

Director, Mining and Industry Projects,
Major Projects Assessment,
Department of Planning,
GPO Box 39,
Sydney NSW 2001

02 September, 2012

Dear Sir/Madam,

Project Application No. MP 10_0046 MOD 1

I write as a concerned citizen and near neighbour of the location of this Project.

At the outset, I wish to record my concern at the unseemly haste with which this consultation has been forced forward by your Department. It is inconceivable that members of the public could properly digest the subject proposal and comment in detail given the voluminous and poor quality material constituting the application. Further, the proponent of the application has been permitted to change the documents during the course of this process and I am shocked to learn that material was added to the documentation late last Friday.

I have a written invitation to peruse the documents and continue to provide feedback whilst your assessment continues. Can I please have confirmation that the proponent will not now be permitted to modify this application any further? I shall be sending further comment when my time permits.

I also wish to record my dismay that the standard of the proposal is one which I would fail under examination at the post-graduate level – given that it is supposed to be under the professional management of suitably qualified engineers this is deeply disturbing. The arguments in favour of the proposal are piece-meal and shoddy. Logic is flawed and insufficient critical thinking by the proponent is displayed. In fact, one might reasonably posit that the proponent does not actually expect the proposal to receive a level of scrutiny which would lead to the application being rejected based on its self-evident lack of merit! If the proponent actually expected proper scrutiny of this proposal to undermine the Sydney Water Catchment and Mt Ousley Rd one suspects that they would have ensured the application was at least superficially complete, but many documents referred to as part of the application simply either do not exist or have not been supplied for comment. This alone should have stalled your process – it should not be up to members of the public to draw to your attention flaws of this nature, that is what your staff should have done before proceeding to any public display.

The proposal in and of itself appears to seek approval for unsustainable elements of a much broader and very contentious expansion project by stealth –one piece at a time – and in the case of Longwall 4 *ex post facto*.

I call on you to instruct that all work on this site cease due to the many non-compliances with the existing approvals known to your staff and that work not be permitted to recommence until compliance in all aspects is demonstrated.

I would suggest that once the proponent has demonstrated that they can comply with the existing consents then a process should be established to properly approve the entire proposal which the proponent seeks via an open and complete development approval. The infrastructure at the site of this proposal is antiquated and inadequate to the operations which are in train at present in the context of sound management and forward planning. The only apparent upgrading of equipment is where it will allow shedding of staff – not where it affects the amenity of the surrounding community.

The fact that the mine is in a residential area and must therefore be operated to a high standard of environmental management was clear to the proponent when they bought the mine - this is not a case where a long-standing operator may rely on historic “rights” under antique legislation. Most residents had been led to believe that the mine was being decommissioned at that time of transfer and have valid expectations that any resumption of operations under a new owner will be assessed against modern standards of operation and environmental assessments.

I take issue with the validity of the following elements of the proposal:

- 1) Water Security: This proposal seeks consent for apparently unprecedented 3rd tier mining under the Sydney water catchment including a second longwall. According to the mine managers there is no evidence base from which a reasonable model for such mining can be constructed – the proposal is effectively guessing that it will all be ok and that this important area of water catchment probably won’t be damaged. This must not be allowed to occur
- 2) Water quality: as above, there is no valid basis to build models capable of predicting how the upland swamps and waterways will be modified nor the effect this will have on water quality reaching reservoirs. This must not be condoned
- 3) Subsidence: undermining of Mt Ousley Rd near Cataract Creek is contemplated – or underway. Appropriate subsidence management plans are difficult or impossible for this 3rd tier (yet we are told that the Longwall was incorrectly aligned at the outset and the coal quality is compromised). Longwall 4 is anecdotally reported to have exceeded predictions by over 500% yet it will undermine a major piece of public infrastructure. It is unsafe to proceed where the model has so abjectly failed
- 4) Greenhouse gas emissions: this issue is not addressed in a manner acceptable to any scientifically literate public authority or member of the public in 2012
- 5) Air Quality and Noise Monitoring: This proposal does not address the valid concerns of the immediate neighbourhood.
- 6) Traffic: GNRE disavow their responsibilities in this matter publicly and fail to properly address this in the development application.

The manifest failings of the proposal are evident on a cursory appraisal of the documents. Much that is required is simply not there, much of what is presented is biased or just plain wrong and then there is the material that is simply not there which is referred to remarkably as “approved” in anticipation even of its drafting let alone submission.

As a member of the public validly concerned with this proposal, I trust that you will now dismiss this application from any further consideration pending completion and place any resubmitted properly constructed application open for public scrutiny and comment prior to proceeding with any assessment for approval.

Yours Faithfully

Alison Edwards
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