

NSW Planning and Environment

Major Projects 24/10/2018

Mr Stephen Odonoghue

**Re Whitehaven Coal- Vickery Expansion Project**

I correspond with comments in relation to Environmental Impact Statement for the above mentioned Major Project, which is on public exhibition

It is disappointing that Whitehaven Coal have chosen not to do design of the proposed rail loop spur as part of the EIS

It is in relation to flood impacts of the development, "Appendix C" that I comment, with reference to my rural experience in the Gunnedah District for over 40 years as a farmer and contractor, across many properties extending from Carroll to Boggabri, several in the direct vicinity of the proposed new railway line spur

I have been previous, a landholder representative of the Carroll - Boggabri Floodplain Management Committee, along with six others and government appointees, that oversaw the instigation of the comprehensive "Carroll- Boggabri Floodplain Management Plan"

Landholder Community Representatives- Carroll - Boggabri FMP

Bill Weakley chairperson, Graham Norman- Zone 1, Geoff Hood, John Sunderland-Zone 2, Geoff Hood, Lennox Waugh (Kurrumbede)-Zone 3, Mike Barnier, Trevor Loveridge-Zone 4

It was this group that with their broad range of experience's, oversaw and instigated as part of the planning process. Extensive community consultation and meetings, authorized the Airborne Laser Survey of the entire Carroll- Boggabri Floodplain Study Area, then oversaw that the resultant simulated floodplain model runs of different Average Expected Probability (AEP) of different flood events, model runs that were ground truthed against historical recorded flood height measurements

The resultant Carroll to Boggabri Floodplain Management Plan has been a significant planning tool for the Namoi Valley. I note that more modern technology could be slightly more accurate. However Whitehaven Vickery Extension Project consultants keep referring to the initial Carroll to Boggabri FMP, Compendium of Data 2003, Draft Plan 2005, Implemented Plan 2006.

**Comments on the Appendix C Flood Study**

-Vickery Consultants have used Namoi River Flow's, plus local creek streamflow - Dead Mans Gully, Collygra, Strathford and South creeks, for calculations of local flow's on the upstream flowpath immediately above the Proposed new Rail spur. They have missed the Rangari Creek catchment in calculations. Rangari Creek which in flood events enters the Namoi Valley through the Kelvin Gap, can be fast moving making its way to the Namoi River vicinity Blue Vale Road just above- "Kurrumbede" - Strathford Creek, via overland flow. This Rangari creek flow, is below the Namoi River Gunnedah Gauge station. Rangari creek catchment, needs to be mapped

-Consultants have assumed that these local creek flows will not directly coincide with Namoi Flood events, however in the 1970's, the Namoi River was in flood conditions for up to a couple of weeks, So It would be Best to at least do a model run with a result of simultaneous creek and river flood events.

-The Methodology used for the proposed rail spur, has been to design for a 1% AEP 1955 1/100 style of flood event. The proposed Rail spur is directly across the entire Namoi Valley Floodplain, No Flood Model runs have been presented for an Extreme or Probable Maximum Flood(PMF). Recent NSW Major Project energy company, "Gunnedah Solar Farm" development on the Namoi River floodplain, downstream of Carroll, have used and modelled PMF in their EIS, why not Whitehaven- Vickery Extension Project!!!!, For the proposed rail spur with potentially more impact. PMF needs to be taken into account for a proposed rail line spur, that could be a dam across a floodplain?.

-The design parameters of this permanent infrastructure should be above a 1% level, there was a bigger Namoi flood in 1864 for example, maybe a 2 X 1% should be designed for, or actual PMF. This proposed rail loop is permanent infrastructure, could cause major problems in flood times

-No Design plans of the proposed rail loop across the floodplain has been provided to the nearby landholders, or the community. Whitehaven have in discussion with some, have indicated elevated on piers, embankments and culverts??????

-No changes to flood flow effects (velocity-depth) of the proposed rail spur in the EIS?, Dead Man's Gully, the Central Floodplain!!!!!!!, Apart from some model results near Strathford creek/Namoi River/Kamilaroi Highway. ??????. Note that in a 1% flood there is almost three times the floodwater in Dead Man's Gully and across the central floodplain than the Namoi River itself. Is the proposed rail spur across the entire floodplain to the existing rail line near Emerald Hill, to be totally elevated on Piers, It would appear so!, as no EIS has no changes to flood impacts(Velocity/depth) across the broad floodplain?, It is not good enough to do design and flood model runs after the EIS is approved. The default option, with no proposed rail spur plans provided, is to have the entire rail spur on piers, **before** development consent could be granted.

Data from the SMEC 2003 Carroll - Boggabri FMP of a 1% 1955 show flow rate's cubic meters across the floodplain attached, disappointing that Whitehaven Coal have not presented broadscale EIS design of the proposed rail spur

Regards Geoff Hood

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