

Barrie and Judy McCarthy
2 Clement Street
Gloucester 2422

23 / 10 / 2013

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

Dear Sir,

Submission to Proposed Rocky Hill Coal Project – SSD-5156

I wish to make a submission to the proposed Rocky Hill Coal project SSD-5156.

The following submission is provided on behalf of a number of concerned long-time residents of Gloucester who recognise the need for a balanced economy to provide our community with long term and sustainable prosperity. We acknowledge that the development of such a mine in the close confines of the town of Gloucester provides some challenges for regulators and planners, however we also see this proposal as being much more than the “traditional open cut coal mine” Having read the EIS and studied closely the proposal we recognise that this is a state of the art proposal that provides significant quite costly initiatives that aim to address resident and community amenity.

Firstly we would like to address the locality and some currently held misconceptions before later in this submission addressing some of the more positive impacts that will undoubtedly ensure that resident concerns about potential risks to amenity are addressed.

Locality Issues and Resident views Expressed

Much has been made of the land where the proposed mine is to be located and in many submissions and council files that land has been identified as high value agricultural land. In fact most of the land has over the last thirty years been broken up into hobby farms (small acre residential holdings), as it was not highly productive and recent stocking rates and landuse reflects that situation. Clearly landholders in that area have made decisions over a series of decades that indicate it is far from highly productive agricultural land. Only one landholder in that area had agriculture as their primary occupation and sole source of income and only two or maybe three landholders could be considered to be doing high level land improvement that led to reasonably high stocking rates. Adjacent to mine purchased land, another three farmers are conducting farming operations with high levels of soil

development. The vast majority however have been doing minimal improvement and running quite low volumes of livestock, which is a reflection of its actual commercial capacity. The Dairy in Airstrip Road conducted by Speldon Partnership certainly is very intensive with stocking rates but the land improvement and management strategy are the reason for that rather than underlying soil fertility issues. The majority of the land has high clay and sand levels and is not highly productive. To quote a former Fairbairn's Road fellow who was a very progressive farmer that conducted high levels of improvement works on small areas of his farm in that area. "I didn't realise how poor the land and soil types were until I sold and bought the land along Bowman Farm Road, there is just no comparison in raw land capability"

Unless land in this area is closely managed with introduced plant species, heavy herbicide management and regular topdressing with Lime, chicken litter or phosphate based fertilizers the stocking rates are below those reflected in the other areas in close proximity to Gloucester. The soil testing conducted by the Mine proponents and "the Gloucester Project" in assessment of potential farm sites, bears these issues out fairly conclusively and are documented for public consumption. Any comments to the contrary except for very small patches of soil are obviously quite erroneous or fabricated to mislead readers. The Speldon Dairy, the Robinson and Bignal properties do demonstrate an effective farming operation within this soil type, however the levels of soil development, cultivation and pasture improvement are very significant and beyond the scope of most small mixed farms hence their transfer to higher land value uses like small acre subdivision for lifestyle farming purposes.

It is interesting to note that this type of small acre lifestyle subdivisions in the Gloucester LGA now demonstrates greater volumes of land consumed and lost to agricultural production than mining does. It is also important to recognise that this change is commercially based as the economies of scale and the productive capacity of land move further apart and make it more difficult for small farms like those evident in this area to survive. This is not a Gloucester trend; however, this is a national trend that flows from the erosions of small farms terms of trade in the global market as noted by a range of recent investigations like the Productivity Commission report in to the Agricultural sector in 2005.

The writers of this submission recognise the important role that small acre lifestyle subdivisions have in small rural communities and appreciate the value that the residents bring, but we also recognise this style of development generally means lower stocking rates, higher weed burdens and less well managed and less productive operations. It is not defensible to misrepresent this land as high productivity agricultural land.

Another argument presented by a range of players is that the land proposed as part of this mining development has been identified as Scenic Protection in the Gloucester LEP 2000 and 2010 and as such should be preserved as that, based on clearly expressed community aspirations and desires. That is certainly correct, this land was identified as that; however it

is also important to note that both of those LEP's identify the western entry corridor from the south as the most critical for retention due to its high value view of the Bucketts Range which has an iconic view recognised both regionally and nationally. It is also recognised that this natural feature has significant indigenous ownership and historical identification. It is that same western view that the community has identified over the last two decades for protection and retention that Council has seen fit on two occasions to rezone despite the intent and desire clearly expressed on many occasions by the community, for short term commercial purposes. The land adjacent to the Gloucester Golf Club has been rezoned to allow the establishment of a high density residential subdivision despite a strong stance taken historically by previous councils refusing to budge and seeking to retain this important aesthetic amenity option.

