

Stratford Extension Project - SSD-4966 Modification1

Statement of Environmental Effects

Submission by Groundswell Gloucester

This application seeks to modify the Stratford Extension Project (SEP) in order to support the proposed Rocky Hill Coal Project (SSD-5156). Groundswell Gloucester objects to the proposed Rocky Hill Coal Project (RHCP) and consequently objects to this SSD-4966 Modification 1.

Groundswell Gloucester's substantive objections to the RHCP are contained in a separate submission.

The following grounds for objection relate specifically to the SSD-4966 Modification 1 statement of Environmental Effects Report and Appendices.

Economic Viability

Given current and forecast declining demand for thermal coal, there must be a significant question mark over the future economic viability of the SEP and huge doubts as to whether the project will actually proceed. Tacit support for this view is provided by Stratford Coal's own somewhat diffident statement that "The approved Stratford Extension Project is assumed to commence in approximately 2018 ..." (SEE Table 3 Note Page 28).

Given this uncertainty, how can the RHCP be assessed on the basis of a commercial agreement between GRL and Yancoal "involving interactions relating to the processing of RHCP ROM coal using Stratford Coal's infrastructure" when in fact that infrastructure may be mothballed?

Noise

Intrusive noise nuisance has been a constant source of complaint about the Stratford Mining Complex (SMC) since it commenced operations. The delivery to the SMC and processing of RHCP ROM coal will significantly add to the noise nuisance experienced by surrounding residents.

For a detailed analysis of noise impacts from the SMC on surrounding residents, we direct you to the submission by the Barrington-Gloucester-Stroud Preservation Alliance to the original Environmental Impact Statement for the Stratford Extension Project, in particular Chapter 2 SMC – Residents Experiences.

Pertinent extracts from this survey of residents are included below.

"Intrusive noise nuisance was experienced over a wide area and at all points of the compass. There was little variation in the descriptions of the noise. It was usually described as being a constant low roar or rumble accompanied by the sound of heavy machinery operating under load. The nuisance is largely due to the constancy and nature of the noise rather than its volume.

There was some variation noted in the time of day when the noise nuisance was most intrusive. For some, it was essentially a problem at night while for others it was a problem during the day, particularly in the morning and late afternoon. For a few, it could occur at any time of the day and night.

Some residents reported sleep disturbance and attributed it to mine noise, because the noise was always apparent when they had been woken.

Intrusive noise nuisance from either mining or CHPP operations seemed to be less of a concern for village residents than for those living in the rural environs. Blasting noise and vibration was however, a bigger concern in the village.

It may be that the noise experienced in the village retains a significant high frequency component that masks the disturbing low frequency component. By the time it reaches the more distant residents, the high frequency component has been attenuated, making the “noise” more noticeable. Or it may simply be that many in the village now ‘tune out’ the mine noise.

Whatever the explanation, every person remarked, without prompting, about how peaceful it was during the recent three-week cessation of mining operations at Stratford. “As living in the country should be” was one comment. “Bliss” was another description offered by several people.

The complaints process was another area in which the experiences were essentially similar. Residents said that they were reluctant to complain when the mine first opened, choosing instead to “put up with it” given that it was to be only for a limited time.

Many have had occasion to complain over subsequent years but most have now given up complaining because the process is completely unproductive. “Complaints go nowhere”, “No-one does anything”, “What’s the point, it just falls on deaf ears,” “They always say they are operating within the approved conditions” are some of the reasons given as to why they no longer complain.” (BGSPA January 2013)

At Page 25 Paragraph 3 the proponent makes great play of the declining number of complaints lodged since 2011, albeit with an acknowledgement that this reduction is in line with reduced activity on-site. The declining number of complaints received consequent to reduced activity confirms the statements by residents in the BGSPA submission. When the mine is operating, intrusive noise is a significant and persistent fact. This is not imagined or exaggerated and residents do not complain for the sake of complaining.

It is apparent from discussions with residents that the number of complaints recorded does not accurately reflect the full extent of noise disturbance they experience. As stated in the BGSPA survey, many residents have given up complaining, largely because the Complaints Handling Procedures are seen to be focussed more on ‘managing’ the complaint and the complainant rather than investigating the complaint to finality by identifying the noise source and implementing mitigation measures.

The complaints record demonstrates that much of the intrusive noise is generated at the CHPP and by the dozer working the product stockpile. This will be a burden directly and significantly exacerbated by the processing of RHCP ROM coal.

The noise modeling presented in the SEE suggests that this modification will have a fairly benign impact.

However the large number of complaints concerning intrusive noise, lodged by residents located in areas where noise modeling and monitoring predicted noise impacts below the Project-specific Noise Level (PSNL), suggest that either the modeling is not a good indicator of potential noise impacts or the monitoring is not accurately recording noise levels.

Residents have no confidence in the noise modeling presented in the SEE.

Noise modelling overestimates the Rating Background Level (RBL) and gives insufficient weighting to the low frequency component of the noise spectrum emitted by heavy machinery. It also has no regard at all for the context of the noise source i.e. a squawking kookaburra may emit a greater sound pressure wave than distant industrial machinery but at a residence in a bush environment, it is normal and less intrusive than the alien sound of the heavy machinery.

As low frequency noise is attenuated by distance at a much lower rate than is high frequency noise, the prominence of low frequency components in a noise profile increases with distance from the source. The resulting dominance of low frequency components at a distant receiver compounds the disturbance caused by that noise. This effect, which already leads to intrusive noise at residences located up to 5km from the SMC, has not been acknowledged in the noise impact analysis presented in the EIS for the revised RHCP.

Other

At Page 29 Paragraph 1 it is stated that the majority of rejects from processing of RHCP ROM coal will be discharged to the Avon North Pit. What if the SEP does not proceed as planned?

At Page 31 Paragraph 2 it is stated that Table 4 on the same page lists the proposed truck movements from the RHCP. It does not. It simply lists the number of vehicles to be used year-by-year.