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3 Finns Rd
Menangle NSW 2568

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Objection to South 32's proposed Appin Mine Ventilation and Access Project- 345 Menangle Road, Menangle

Application Name: Bulli Seam Operations Project

Application No: MP08_0150-Mod-3

Applicant: Illawarra Coal Holdings Pty Ltd

Location: 345 Menangle Road, Menangle (Lot 20A DP 4450)

Dear Sir/Madam

The submission period is so small that it would seem the government and South 32 do not want people to be able to submit detailed objections to the project. South 32 has used multiple businesses to prepare their submission over many months, and we, the local directly affected residents, are only given two weeks to prepare our objections after reading various reports that total nearly 1000 pages.

There are several reasons for our objection to the project that will be detailed in this document. Our main concerns are not only the inconsistencies in the data provided, but the effect the project will have on the value of our home and the loss of quality of home life. These inconsistencies are the main concerns, detailing the affect to our property and lifestyle as well as value and salability of our property. The report prepared by Niche clearly states in the executive summary that the project is to "improve production efficiency" (page iii). It goes on to state other benefits, but obviously, this is the main reason for the project, at the cost to not only us but also my neighbors.

The main issues with the project, which we will go into detail are:

1. Noise
2. Pollution
3. Traffic
4. Infrastructure
5. Lifestyle
6. Property value

1.0 Noise

1.1 Traffic

In the report by Niche, in item 1.4.5.4, it states that the roads are "suitable for use by heavy vehicles." We would disagree with this in that the roads in the area are of substandard quality and many sections are full of potholes and patches. The increase in heavy traffic would make these roads even worse. The bends at Douglas Park are not suitable for articulated vehicles and

could potentially be the location for a serious head on crash. The Traffic Assessment Report on page 8 states that “there is a change in alignment with sharp curves” north on Camden Street (its Camden Road). How can these roads be suitable for such an increase in cars and heavy vehicles? This section of road already experiences a high level of vehicle accidents and time was not available for us to research details of the accident rate.

1.1.1 Vehicle noise at change of shift

During the week there is a shift change at around 11pm. Thus, there will be 90 cars arriving between 9pm and 10pm, and 90 cars leaving after the shift change, as per table 2.3 of the Traffic Assessment Report and under paragraph 4.2 of the same report. The current traffic at this time of the night on Menangle Road is less than 6 per hour. The report details increase in traffic as a small percentage, for the total cars per day but fails to mention the intense increase in traffic at this time of the night. This is the same for weekend shifts, but at around 6am. As most vehicles will leave and head south, the traffic noise in the quiet times of the day will cause sleep disturbances of the neighbors as the cars must accelerate up the road incline from the site and around the bend at the Finns Road intersection.

1.1.2 After hours HV traffic e.g. concrete trucks.

The Traffic Assessment Report in paragraph 2.2.6, that the concrete trucks will deliver concrete at all hours, including night time, but as Finns Road has a 15T load limit, they will travel through the quiet and peaceful built up area of the Menangle township. The people surrounding this intersection will feel the effect of noise that they have never thought possible from these trucks as they accelerate out of the intersection at Station Street. There is also antidotal evidence from complaints generated by the residents of Durham Green Retirement Village complaining about the truck movements travelling along Menangle Road past their residences.

Given the number of trucks that currently have no regard for the 15t limit, we also believe that the concrete trucks will tend to use Finns Road as it's the easier and faster option. More noise for residences located along Finns Road and at the corner of Menangle Road including our residence as the trucks negotiate the turn to and from Menangle Road.

1.2 Construction work and timeline.

The Traffic Assessment Report states in the executive summary that vent shaft construction will commence in July 2022 and completed by June 2024. Table 2.1 of the same report has the shaft construction finishing by Dec 2024, an extra 6 months of construction noise and traffic. The summary also states that the infrastructure will take an additional 6-12 months starting July 2024, but table 2.1 has it starting July 2024 (no difference), but it won't be completed till 2026, some 12-18 months later. Again, further discrepancies with their data. Some of this is supported by the data in table 22 of the Noise and Vibration Assessment, and the same table is in conflict. What are we to believe?

1.2.1 Blasting Noise

The Noise and Vibration Assessment paragraph 6.2.1.2 states “, blast events occurring at night, could lead to sleep disturbance impacts”. 6.2.1.3 goes on to say that ground vibrations have the potential on both human comfort and structural integrity. Paragraph 6.2.4 states that the project is seeking approval for blasting to occur at any time, and there are no current guidelines or policies in Australia for this out of hours blasting. Thus, it seems that they will ‘give it a go’ and see what happens.

