

“Reclaiming our Valley”

Hunter Communities Network

PO Box 14 Singleton 2330

Colin Phillips
Planning Officer
Resource Assessments
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Tuesday 11 October 2016

Dear Mr Phillips

Rocky Hill Coal Project – Application No SSD-5156
Stratford Coal Extension Project – Application No SSD - 4966 MOD 1

Submission of Objection

The Hunter Communities Network is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

We strongly object to the proposed Rocky Hill Coal Project and modification to the Stratford Coal Extension Project for the following reasons:

1. Viability of current mining operations in Gloucester coal field

The Gloucester coal field is not functioning as an economically viable source of coal resource.

The Stratford Mine is currently in care and maintenance, thus not producing coal or providing any public benefit, as approved. The adjacent Duralie Mine has also reduced the workforce and has difficulty managing to the Mine Operations Plan, as approved.

The proposal to develop a third greenfield mine in the Gloucester area has not provided any clear rationale for the project in the context of the unviability of existing operations. The Department of Planning needs to review the information used to justify the approvals relating to both the Stratford and Duralie Mines.

Increasing competition for existing operations that cannot produce the predicted and approved volumes of coal resource is not an efficient approach.

The production of additional coking coal is not necessary to meet demand in an over supplied market. There is no economic rationale for this project or for the modification of the Stratford Mine.

We consider this issue is justification enough for rejecting the Rocky Hill Project.

2. Social Impacts

The proposal to develop an open cut coal mine within close proximity to a large urban population will have significant social impacts that have not been adequately assessed. The significance of the land use conflict and change in nature of the local amenity has not been clearly identified. These changes could cause a negative effect on land values in a community that has attracted retirees and people investing in a quiet, healthy rural environment.

Current NSW Government Policy does not protect communities impacted by mining development in rural areas. The Voluntary Acquisition and Mitigation Policy (VLAMP) allows for exceedances of criteria developed to protect community health.

The existing mines in the region have caused a far greater loss of community members in adjacent villages and surrounding properties than predicted in the assessment and approvals process for Stratford and Duralie Mines. This poor social outcome is highly likely to continue if the Rocky Hill project is approved on the poor assessment of environmental impacts conducted.

3. Environmental Impacts

3.1 Noise Impacts

The proposed changes to the Industrial Noise Policy will inflict an additional 5dB(A) of daytime noise on the community living in quiet rural areas. The VLAMP has identified an increase of 5 decibels as a significant increase. If the proposed Industrial Noise Guidelines are adopted, the daytime noise from this project will significantly impact the community.

It is noted that the proposal is not planning to operate at night. However, the Noise Assessment Report has not based the assessment of Low Frequency Noise (LFN) on the methodology of the Industrial Noise Policy but has defaulted to the Broner method. This is not compliant with current Government policy. The Noise Assessment needs to be redone.

The issue of 'perverse' conditions is exactly what the community, in quiet rural areas with low levels of screening background noise, is affected by. As the A weighted noise is attenuated over distance, the C weighted noise (or LFN) has a greater impact because it is no longer being screened. It can have significant health impacts over a great distance, otherwise people wouldn't notice it at all.

3.2 Dust Impacts

The mining industry has demonstrated that it cannot contain dust from mining operations and blasting activities. Dust pollution with traces of coal occurs inside houses across the Hunter Region. The increased health risks of asthma, respiratory and cardiovascular disease caused by proximity to open cut coal mines is a key concern that is not adequately assessed.

The Rocky Hill Project will cause a major decline in amenity and health in the Gloucester area.

3.3 Water Impacts

The proposal will alter the flood flow patterns of the Waukivory Creek and Avon River. It will also increase the natural variability of these waterways by decreasing flows in the Waukivory Creek by up to 2.1% and the Avon River by up to 1.5%. These predicted decreases in flows may be critical at times of low rainfall.

It is noted that the proposal is yet to acquire necessary water licences under the *Water Management Act 2000*. The lack of onsite water storage will require a predicted daily release of up to 2.5ML of water into the downstream aquatic environment. There is no indication that this volume includes predictions of severe weather events.

Other mines with discharge licences into Hunter water sources have had EPLs turned off to allow for unrestricted release of mine water into the surrounding environment because of unpredicted rain events. The modelling for the water balance needs to consider climate change impacts and increased extreme rainfall events during the life of mine.

The lack of certainty around the disposal of brine from the proposed water treatment is not acceptable.

The identified inflow of saline water from coal seams adjacent to shallow alluvial aquifers demonstrates a high connectivity between the different aquifer systems. This has not been adequately modelled.

The impacts on water sources and surrounding water users, including the environment, are likely to be much higher than predicted in the assessment reports.

4. Economic Impacts

The Gloucester region enjoys an economy based on agriculture and tourism. Land values, new landowners and visitors are attracted by the amenity of the area.

The existing mining operations in the area are not viable and are not generating the level of economic activity predicted and approved. The royalties and jobs are not happening while the neighbouring communities have been destroyed.

The economic impact of a third mine will extend the degradation of environmental and social amenity to the outskirts of the Gloucester township. This will have negative economic impacts that have not been clearly considered in the economic assessment.

The cumulative impact of this proposal has not been clearly assessed as a cost.

The additional impact of increased coal production has also not been costed. The economic cost of climate change caused by the use of fossil fuels is impacting on state, national and global living standards now. Australia has agreed to reduce carbon emissions to a safe level. This will not be achieved if the NSW Government continues to approve new coal mines.

Hunter Communities Network considers there to be no justification for the Rocky Hill Project or the modification to the Stratford Mine. Neither should be approved.

Yours faithfully

A handwritten signature in cursive script that reads "B. Smiles".

Bev Smiles
Convenor