

GUJARAT NRE 1 Application for s75W Modification to MP 10_0046 Preliminary Works Project - Longwalls 4 & %, Maingates 6-8

Application MP 10_0046 - MOD1

Comments on this Application by Dr Ann Young

August 2012

by email to Dept of Planning and Infrastructure 23-08-2012

Because this is a limited proposal that has been subject to revision in response to agency concerns, and because the subsidence expected will be lower than in most parts of the Southern Coalfield, I have only a few comments to make.

Swamps

Only one swamp CCHS3 (3.5 ha) will be undermined directly and the EA argues that LW5 has been reduced to minimise impact on this swamp. Another larger swamp CRHS1 (11.4 ha) lies immediately south of the longwalls and CCHS4 (1.8 ha) lies on the western margin. All these are recorded as having 'special significance status' under DECCW 2011 draft guidelines on upland swamps.

Appendix I comments that tensile and compressive strains will be insufficient to cause bedrock cracking in CRHS1 and the review in Appendix E does not dispute this. Certainly subsidence estimates (total, tilt, strain etc) are lower than in many other parts of the Southern Coalfield.

Given that there are 6 piezometers for which monitoring is available since late 2009, some detail of those monitoring results and the locations of the piezometers would have been helpful. The EA comments briefly that levels fluctuate between 'no standing water after extended dry periods to approximately 1.8m below ground surface'. This suggests to me that they are in large and already damaged swamps, as usually the water table would be close to the surface and in small swamps, sediment depth is much shallower than 1.8m. The only locations I can find are in Appendix E as a set of grid references. I accept that the likelihood of damage to the largest swamps CRHS1 is slight. All 3 swamps should be monitored, and a control swamp, to allow the impacts of the mining to be established and to provide data to inform future assessment of possible impacts in Wonga West.

Timing

The Application covers mining operations that are current. This may be partly a consequence of changing regulatory regime, but if adaptive management is to be implemented in the Southern Coalfield, these 'last minute' applications must cease. There should be an adequate lead time for proposals to be considered, and for monitoring results from previous areas to be assessed, before applications for new areas of mining are due to start. It is not acceptable for the approval process to be influenced by the brinksmanship that characterises this and some other proposals in the Southern Coalfield.

Thank you for the opportunity to read and comment on this proposal

Ann Young

23rd August 2012