Paragraph 6.3 states that “A preliminary blasting impact assessment for the Project, prepared by

Prism Mining Pty Ltd, indicated that the blast design for the Project may use MIC in the range of 3-6 kilograms. For the purposes of this assessment, an MIC of 3.0 kilograms is assumed.” Table 32 of the report has the predicted overpressure exceeding the criterion. What would the numbers be if they use 6kg of MIC? Why didn’t they give us “worst case scenario” as they often like inform us that this is what they base their numbers on.

These numbers will have many of the surrounding residences being affected by the blasting. Given that the blasting can occur at any time, and given that the South 32 proposal is for sinking 2 shafts, this could occur every 12-16 hours (24-36hrs per shaft) as detailed in 6.4.1.1. How is this good for our health? What structural damage will this do to our homes?

1.2.2 Construction noise

There will be a lot of construction noise and added to this will be the temporary generators as detailed in 3.7.7.2 of the Niche report. These would produce a constant hum as we experienced when South 32 were operating the test drill rig, on top of all the other noise.

The data in Table 24 is very concerning. Every item/task on the list has a dBA exceeding 100, and many exceeding 110. That means that nearly all the time during construction there will be a piece of equipment creating noise in excess of 100dBA.

The issue with the dBA table that they fail to tell you is that the scale is not linear, it’s a logarithmic scale. “Zero decibels (0 dB) is the quietest sound audible to a healthy human ear. From there, every increase of 3 dB represents a doubling of sound intensity, or acoustic power.” (www.noisehelp.com).

Thus when you look at this table there is a lot of very loud machinery. The addition of these noises is not just simply adding them together, but they do increase the intensity. As a result, it will be a very noisy workplace. Bulk earthworks will be at 127dBA, shaft sinking at 125dBA. As a consequence we will be subject to very loud noises for a long time.

1.3 Operational Noise

In item 3.5.2 of the Niche report, it states that there could be a change to the volume of air or direction.

‘Depending on ventilation requirements and location of the longwall operations over the life of the Project, the existing ventilation shafts and access points may also switch from upcast to downcast ventilation shafts or be upgraded to higher air flow rates. Approval of upgrades/changes to existing ventilation shafts described above is being sought as part of the Project.’

There is no mention of this in any of the noise studies as to how this may affect the surrounding properties. What are they trying to hide?

The noise generated by the fans is provided by IMC. What is the data behind this number?

What is the fan speed/air volume for this number as the fans are controlled by VSD’s and thus can have their speed varied? What controls are in place to ensure this number is not exceeded?

What maintenance programs are in place to ensure the fans don’t become ‘noisy’ due to mechanical issues. Are there ongoing noise assessments to see if they comply?

2.0 Pollution

2.1 Air borne particles

The Air Quality Assessment has a lot of data throughout the report that we as uneducated residents (paragraph 2.3.1.3 of Niche Report stating we have a lower-than-average bachelor of education) must try and decipher. The residents of Menangle, other than the township, rely on water gathered from our rooftops for our water supply. The data might show acceptable limits

of dust, but it only takes one event to pollute our drinking water. We might not even know that it has happened, especially if this occurs at night.

2.2 Sewage/Grey water

In the report by Niche 1.4.5.4, regarding proximity to infrastructure, it does not mention sewerage. In Sydney Water's Growth Servicing Plan 2020-2025, accurate as of 10th March 2021, the area of the site is at the strategic planning stage. This means that "there is low certainty around delivery timeframes". The Menangle Village development will install a self-funded pumping station as Sydney Water won't have the facilities in place for the development. If a housing development of about 100 houses cannot get sewerage, how will the mine site? This will mean many more truck for many years removing wastewater. The sewage plant has no detail regarding odour control. Is it an open top tank system that would allow odours to be released? Why does the report not include details on this?

2.3 Spoil

The report has up to 5% of spoil to be removed from site. This amounts to 2341m³ that needs to be taken off-site. Many truckloads and dust being deposited on the landscape as they drive down the road, possibly polluting surrounding homes drinking water.

3.0 Traffic

As most of the mine workers who will enter the mine at the proposed Menangle Road access shaft currently enter the mine through Appin West off Douglas Park Drive, they will most likely travel to the Menangle Road site via Douglas Park Gorge. This road is not suitable for 180 cars per shift change as it's a one lane road predominantly used for local traffic, which floods often.