The second rezoning was even more critical on land adjoining the town centre which is also flood prone to allow the development of a 2000 square metre supermarket. Although other land opportunities existed Council took the step to rezone land that has a very clear western vista capturing the Bucketts Range for many residents. It is perhaps a little bit of double standard for the same agency that not only approved but championed these two rezoning options despite community concerns (to seek and allow developers to attain commercial advantage from rezoning such land) to then stand on a soapbox to object to development in a similar zoned area, but accepted due to much of its existing land use as less important for protection than that which has recently been rezoned.

For a number of months there has been an orchestrated hate campaign around the project and its detail, however much of the strength of the argument against such a proposal is based on experiences in other mining regions and localities and has not taken account of the detail of this application which has only recently become available through the EIS Exhibition process. Much of this information being distributed appears to be distorted and does not appear to reflect the content of some aspects of the submission to the Minister seeking approval. It is the writers concern that these misrepresentations when repeated often enough can quickly become the accepted situation. Key issues noted by us are the distortion of proposed local employment strategy statistics and the commitment from truth developers to source products and services locally to support their business and its operations.

There has also been much conjecture about the potential impact that an approval and the development of another Coal mine might have on perceptions about Gloucester and the flow on result to the tourism sector. It is very easy to make judgements that the mining and tourism sector are incompatible and the perception and image of Gloucester will change for ever and that tourists seeking a clean green or natural experience will be lost as their views of the community colour their decisions about Gloucester as a tourism destination. On the surface that would seem a pretty reasonable assessment, however research would suggest that growth in the prevalence of coal mining in the Arcadia Valley in Queensland, the

Gunnedah / Narrabri Regions and even in older areas like Cessnock have actually not been shown to diminish the expectation of customers, the discretion about visits to the regions or their length of stay.

It is important to recognise that almost 60 % of overnights stays in Gloucester are business based, contractor's business reps or people visiting family members. They are not primarily tourism based customers. It should also be noted that aside from accommodation houses the vast majority of business numbers that actually are involved in adventure based tourism in the region are not undertaking activities with easy reach, line of sight or hearing or sight distance of any of the mines within the Gloucester Shire. In fact the vast majority of visitors that engage in adventure and camping based activities are located on the western side of Gloucester many kilometres from the potential mine site. Yes the marketing pitch of many of the businesses will need to be a little more creative and the doomsayers will need to commit to the best interests of the community by way of becoming more supportive of a constructive main stream message.

For a number of years there have been quotes of the tourism industry value to the Gloucester district as being 28 -30 million dollars. Although those figures are regularly referred to and fill many recent strategy and business development documents there has not to date been any clear demonstration of how that value is calculated given that many of the visitor stays in Gloucester are readily recognised as not being tourism related visitation. Even the most recent assessments done by Buccan Consulting and Economists at Large do not clearly enunciate how they support such an assessment of value.

Positive Aspects about Mine Operations

Over the last four decades the Gloucester community has absorbed a number of major industry restructures that have not only meant businesses have changed directions, but also a number of families have sought other employment opportunities and been forced to leave Gloucester. Decisions have been made by government and changes in terms of trade for many industry sectors which has seen significant timber industry, Dairy and manufacturing job losses in that time. This has led to a significant drain of young people from our community as they seek employment outside our community.

The changing dynamics of international competitiveness in agriculture continues to undermine our strongest historically important employment sector and although we see similar milk production volumes from our region due to increased performance the numbers of employees, cow numbers and dairy farm operations has been much reduced. That same trend is now occurring in the beef industry, and has been for almost two decades. We have seen through the last three census collections a decline in overall agricultural employee numbers of 145 or 30% reduction in the agricultural workforce in the last 20 years. In a similar way many of the small competitive niche agricultural production systems that have evolved in our region in the last 20 years have also declined their influence and despite a

recent drive for intensive horticulture production it is extremely difficult to see a decline or arrest in the numbers of agriculturally based employees within our region.

The challenge of global competitiveness and the Global Economic Crisis has also focussed attention on our very innovative manufacturing sector which despite the best efforts of many and some high exceptions been marked by a decline in both business and employee numbers in the last 15 years. Cheaper import commodities based around cheaper labour and utility costs are making Australian manufacturers less competitive and that is flowing through the Gloucester economy as well and although as we note there are 1 or 2 significant exceptions the trend is reductions in employment in this sector. These factors plus the introduction of a major and predatory supermarket chain into the local retail sector has created many employment challenges for Gloucester residents.

That is the key benefit that a proposal Like Rocky Hill Coal mine brings to Gloucester. It brings employment and it brings flow on benefits for a range of businesses that also have to adjust in scale and grow employment numbers to meet the service challenges presented by such a proposal. This project is quite different to many mining projects in that the proponents have clearly stated as part of the development proposal that they have a very strong commitment to the Gloucester community and have in fact:

- set some local employment benchmarks,
- have established goals in respect to training and staff development
- and have made considerable commitments in relation to engaging local contractors and service providers.

The mining industry in the past and again now has potential to provide Gloucester with some employment buffer options as we enter the final stages, we hope of agricultural rationalisation. We recognise that it is a national trend and not exclusive to Gloucester so recognise it is fundamental and likely permanent change in respect to long term employment numbers in that sector.

