

NSW Planning and Environment
Major Projects
29 August 2019

Re: Russell Vale Underground Expansion Project - 09_0013

Dear Sir/Madam,

I wish to object strongly to the above development application which proposes to extend mining operations at Russell Vale Colliery in the Southern Coalfield. My interest in this application is as a Sydney resident concerned at the impact of coal mining in Sydney's drinking water catchment for myself, and my extended family, now and into the future.

GENERAL COMMENTS ON EXHIBITION PROCESS

By way of initial comment I express concern at the way documents and the history of this important and contentious development application has been placed on exhibition. It is very confusing for the average person.

Firstly, the application states it has a number 09_0013 but a differently titled 09_0013 is also stated on the Major Projects website to have been withdrawn at some time previously with an "undetermined" decision. No documents are attached to the withdrawn 09_0013 on the website. The application form and supporting documents related to the current exhibition are dated 2009, and presumably from the initial exhibition of old 09_0013 stated to have been withdrawn.

This raises some issues regards the actual status of this current application and whether it should be considered a new application with a separate number especially given it has a different title to the original, the company ownership has new controlling interests, with a name change, and mining techniques are different to the original 09_0013.

The environmental planning and assessment process can be a "shrouded" process for the general public. In the interests of transparency and improved public confidence a concise supporting document explaining the history of the planning process, the change in entity now making application and what is actually proposed in the second 09_0013 would be useful for inclusion.

Secondly, there is no information on the new Planning website about the 09_0013 on exhibition currently. The new portal is supposedly for applications currently on exhibition. This limits the public exhibition process.

Thirdly, as one works through the documents on exhibition the critical response document by the applicant to the second Planning Assessment Commission review is 116.1 MB in size. This is incredibly large for most home computers especially any with poor Internet access.

I was unable to download the document. The planner I contacted kindly split the document to send the Executive Report but the onus should be on the applicant to provide documents of a reasonable size to facilitate public comment from the general community.

SPECIFIC CONCERNS

- The environmental impacts of coal mining on Sydney's drinking water catchment have been much greater than predicted at the time of approval. This has been demonstrated in a number of recent reports and expressed by agencies such as Water NSW etc. but assessment and understanding of the overall impacts of coal mining on drinking water quantity and quality has been limited. **In the absence of such assessment it is argued that approvals of any further mine, or extensions to current approvals such as 09_0013, is irresponsible and not in the public interest.**
- Loss of water within the catchment into the drinking water supply is a critical issue especially as Sydney is now reliant on the expensive desalination plant. The Chief Scientist's Independent Expert Panel for Mining in the Catchment investigation has a particular focus on the risks to water quantity within the catchment and presumably will make recommendations pertinent to the assessment of 09_0013. The final report of the Chief Scientist has not been completed. Its informed report can provide the necessary information which ensures proper assessment of the proposed expansion of this one mine within the overall context of cumulative risks to the catchment's holding capacity of surface and groundwater systems from past and current mines. **The Department of Planning and environment should not progress assessment of the new 09_0013 until it has received this independent advice.**
- With the declining levels of available drinking water within the catchment, and an increase in water use demands as Sydney grows, accurate records of water extraction by mines from the catchment is imperative and necessary in the public interest. This current water use by mines does not appear well monitored or regulated and lacks transparency for consideration by the general public. **The Department of Planning should also take account of the outcomes of the Natural Resource Commission's review of the Greater Metropolitan Region Unregulated and Ground Water Sharing Plans when finalised.** The impact of declining rainfall associated with a changing climate may necessitate significant changes to Water Sharing Plans and expose serious inadequacies in how mines monitor and record their water use within the drinking water catchment.

- In the applicant's Revised Preferred Project Report and Response to Second PAC review, it is stated that the proposal is now relying on a first workings mine method rather than a long wall mining method.¹. It is my concern that this represents a "foot in the door" approach by the applicant and **hopefully a rigorous independent evaluation of this apparently newish method occurs as part of the environmental planning and assessment process.**
- The Greenhouse Gas emissions arising from this project will pollute the atmosphere whether in Australia or India. The pollution from the extracted coal will cause future climate change impacts when most people in the world are trying to reduce such pollution and mitigate the risks posed by a fast changing climate. **This important matter should form part of the assessment considerations.**

CONCLUSION

A changing climate poses significant threats to all Australians. For Sydney people this will most likely mean reduced rainfall within the drinking water catchment, even with extreme weather occurrences.

The historic landuse activity of coal mining in Special Areas, areas supposedly with restricted access to ensure a clean catchment, has caused significant adverse impacts on both the quantity and quality of water available. This damage has been documented and reported. A series of independent reviews are now in place to hopefully provide greater insight into the cumulative and compounding impacts of failure and damage by individual projects and how to better manage the risks arising from these impacts.

The environmental planning and assessment process must take account of the environmental impact of the new 09_0033 both within the context of the cumulative damage already to the catchment and the broader impacts of a changing climate. In the absence of such consideration the process fails to properly meet its object to facilitate ecologically sustainable development.

Yours sincerely

Cathy Merchant

¹ It should be noted that this method change is not reflected in the application form as per my comments above. I understood development application forms were required to be current and properly state the proposal to ensure transparency and facilitate proper public comment.