

Edward Robinson
124 Jacks Road
Gloucester
NSW 2422

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Director – Resource Assessments Planning Services
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Sir

Submission for the Rocky Hill Coal Project – Application No SSD-5156
Stratford Coal Extension Project – Application No SSD - 4966 MOD1

I oppose the Rocky Hill Coal Project together with the Stratford Mine Modification.

I am disappointed that I find myself having to make another submission to this Rocky Hill EIS almost 3 years later. It should have been rejected at the first EIS. I am disappointed to find out that the planning department has rejected this proposal twice yet it still exists.

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 312 and DP 777579 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 now be spending 15hrs a day living with the dust, noise, health implications and visual pollution that this mine will produce. At least the mineworkers get to go home after their shift and get away from this mine.

Noise and Vibration

Again I am disappointed that the EPA is trying to rewrite the industrial noise policy (INP) to weaken the noise requirements of secondary industries and mining. Using studies out of the UK to determine noise policy in Australia is absolutely ridiculous, why are we not producing our own studies?

Infrasound and low frequency noise can travel great distances in quiet settings and in narrow enclosed valleys (temperature inversion, ect). 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 should be using C-weighted measurements to capture the full audio spectrum.

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.

Excedence of air quality standards should be on a daily basis not on an annual basis.

If this mine proceeds the haul road trucks both to & from Stratford should be fully covered, I have learnt from the Newcastle experience that uncovered full and empty truck are a dust health hazard, in fact empty trucks are more of a health hazard.

Visibility

My line of site 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 amenity~~ overburden 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 third year of operations, will present intolerable visual pollution at our house and these barriers will be present for the next 16 years or longer.

The northern barrier and some of the western barrier will be substantially removed later in the mining operation 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 total unacceptable.

The amenity barriers alone will produce micro climatic change in this section of the valley. What research has been done on this and what are the consequences of this on those living close by.

I am sure 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 evening glow and pollution from this lighting, therefore, if this mine goes ahead all mining and activities should cease after dark for the full duration of the mining lease. No mention is made of any security lighting which would probably be 24/7 once again destroying our rural amenity.

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 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 draw down of the ground water level within the area of these two 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 amenity~~ overburden barriers are just going to be a disaster as far as pollution of the river and surrounding floodplain and of course my farming enterprise.

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 1.5%, this includes our farm area.

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 EIS clearly states that changes to the surface water flows between Waukivory Creek and Oaky Creek will reduce by 1.5%

As a reverse osmosis water treatment plant is going to be installed I would think the mine should have a no discharge water policy.

Virtually no information is given about the quality of water coming from the RO plant other than the water quality will be as good as the Avon River water: Avon River water quality goes up and down according to the amount of rainfall and river flow.

No information is given regarding where the toxic salts will be disposed to. Will this salt be buried on site to become a problem for future generations?

This project should not be allowed at any time to discharge manufactured (RO) water into the Avon River, Waukivory Creek and Oaky Creek.

The haul road over Waukivory Creek will be subject to flooding, what is being done to stop this truck, coal pollution from washing down stream along with all these other dams that will overflow along the visibility barriers that are on the flood plain.

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 amenity~~ overburden barriers ongoing and problematic at best particularly in thunderstorm events.

Transportation

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 42 and 190 light vehicles per day and 2 to 14 heavy trucks per day extra traffic movements 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.

GRL 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 4 and 16.' 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 per ton of coal. This payment option at \$1 per ton should be maintained through out the mining period. This money should be spent locally to offset the mines destruction of the local area.

The monetary benefits going to the local community are in direct relationship to the 75% of employees living locally. Local was the Gloucester Shire Council of 5,000 people, it is now the Mid Coast Council of 90,000 people. This will probably never happen as it does not happen in other mining areas. Most employees will work on a drive in drive out basis.

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 will put at least 50 households within 2.5km of this development yet 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. 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, physical 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.

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.

Operating Hours

No mention is now made of any pre-start time, so I assume that employs will be required on site between one hour to half an hour before 7am start time. This will have the effect on Jacks of early morning traffic as mine workers start work. This is a rural area not an industrial area.

All mining operations should be restricted to between 8am and 6pm Monday to Friday, Saturday 8am 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.

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 GRL'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.

Conclusion

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 both in our 60's and will not be physically capable of farming for the duration of this mine life (up to 24 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.

This project is still in the wrong place, it is a major health risk, visual pollution, noise and dust too close to people. Don't the people of Gloucester deserve to be treated better than the Thoroughbred horses in the upper Hunter? All properties within 3 to 5 kms of this mine need to be placed onto the forced acquisition list.

This Rocky Hill mine needs to be terminated at this point in time. Under no circumstance should this project be given any other chances to be re-evaluated in 2 or 3 years the people of Gloucester have suffered enough over the last 8 years.

I have made no reportable political donations.

Yours truly,

Edward Robinson