significant State Development project. Different from GRL's short term damaging development with long term legacies, Gloucester is an ongoing project worth billions.

It relies on natural growth via internal wealth and wellbeing processes. If it were allowed to decide for itself on a coal future, it would reject it because a damaging hungry industry is the antithesis of the defining qualities of Gloucester.

Much is made of the economic value that GRL might bring to Gloucester. Expert reviews asserts that GRL projections are wildly optimistic, do not accommodate the full costs to Gloucester the State and Federally, have not taken into account full life cycle costs, nor the

acknowledged industry and community adjustment costs when mining finally and rapidly withdraws.

GRL, quite inappropriately, has also applied a multiplier which will miraculously deliver unheard of prosperity. They have not detailed the potential impact and reach of a two-tiered economy on Gloucester. Neither have they costed it. The fatal flaws of not costing developments can be seen by the recent Land and Environment Court case on the Warkworth extension bid.

GRL makes much of the employment opportunities for Gloucester. Opportunities are not jobs. The Gloucester experience is that mining jobs commonly are filled by drive-in-drive-out workers who spend very little of their money in Gloucester. These workers are drawn from the ready supply of qualified staff in the Hunter and from larger population centres along the coast.

The costs of present users of the land are not appropriately seen in this application, the models used for speculation of ongoing wealth creation have not been proven.

On the matter of noise, GRL will not state definitively when coal trains will be loaded - a process they project will take 90 minutes per train. Instead they argue that they cannot provide likely train loading times because they will have to fit in with ARTC operations. GRL needs to declare that there will be a curfew on rail operations. The airline industry can do it. So can GRL and ARTC. This is an area worthy of critical, community-biased, scrutiny by the Assessment Committee.

On Forbesdale Estate and surrounding area, within 2Km of the proposed mine, families enjoy a healthy and peaceful life. This will be lost by day. Their nights will consist of strong lights reflecting off airborne coal dust, the noises of various vehicles, coal being loaded on coal trains for 90 minutes per train and the noise of the coal conveyor as it fills the coal loader. All this will happen in a small valley every night of their lives. GRL has no answer for this.

On health grounds alone, this development must not be given permission to proceed. Dust of varying sizes, from PM 2.5's to over PM 10's has been shown to figure highly in cancers and cardiovascular disease. Asthma in children who have been exposed to these damaging episodes leads to shorter life spans.

The community of Gloucester can see no rational reason why Gloucester Vale should be permanently damaged for the comparatively small coal resource being sought - and the highly questionable economic benefit touted as flowing to the state and local economies.

Hunter Environment Lobby asks that this proposal does not proceed.

Yours faithfully,

Jan Davis

A handwritten signature in black ink, appearing to read 'Jan Davis', is written over a light blue rectangular background.

President Hunter Environment Lobby Inc.