

The Amended Rocky Hill Coal Project

Development Application No. SSD 5156

Introduction

The Amended Rocky Hill Coal Project will have ongoing economic, social and environmental problems. It will not be economic when due regard is given to its modest productivity, its high operational costs and its high social-environmental-economic consequences. It will cause ongoing community conflict that will have a regressive impact on Gloucester's development and social well being. It will cause long standing environmental damage to the Gloucester Valley.

A brief overview of some of the relevant issues follows.

The Gloucester Valley's geology

The northern end of the Gloucester Valley's geology is the most complex and vulnerable of any area yet identified for coal mining in Australia. The Valley was formed by intense lateral folding, its northern is characterised by a complex system of geological faults that will create serious problems regarding permanent or long term damage to ground water systems, soil structure and agricultural use.

The social, visual and economic impacts of the proposed mine development will be substantial but the project's initial concern is its unsuitability to the area's complex geology. The dangers created by the area's geology have been understood since the nineteenth century when the Australian Agricultural Company decided that traditional pit coal mining could not be safely undertaken. The Valley's geological structure was the fundamental reason that AGL could not to proceed with its coal seam gas project.

The problem confronting the Amended Rocky Hill Coal Project is that it will be located in the same complex and dangerous northern end of the Valley. The geology is well documented in *Geology of the Camberwell, Dungog and Bulahdelah Sheets, 9133, 9233, 9333, 1991*, Department of Mineral Resources and the accompanying geological map *Dungog 9233*. The problems associated with any form of extractive industry can be understood by reference to that material.

The situation is that the proponents of the Amended Rocky Coal Hill Project have not given due regard to the area's geology and on reading of the inadequate *Specialist Consultant Studies Compendium* did not even understand the geology.

Economic benefits and impacts

The inevitable conclusion is that on consideration of all aspects of the proposed development, the Project's economic benefits will be negative. The proposed mine's output will be modest and its input to the local economy will be minimal. When these are considered against the high costs of site restoration, the reduction in property values and the potential impacts on agriculture-pastoral income and tourist income, it becomes clear that the proposed mine will be income negative for Gloucester and its residents.

Social acceptance and impacts

Social attitudes to coal mining in Gloucester have changed substantially over the past twenty years. Initially there was a reasonable level of support for coal mining as a benefit to the

area's employment and economy. This has changed over those years as the environmental impacts can more readily be understood and the local economic gains can be seen to be less than expected and have even declined as mining becomes more technical and automated.

However, a further social-environmental issue confronts the social acceptance of the Amended Rocky Hill Coal Project – its proximity to Gloucester township and residential areas. The Project has very little community support, even community members who may otherwise offer some support for coal mining projects are opposed because of the mine's economic benefits will be small and its community impacts high. Reliable assessment shows that community opposition to the Project exceeds ninety percent.

Heritage-scenic impacts

The *Amended Rocky Hill Historic Heritage Assessment* submission fails to give due regard to the Valley's long acknowledged heritage significance and correctly apply the relevant assessment criteria. It is clear that the Assessment's sole purpose is to support the proposed development and that a fuller understanding of the Valley's heritage qualities and the application of correct assessment procedures would have resulted in a substantially different document.

The Stroud-Gloucester Valley's scenic-heritage significance constitutes an important component of the Valley's social and economic structure. The Valley's special scenic qualities were noted during the first European exploration and have been noted in the modern sense since the commemorative publication *The Vale of Gloucester*, Eve Keane, Gloucester Shire Council, 1953. That significance has been noted by the National Trust in four separate assessments commencing in 1975 and by community groups in a number of submissions commencing in 1976.

The problem with the *Amended Rocky Hill Historic Heritage Assessment* is that it goes to considerable effort to downgrade the Valley's natural and historical heritage significance because it is clear that the Development will have a serious impact on the Valley's heritage qualities.

Conclusion

The conclusion when due consideration is given to all economic, social and environmental consequences of the Amended Rocky Hill Proposal is that it will be economically negative for the Gloucester community as well as socially and environmentally damaging. The inevitable planning conclusion that results from these considerations is that development consent should be refused.

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