This type of project offers a range of employment opportunities that are reasonably high value but not necessarily highly skilled or require highly skilled Individuals in the roles. These are the types of employees that are being displaced by the changes in agriculture and are the ones who find it most challenging to attain alternative employment and are least likely to leave the community due to family bonds and lack of skills and qualifications.

The service sector will undoubtedly derive some benefits from the establishment of the mine and although there is much debate about the benefit to local business directly from the mine operation it is important to note that mining generally in regional communities leads to a ramping up of engineering capacity and thus wealth and employment options. In addition the roles will mean more young people and older residents have the capacity to stay in the community, retain dignity through full time employment and contribute to fabric

of the community through financial and social contributions. The recent reductions in employment and operational roles at Stratford Colliery have demonstrated what an impact this type of establishment has on local business through flow on services purchases.

It is estimated that the Stratford pit with its historical production figures led to almost 20 full-time contractor and supplier based roles in the Gloucester community. Gloucester Coal (now Yancoal) had a much less selective procurement procedure than is proposed by Gloucester Resources and so it is expected with more goods and services will be purchased locally and that those potential employment numbers could as a result of the project be expected to be quite a deal higher than the 20 that result for Gloucester Coal. These contractor roles also require a level of skills and abilities that mean training and staff development opportunities increase in volume and diversity, building a more capable workforce in the community.

The mine proposal is as already acknowledged by the writers to be quite close to the Gloucester community and key residential centre of Gloucester. The proponents propose a state of the art mining operation that seeks to address resident amenity by way of sound management, visibility matters and dust and odour control mechanisms. The proponents propose a number of measures including:

- an overland conveyor that will reduce heavy vehicle movements
- A pit design that will mean noise and dust transmission from the site will be significantly reduced
- A scenic protection barrier system that will ensure the vast majority of residents and visitors are not confronted by a traditional open cut pit view each day that the mine is in operation.
- We note that this is a quite unique proposal that takes account of the location, geography and soil types in the locality and seeks in all of its functions to secure resident amenity

Conclusion

We believe it is the Department's role to assess the mine operational aspects and ascertain:

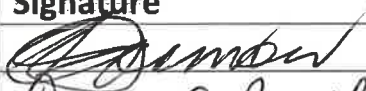
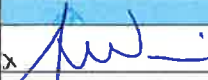
1. Whether the proposal has adequate safeguards for the community
2. Establish how those safeguards will be monitored and potential breaches addressed
3. And how and where operations might proceed to meet regulatory expectations

If the Department can't be assured that community security is assured and if systems are not adequate to ensure that occurs then clearly they have a role to intervene and reject any such proposal. However if the proposal as offered or as reviewed and amended does meet

governments rigorous review then we respectfully suggest that the mining operation can provide significant medium term economic stimulus for Gloucester and the surrounding region as well as much needed economic stimulus for the state's economy and should be approved with strict environmental management conditions thus ensure that resident amenity is maintained.

I am not required to make a reportable political donation declaration.

I have read the Department's privacy Statement and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments and any of my personal information in these documents, and possible supply to third parties such as state agencies, local government and the proponent. ~~Yes~~ / do not wish to have my personal information published with my submission

Name	Name of Business or Role	Date
Signature		
	FARMER	23.10.2013
Donald O. Reedford	RETIREE	24/10/2013
non - lead	Retired	24/10/13
J. McCarthy	Retired company Directors	24/10/13
B. McCarthy	Multiple ratepayers	
x J. Dickinson	Gloucester Variety 11 Church St Gloucester	24/10/13
x 	Service Station	24/10/13
Sue Wise.	Franchisee	
J. J. Saxon-Watson	Valves Motors. DIRECTOR	24/10/13



Barry Ryan OAM. FORMER
MAYOR 24/10/13

I am not required to make a reportable political donation declaration.

I have read the Department's privacy Statement and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments and any of my personal information in these documents, and possible supply to third parties such as state agencies, local government and the proponent. I do / do not wish to have my personal information published with my submission

Name	Name of Business or Role	Date
Signature <i>TB Han</i>		<i>24.10.13</i>
<i>1950-2010</i>	<i>Living and cattle farming</i>	
	<i>1950-2010</i>	<i>11/8/2011</i>
<i>TREVON HANN'S</i>	<i>TREVON HANN'S CONTRACTING Pty Ltd</i>	<i>24.10.13</i>
<i>TB Han</i>	<i>DIRECTOR</i>	<i>TB Han</i>
<i>DENVER WEBB</i>	<i>RETIRED STOCK & STATION AGENT & CATTLE FARMER</i>	<i>24.10.13</i>
<i>Edmundson</i>		
<i>Vivien Webber</i>	<i>Civil Marriage Celebrant</i>	<i>25.10.13</i>
<i>V. Webber</i>		