

1333 Bowman River Rd
Upper Bowman
2422
13 October 2016

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

Rocky Hill Coal Project – Application No SSD-5156

Dear Sir/Madam

I oppose the Rocky Hill Coal Project and the modification to the Stratford Coal Extension Project.

It is not necessary to exhaustively list the myriad reasons for my opposition. These have been clearly enunciated in:

1. Gloucester Shire Council's original submission on the proposal, which listed 53 grounds for the refusal of the application. This submission remains largely relevant to the modified proposal.
2. MidCoast Council's submission endorsed and strongly supported by the MidCoast Council's Administrator in a formal meeting of Council on October 12, 2016.
3. Groundswell Gloucester's submissions on both proposals. These have drawn on a broad range of community and other expertise in carefully critiquing the likely short and longer-term single and cumulative impacts of the proposed development.

The former Gloucester Shire Council's Extractive Industries policy (February 2014) also remains entirely relevant. This policy took a balanced approach to coal mining in the Gloucester Valley. For example, it did not object to the expansion of the existing Stratford Coal mine under appropriate conditions. However it was unequivocal in its longstanding opposition to Rocky Hill. Importantly the policy notes the provisions of Gloucester's LEP that in 2000 and then 2010 zoned the site proposed for mine development as for environmental protection purposes.

I request that you seriously consider all the reasons for refusal raised in these submissions and policy as part of your assessment.

As a former Councillor on Gloucester Shire Council, former Chairman of the Board of MidCoast County Council (Midcoast Water), strategic planner and landscape ecologist, I would like to highlight the following key issues:

1. Health impacts – the physical and mental health impacts of pollution (dust,

light and noise) associated with open cut coal mines are well documented. At a population level they can no longer be considered risks. They are certainties. The design of the proposed mining operation, and particularly the use of blasting close to town as well as a long private haulage road with high levels of truck traffic along the length of the valley floor will exacerbate all forms of pollution. The proximity of this mine and the peculiarities of Gloucester's geographic and climatic circumstances will amplify these effects. The proponent's consideration of these effects is superficial, self-serving and inadequate.

2. Water impacts— one of the major difficulties with CSG development in the Gloucester valley was the disposal of toxic **produced water** (naturally occurring coal seam groundwater). The issues of treatment, reuse, and disposal of produced water as well as the disposal of concentrated toxic byproducts of treatment remained unresolved when AGL withdrew from their CSG development. Further, the irrigation trials using diluted produced water conducted by AGL revealed significant issues with respect to feed quality, livestock wellbeing, soil health and water quality. The disposal of produced water poses a particular threat to the MidCoast Water's Manning Water Supply Scheme which provides water to more than 75000 of the region's residents. MidCoast Water has consistently maintained a policy of no river discharge. The proposed water treatment and discharge strategy and disposal of its toxic byproducts is inadequately investigated, scoped and costed. Its proposed use is speculative, problematic and poses a serious risk of failing to achieve its objectives.
3. Post mining rehabilitation – there are a range of serious long-term implications of the post mining rehabilitation of the site. It is well documented across NSW that mining has a significant negative legacy. There are literally thousands of mine sites across NSW that have no or inadequate rehabilitation. Where rehabilitation has occurred issues of subsidence, changes to the quality and quantity of surface and groundwater, long-term changes to ecological potential and ongoing effects of environmental pollution remain a very real and enduring cost for the local community for the foreseeable future. These issues have not been addressed by the proposal.
4. Social impacts – there is ample local discussion about the difference between a *town with a mine* and a *mining town*. Until recently 'coexistence' of mining and Gloucester's other diverse activities has been supportable for most. This proposal will make that social compromise untenable. Gloucester will become a mining town. It is impossible to overstate the likely social dislocation and eventual dysfunction that will result from placing such a dominant mining feature on the border of Gloucester township. This will have very real impacts on the full range of social factors including employment, social identification, cultural diversity, volunteerism, support services, residency, wealth, population structure and community aspiration. The proposal is eerily silent on these issues. Instead it offers a risible annual community support program to cover both

- social and economic impacts.
5. Economic impacts – Gloucester Shire Council engaged a consultant to examine the economic impacts of the original proposal. Their report is unequivocal in its rejection of the proponent's assessment of the economic impacts and in its underlying methodology. The report remains largely relevant to the amended proposal, which appears to be uneconomic, particularly if the likely cost to the local tourism industry (valued by Destination NSW at over \$50M a year) is taken into account. For the last decade the town of Gloucester has been enduring a local economic depression. Housing, commercial and industrial development and population growth have all stagnated after a period of relatively vibrant growth in the early 2000s. This stagnation is directly attributable to the uncertainty surrounding Gloucester's development future. This very real and debilitating ongoing impact will only deepen with the approval of a mine so close to Gloucester. Of particular concern is the absolute constraint this mine will place on the future development of the town of Gloucester, which for the past decades has been growing and is planned to continue to grow toward the mine site. The proposal does not deal with these issues and provides only a risible annual payment for social and economic impacts.
 6. Further impacts on Stratford – Consent was recently provided to extend the Stratford Coal mine. The conditions of consent requested by the local community through their Council were largely ignored by the State in their approval. Twenty-four hour mining was approved, the mine was allowed to expand within an unacceptable proximity to the village, the mine will leave very large and deep void filled with toxic water in perpetuity as a legacy for the local community. To add insult to injury, the community contribution provided by the mine for their activities was well short of the simple economic impacts the mine imposes on the local community. The community of Stratford has born a disproportionate burden of the costs of mining in the Gloucester valley. The ongoing social, environmental and economic costs of this mine are clearly apparent for anyone who wishes to look and have been well documented in complaints to State government agencies. Any further expansion of industrial activity in close proximity to Stratford without seriously attempting to address ongoing and costs to the local community is clearly inequitable.

Finally I would like to paraphrase the words of MidCoast Council Administrator Mr John Turner. While I am not opposed to mining and see it as a crucial part of Australia's economic mix, this mine is simply in the wrong place. It is too close. Its proximity and the local geographic and climatic peculiarities will magnify the foreseeable impacts of this mine.

In March 2015 the NSW Planning Assessment Commission noted that "Bulga village could be rendered uninhabitable and require relocation due to the impact of the Mount Thorley-Warworth mine". This proposed mine was located 2.6 km from Bulga in a wide-open valley. Rocky Hill is located within 1 km of residential

areas in Gloucester. Moreover, Gloucester is located in a tightly confined geography with particular local climatic peculiarities. These will magnify the negative impacts of the mine. The only way of adequately mitigating the entirely foreseeable impacts of Rocky Hill would be to relocate the town of Gloucester.

A genuine triple bottom line cost-benefit analysis of these proposals would show them to be clearly unviable. The EIS does not represent such an analysis.

In the light of this information I oppose both proposals and declare that I have not made a reportable political donation.

Sincerely

Aled Hoggett