NSW Department of Planning and Infrastructure

Sydney NSW 2000

11 December 2013

Re: Submission – Mandalong Southern Extension Project EIS

Dear Sir/Madam,

Please find herein my submission on the abovementioned EIS. While I do not oppose coal mining per se, nor this project in general terms, I do not support a number of aspects relating to the project, particularly in relation to the access road for the proposed southern surface infrastructure. These are detailed within my submission. I also provide recommendations resulting from my review.

I seek transparent, genuine practices from Centennial that put community and environmental concerns at the forefront of their operations, within the context of a profitable enterprise.

My primary concerns are documented in the following sections.

Inappropriate Consultation during Exploration Program and Relevance to Current Project

Inappropriate consultation

During their exploration program for the Mandalong South Project, Centennial consulted (with reasonable diligence in my experience) with residents regarding the location, nature and duration of their drilling program. As part of this, Centennial cited a guarantee on compensation for noise affected residents during the drilling program. Although concerned about the noise impact from drilling, I was accepting of it and satisfied that if drilling were to occur close to my residence Centennial would, based on their claim, be obligated to either modify their drilling approach or provide some form of compensation. However, when drilling occurred some 250 m from my residence, despite my notification of the significant disturbance this caused, Centennial refused to either modify their drilling approach or to offer any compensation. This was disappointing as I had accepted the word of the company's representative. Although Centennial staff later accepted that they erred, disappointingly they were not forthcoming on an appropriate apology or compensation. This event, together with subsequent events (noted below), have now instilled in me a lack of trust regarding the mitigation and management commitments made for the Mandalong South Project.

Contractor Misdemeanour

During the exploration program I and other residents were disappointed with the significant increase in roadside littering that occurred compared to the background level, which was very little to none. This is despite Centennial commitments to ensure that its contractors behave with appropriate professionalism and stewardship regarding the environment they work in. I am concerned that this practice will continue, and that both the Mandalong Valley environment and the wellbeing of the residents will be detrimentally affected, particularly during the construction phase.

During exploration drilling my private driveway was frequently and non-permissively used for large vehicle u-turns, despite frequent requests by myself to Centennial to cease this practice. Centennial responded appropriately and advised that they had reiterated to their contractors that they did not have assumed permission to make use of my property. Despite this the practice continued for a time. After further occurrences I was later satisfied after that Centennial responded appropriately with a limited physical re-grading of my lower driveway. However, similar to the points above, these events led me to develop a strong concern for Centennial's ability to instil community-focussed responsibility in its contractors.

Consultation Process and Siting of the New Surface Infrastructure

During their engineering design studies in relation to the siting of the new surface infrastructure facility, Centennial invited affected residents to a briefing. At the briefing we were presented with three alternative sites for the facility and associated access road. We were told that these were the only three alternatives under consideration, and invited to provide feedback and make comment. In good faith I provided feedback and comment. Some months later I received mail that thanked me for my input and advised that a fourth (and previously undisclosed) alternative had been selected and that Centennial would not be seeking further input from residents. My view on this alternative (which is now the preferred option) is documented below. I found Centennial's conduct on this matter to be artificial in terms of genuine consultation, and misleading in terms of the options being assessed.

Noise

Existing Background Noise

The noise modelling documented in the Noise Assessment section (Table 51, p. 275) shows that current background daytime noise level for my residence (R26) is 34 dBA. My residence is located in an extremely quiet valley, where the only noticeable increase in noise during my ten years of residence has been that related to the mine exploration activities.

Noise Impacts

The predicted construction noise likely to be inflicted (Table 54, p. 278) is 54 dBA. This is an increase of 20 dBA, on average, on the current 34 dBA. This could occur for 11 hours per week day and 5 hours on Saturdays, totalling 60 hours per week. There is no clear timeline for the duration of this construction noise, other than the quoted 78 week construction period. Based on this, there is no guarantee that such elevated noise levels would not be experienced by the occupants of my residence (adults and children) every week of the year for 78 weeks.

In my view this exacerbated increase in noise is completely unacceptable and should not be permitted. An increase of 20 dBA for potentially 78 weeks, 6 days per week is extremely obtrusive, excessive and inequitable.

I recommend that construction of the access road and surface infrastructure is limited to 8am-5pm on weekdays and not undertaken on weekends, and that Centennial commit to further measures to reduce noise for affected residents including my residence, but also particularly R25 and R24, using measures that do not require the construction of noise barriers on our properties (as is suggested in the EIS for R25 and R24).

It would be appropriate for modelling of the proposed specific noise management measures to be provided. Ideally, this would include noise contour maps for each stage of construction to allow the community to easily review the predicted impact.

The proponent states that they will use all 'reasonable and feasible' noise mitigation measures to reduce impacts. However, it is unclear whether the mitigation measures proposed are the only measures that are considered to be 'reasonable or feasible' and what level of benefit would be provided by implementing all 'reasonable or feasible' measures.

Visual Impacts

In general the siting of the access road for the proposed surface infrastructure will change the rural character of Mandalong to one of industrial nature. The access road will require a relatively large and obtrusive intersection, together with a long and visually displeasing access road across country that is currently agricultural and scenic in nature. The scenic values will be significantly and irreversibly altered by the access road. This is undesirable and unwarranted, and could be averted by seeking an alternative access through existing road infrastructure.

Traffic

Page 13 of the traffic report states that Mandalong Road has experienced:

> traffic growth of approximately 20% per annum over the last 3 years which is considered unusually high and generally not sustainable over a long period of time. This growth rate may be artificially high due to the low background traffic volumes and traffic associated with recent growth in the Morisset Industrial area.

