

4 July 2019

NSW Department of Planning & Environment
Major Projects Team
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Subject: SSD-5465-Mod-3
Modification 3 Chain Valley Colliery (MOD 3)
LAKE MACQUARIE NSW

Lake Macquarie City Council provides the following correspondence in response to the Department of Planning's request for advice (dated 17 June 2019) in relation to the above application.

Council officers have prepared this submission on behalf of Council. The concerns expressed in the attached Schedule are therefore the collective views of Council officers

Summary of Proposal

Delta Coal is seeking to modify SSD-5465 pursuant to Section 4.55(1A) of the EP&A Act to allow for:

- the transport of product coal from Chain Valley Colliery (CVC) to Mannering Colliery (MC) via the approved underground linkage between the two operations at a rate up to the annual production level approved under SSD-5465, as modified, which is currently 2.1 million tonnes per annum (Mtpa). The current approved rate of product coal transfer from CVC to MC is 1.3 Mtpa; and
- a change in the definition of 'first workings' in SSD-5465 to allow the broader use of bord and pillar mining methods within the approved consent boundary.

Recommendations

Council supports the proposed change to transport coal via the underground linkage instead of the current overground arrangements.

Council has no objection to the change to the definition of "first workings" subject to negligible (<20mm) subsidence in any subsidence zone.

Mine Subsidence

Clarity is sought with respect to the proposal: Section 1.3 describes the proposal (as copied in the summary above), but Table 2.1 includes the proposal to extract pillars. It is Council's understanding that pillar extraction is a secondary workings method that has increased subsidence above that described in the statement.

Where and when additional subsidence impact is to be approved above negligible levels, Council requests that the potential impact on foreshore erosion as a result of changes to wave action arising from subsidence of the lake bed is assessed, and that an ongoing monitoring programs for foreshore erosion and seagrass impacts are established. The monitoring programs should be prepared in consultation with Lake Macquarie City Council.

Greenhouse Gas Emissions Reduction Targets

Lake Macquarie City Council's adopted Environmental Sustainability Action Plan 2014-2023 includes a city-wide target of 3% per annum reduction in greenhouse gas emissions. Council requests the assessment consider how the proposal contributes to this reduction target.

Impacts of Climate Change

Extraction and use of coal has been found to significantly affect climate and biodiversity (<https://www.ipcc.ch/sr15/>). Council requests that consideration is given to the project's contribution to the impact on flora and fauna as a result of climate change caused by the broader coal and coal power industries, and where this proposal may fit within a plan to limit the impacts of anthropogenic climate change. Specifically, it is recommended that contributory industries, such as coal mining, are required to participate in carbon offset schemes.

Other Considerations

The following elements were considered by Council and were not deemed to have any additional impact to Lake Macquarie City, its residents or environment:

- Aboriginal and European Heritage
- Air Quality
- Noise
- Integrated Planning
- Lake Macquarie Local Environment Plan
- Lake Macquarie Development Control Plan

The department is requested to consider these recommendations in the assessment of the proposed modification.

Should you require further information, please contact the undersigned on 4921 0025 or by e-mail on gkeech@lakemac.nsw.gov.au.

Yours faithfully

A handwritten signature in black ink, appearing to read 'G. Keech', written in a cursive style.

Geoffrey Keech
Development Planner
Development Assessment and Certification