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Gloucester NSW 2422

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

Dear Sir/Madam

Proposed Rocky Hill Coal Mine – SSD-5156

I am writing to express my opposition to the proposed Rocky Hill coal mine at Gloucester.

On the basis of information presented in the EIS for the revised project, my familiarity with the local area, and my experiences of impacts of the existing coal mine at Stratford, I believe that the potential benefits of the Rocky Hill project have been greatly overstated and the likely negative impacts very significantly underestimated.

Having noted the amendments made in revision of the proposal, my fundamental concern remains the proposed location of the mine. It is too close to residential areas of Gloucester for there to be any realistic prospect of avoiding negative impacts on the town's amenity and on individual property values.

Despite use of the name "Rocky Hill" (a high point on the ridgeline east of the project area), this proposal is for development of a mine in the Avon River valley on the outskirts of the town of Gloucester.

The revised EIS has failed to establish that there would be a net economic benefit from the project, at local, regional or state level. The net increase in jobs for Gloucester would be small, and that small potential benefit would be greatly outweighed by the negative effects on the Gloucester community.

Negative effects that must be taken into account include continued displacement of long-established agricultural activities (mainly small family-run farms), and making nearby houses and rural properties essentially un-saleable. The scenic values that the important local tourism industry depends on would be seriously degraded.

Noise from the mine - especially intrusive low-frequency noise - would affect large numbers of residences in and around Gloucester, especially in the Forbesdale, Avon and Thunderbolts residential estates. On the basis of experience of noise from the nearby Stratford mine, which is a very similar operation in the same valley, there can be no confidence that attempts to mitigate noise from the proposed Rocky Hill mine would achieve acceptable results.

Because of the inevitable noise impacts of the mine, the proposal that it would (in time) operate on a virtually 24-hour basis must be rejected.

In addition to noise, light emissions, dust and other fine particulate air pollution would have potential health and nuisance effects on hundreds of residents.

There would also be unacceptable impacts to the natural and physical environment. Too many aspects of mine operation and management of impacts have been left out of the EIS on the grounds that they would be covered in management plans that would not be developed until after the project is approved.

The proposal to delay establishment of the Biodiversity Offset Area by up to two years after commencement of ground-disturbance is unacceptable.

Road traffic to and from the mine would be far greater than the existing local traffic, and would put unacceptable pressure on the Shire Council's road maintenance resources and ratepayers.

The potential impacts of the mine on sub-surface water are still not adequately understood, and inherent risks remain in the proposed surface-water management, including risks stemming from the proposed location of mine infrastructure on the Avon River floodplain.

The mine would result in the clearing of remnants of dry rainforest, which is recognised as a vulnerable ecological community. There would also be impacts on threatened birds and mammals. Those impacts would be likely to result in the complete loss of the populations of squirrel gliders and grey-crowned babbler currently in the proposed mine area. - The gravity of this loss cannot be assessed as the project proponent has not established the size of the local populations.

Such impacts are indefensible, and approval of the project would amount to a dispensation for them to occur.

I hope that the Department's assessment of the application and EIS will take these critical issues into account.

Yours faithfully

Philip Greenwood
11 October 2016