It is obvious and highly unlikely to anyone living in Mandalong Valley that this high increase in traffic has not been generated by the Morisset Industrial area (as stated in the Traffic report) that is on the other side of the M1, or by development in Mandalong Valley. Such reasons are inherently false because (1) there has been very little residential or other development in Mandalong (apart from mine-related development); (3) the through-road status and condition of the road has not been substantially altered or improved over that time, therefore will not have attracted more through traffic; and (3) there is no reason why visitors to the Morisset Industrial Area would frequent Mandalong Road beyond the M1 Motorway. Rather, the very obvious reason for increased traffic has been exploration and EIS activities for Mandalong South. It is therefore artificial and misleading to compare changes in vehicle trips resulting from the proposed mine, and to use traffic surveys

carried out during the time in which exploration activities are actually occurring, to those generated by the exploration and investigations for the proposed mine.

The traffic assessment does not indicate precisely where counters were located, nor their relevance to the proposed Mandalong South surface infrastructure facility. Nonetheless it is apparent that the closest counter was at Deaves Road, some distance (approx 4 kilometres) from the proposed access road. It would have been much more appropriate to place a counter around the Chapmans Road intersection. I request advice on the vtph numbers for the Chapman Road intersection, with a comparison against the predicted movements, so that a direct and reasonable comparison can be made by residents who will be affected.

I do not support the siting of the proposed access road for the proposed surface infrastructure. During their consultation (referred to earlier) Centennial put forward three options for surface infrastructure and road access. The final design exhibited does not reflect those three options. In my feedback to Centennial I advised that the siting of an access road on Mandalong Road south of Chapmans Lane would be inappropriate because of the need to construct a long, high-set, visually inappropriate access road across the Morans Creek floodplain. I also advised that the significant additional traffic generated would be a safety hazard for the school bus that services a school bus stop and does a u-turn on Chapman road each morning and afternoon (a fact that, significantly, does not appear to have been assessed in the Traffic assessment report). I recommended that consideration be given to using Chapmans Lane as access to the surface infrastructure and in doing so Centennial could upgrade the entire intersection and provide safe bus turning facilities. This would serve to provide mine infrastructure access together with improved safety and wellbeing for the community and in particular school-aged children. Centennial appear to have made no consideration to my concerns and suggestions in relation to the school bus. I recommend that this alternative be reconsidered. I feel that, if the mine extension were to proceed, Centennial should be seeking to provide for immediate and significant community benefit. The current road infrastructure does not provide for safe stopping or turning opportunities for the school bus. This will significantly deteriorate with the predicted 67 or more vtph increase anticipated for the area and will result in an increase in risk of serious injury or death to school-aged children who are picked up along Mandalong Road, including at the intersection of Chapman Road/Mandalong Road.. In particular, as the increase in vehicle movements is significant and will occur over a short period of time. By siting the access road from Chapmans Road, Centennial could provide for such significant and upfront community benefits while still achieving the goals of the mine. Consideration of providing safe bus stops along Mandalong Road should also be made. It would also provide a long-term legacy for the safety of school children that would outlast the direct benefits of the mine itself.

Subsidence

Within the substantial body of information provided I cannot find a readily interpretable figure or table that clearly indicates the subsidence likely to be experienced by my residence. Centennial has repeatedly indicated to me that my house will not experience any subsidence. Unfortunately I cannot confirm or refute that based on the information provided in the EIS, which is somewhat disappointing. Given the lack of confidence that I have developed based on the Mandalong South Project's breach of commitments, I request that centennial provide specific information to me on

the subsidence impacts that my residence is likely to experience. For such a serious matter it is concerning that the information is not readily obtainable or that a specific personal briefing has not been provided by Centennial staff.

Recommendations

Noise

I recommend that construction of the access road and surface infrastructure is limited to 8am-5pm on weekdays and not undertaken on weekends.

I request that Centennial seek further means through which to reduce the impact of construction noise on residences 26, 25 and 24, which will collectively experience unacceptable increases in noise from the extended construction phase. Options other than the construction of noise barriers on residences 25 and 24 should be investigated as these will be extremely intrusive.

The modelling of the proposed specific noise management measures should be provided. Ideally, this would include noise contour maps for each stage of construction to allow the community to easily review the predicted impact.

The 'reasonable and feasible' noise mitigation measures that the proponent states could be adopted to reduce impacts should be fully documented and assessed.

Access Road Siting

Centennial should reassess the location of the access road, and seek to achieve greater community benefit by siting the access through existing road infrastructure such as Chapman road, and in doing so upgrade the intersection to improve school bus stop and bus turning facilities.

Traffic

The traffic analysis should be reassessed to provide details on the vtph numbers for Mandalong Rd. just south of the Chapman Road intersection, with a comparison against the predicted movements, so that a direct and reasonable comparison can be made by residents who will be affected.

The traffic analysis should include an assessment of the usage of the Chapmans Road – Mandalong Road intersection as a school bus stop and turning point, and the risk of collision and injury or death that could be experienced as a result of the significant increase in vehicle trips resulting from the mine extension, particularly its construction. This is a very significant failing of the EIS.

Subsidence

I request that Centennial provide me with clear, concise information on the likely subsidence that my residence will be subject to, so that I am able to be in a position to provide comment on this, which is currently not the case.

Conclusion

I trust that my submission is received and accorded due consideration in the Department's assessment of the EIS and its merits.

I look forward to further correspondence from the Department on its assessment of the EIS and future avenues for consultation with and input by myself and other concerned residents of Mandalong Valley.

Yours faithfully,