

Daniel Howard - Fwd: Online Submission from Janet Murray (object)

From: Paul Freeman
To: Daniel Howard
Date: 19/10/2010 4:54 PM
Subject: Fwd: Online Submission from Janet Murray (object)

>>> Janet Murray <janetmurray@dragnet.com.au> 19/10/2010 4:51 pm >>>

Dear Mr Freeman,

RE: P 07_0087 EXTENSION OF THE PROJECT APPROVAL AREA FOR OUT-OF-PIT OVERBURDEN EMPLACEMENT AND REHABILITATION, ALTERNATIVE HAUL ROAD AND POWERLINE RELOCATION

I am writing to object to this modification currently on exhibition. My reasons for objecting centre around the misrepresentation of the level of consultation with the local community. I particularly object to the inference that I have been made aware of the modifications via the Bloomfield Consultative Committee and have raised no objection to the further impacts about to be foisted on my local community:

 The Director-General's Requirements include the need to consult with community groups or affected landowners. The only community consultation appears to be via the Bloomfield Community Consultative Committee, of which I am a member, together with two other community representatives. The minutes of the meeting from 3.5.10 record KH advised that a variation (Section 75W) would be submitted in the next month to cover some minor changes to the design of spoil placement and rehabilitation, upgrade of an existing road to allow coal haulage and the realignment of a powerline. The modification will allow improvements to some areas that were rehabilitated over 20 years ago so they meet current criteria in terms of slope and final landform. The discussion lasted approx 5 mins and made no reference to the Air Quality Assessment, the Noise Impact Assessment or the Biodiversity Assessment or the visual impact of the modifications.

 In October, I happened to see the ad in a local paper notifying the Modification was on exhibition. I asked Keren Halliday from Bloomfield for a hard copy, which she delivered the next day 14.10.10. I believe that members of the Community Consultative Committee should have been issued with a hard copy of any material on exhibition at the START of the exhibition period. Our presence on the Committee surely demonstrates our interest in the impact of the mine on our communities. Prior to appointment, we were asked to demonstrate our links to the community, to facilitate dissemination of information. Surely when modifications to consents are being made, we should be given ready access to information to consult with our community?

 The Black Hill Environment Protection Group has been in existence for approx 28 years and has reviewed most development proposals and planning policies for our area in that time. I believe that community groups such as the Black Hill Environment Protection Group should have been consulted by Bloomfield DURING the preparation of the Modification Application, as per the Director General's Requirements.

In the limited time available to review the Modification Application, I note the following concerns:

 The relocation of the power line requires the removal of an additional 10 hectares of native vegetation, including 7 Ha of LHSIG EEC to enable the infrastructure to connect the power supply to site equipment, namely transformers, earth leakage grids and cables. This seems to be excessive clearing when the infrastructure referred to is not even apparent on Fig 2 Overview of Mine Area and Activities.

 Table 9 in Section 6.1.4 shows noise levels for various heights of the dump in area B. Figures are shown for heights from 75m to 100m. These heights seem inconsistent with the original topography. The ? mountain? that has been built along the southern boundary has been a cause for complaint from locals objecting to the loss of visual amenity and the fact that these high dumps allow more carryover of dust on windy days. The height also allows noise to travel more readily to residential receptors to the south, as evidenced by the exceedences predicted at Residence M on John Renshaw Drive. Exceedences at Browns Rd and Black Hill Rd are also predicted once the height exceeds 84m. Are these heights really necessary? The application includes Photograph 6 View towards Bloomfield Mine site from Tipperary Drive, Ashtonfield. I wonder if they are aware that the overburden dumps are visible on the horizon from Neath hill, a distance of some 17km away?

 The Modification Application states in section 6.2.1 Existing Rehabilitation and Final Landform Strategies ?Overburden dumps will be reshaped with a maximum slope of 18 degrees.? Again, this topic has come up in the Consultative Committee meetings, where LM advised the area in question has been tree seeded and is at the final height. The slope of the final landform has been designed at 10 degrees. It was noted that historically up to 18 degrees had occurred but current approach limited to 10 degrees. The community wants a final landform that is similar to their original view, not something that will look like an overburden dump forever, incapable of rehabilitation due to erosion on too-steep slopes.

 Section 6.6 Noise suggests that in the South-Eastern area (Area E) noise mitigation measures will include Dumping and rehabilitation during the daytime period only (7.00am to 6pm Mondays to Saturdays, 8am to 6pm Sundays). As ?Operational noise levels for Area E are predicted to exceed Approval criteria at locations E, F and M during the daytime period?, surely this operation could be limited to the daytime period during Monday to Friday, when fewer people are home? Bloomfield?s mining operations normally occur Monday to Friday, so why seek permission to perform an operation that exceeds your approval conditions on days when you don?t normally operate??

 Figures 8-10 in the Air Quality Assessment, looking at the impact of Bloomfield Colliery and other sources all show a ?hotspot? of increased concentrations inside the Donaldson boundary to the north-east of residence F. While the concentrations at residence F do not exceed the impact assessment criteria, one can?t help but wonder whether they are exceeded over 25% of that privately owned land on which residence F sits (as required by Consent condition 15)? It is also unclear to me what emissions and values have been included in the cumulative assessment, as the letter from PAE Holmes says ?Emissions from these common facilities have only been included in the cumulative assessment. It was assumed that annual average concentrations due to emissions from distant mines and other sources, including the shared CHPP are? These data are consistent with values used in recent assessments?.

While I applaud some aspects of Bloomfield?s Modification Application ie a desire to properly rehabilitate areas not done properly before and the reduction in fuel use by shortening haul routes, I urge Planning to ensure that these aims are not at the expense of the environment and surrounding community. I also urge Planning to further clarify with Bloomfield (and other miners) the need for genuine consultation with the community within which it operates.

Yours faithfully,
Janet Murray

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Submission for Job: #3662 Bloomfield Coal Project - Mod 1

https://majorprojects.onhiive.com/index.pl?action=view_job&id=3662

Site: #905 Bloomfield Coal Project

https://majorprojects.onhiive.com/index.pl?action=view_site&id=905

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