3.1 Construction Traffic

During construction, traffic will be up to 76 workers and 44 heavy vehicles as detailed in the Traffic Assessment Report paragraph 2.2.4. This paragraph also stated that concrete trucks will also operate 24/7 during the vent shaft construction.

3.2 Operational Traffic

Traffic Assessment Report paragraph 2.2.4 states that there will be 12 heavy vehicles per day. These trucks will predominantly head south (90%) as reported in 2.2.6.

Table 2.3 states that the number of personnel on site for shift 1 is 128, shift 2 is 90 totaling 218. Given that paragraph 2.2.6 states there is 212 car spaces, where will the other 6 or more people park. What about visitors or additional personnel required for for a specific task etc.?

In paragraph 4.6, it states that shift 1 will have 116 cars and shift 2 will have 82 cars. Why are the numbers different in the same report? Which is correct? If they cannot get this correct, how can we trust that the other details are correct?

This paragraph also states that there is parking for trucks and a loading area. We have been unable to locate this on any map of the site.

In the report's conclusion, it states that there are sufficient car spaces, which we cannot believe given that the data is not correct and that it is "not expected to have any negative impacts on other road users".

What about the extra noise to surrounding residents at times when the road is normally very quiet?

4.0 Infrastructure

4.1 Telecommunication

The report by Niche states that the site is “in close proximity to telecommunications”. (1.4.5.4). We and surrounding residences including Menangle Village residences have difficulty obtaining reliable NBN coverage. We are regularly reminded of this through our membership of the local Menangle RFS and often field complaints of the poor quality and often lack of internet service.

4.2 Water

In the report by Niche 1.4.5.4, regarding proximity to infrastructure. In Sydney Water’s Growth Servicing Plan 2020-2025, the area of the site is at the strategic planning stage. This means that “there is low certainty around delivery timeframes”.

There is town water available in Menangle, but what about getting it to the proposed Menangle Road site. More trucks for many years? The Niche report in paragraph 3.7.8 under the heading of Water Supply, concedes that Sydney water has no spare capacity in the Menangle system to supply the site. 100 people per shift having a shower before leaving amounts to many thousands of litres of water needed per day, resulting in many truckloads of water. The report states they would require on average 25kL per day.

4.3 Wastewater

This would have to be transported off site for the first few years until the site infrastructure was completed and the wastewater treatment plant operational. More trucks on the road.

5.0 Lifestyle

Our family moved to this area for the lifestyle it provided. Peace and quiet, not a mine access site. Over the next 5 years while the site is being constructed, we will have constant noise, blasting and traffic. This will have a negative effect our quality of life. Elderly parents of our family also live in an attached dwelling on our property which faces directly to the mine site. They moved here with us not only for the support that we provide, but also for the lifestyle. We are sure they won’t appreciate the additional noise generated by the extra traffic and general site noise.

Our three adult sons still live at home with us as they too enjoy the life that living on our semi-rural property provides, sitting outside on late afternoons around a fire without a sound except for the occasional passing car. Under the South 32 proposal, many cars and trucks and the constant 100+dBa from the mine site will continue to invade our quite enjoyment our family currently enjoy. This will all be shattered if the South 32 proposal is approved unconditionally.

6.0 Property Value

Over the past 8 years, our family have spent most of their spare time improving the property, for our personal enjoyment. We have improved the yards and gardens for our enjoyment, to sit around and relax in. This won’t be as enjoyable under the proposal. The South 32 proposal will substantially detract from the real value of our property. It’s this freedom that you move to a property like ours and those of our neighbors. Who would want to live next to a mine operating 24/7? South 32 will probably say that it’s not a mine, but mine access only. If we were looking at the area, it’s a mine site!

The 25m tower for the lift access will be obtrusive, and there is no way in the medium term to hide it. This will highlight the site, again detracting from property values.

We believe that we now have little chance of selling our property for its real value on today’s market if the South 32 proposal is approved to proceed.

An independent valuation should be obtained and provided by the applicant, prior to this application is approved, so that any decrease in property value can be compensated by the applicant.

6.1 Dilapidation Report

Given that South 32's proposal calls for blasting techniques be utilised through subterranean rock to sink the two shafts we believe that the applicant should be providing a dilapidation report for all neighbouring properties as a condition of the consent approval. Our family home is currently crack free, both internal and external. Our inground pool and surrounding concrete paving are also free of any damage. We also have retaining walls that maybe subject to damage if the proposed blasting techniques are adopted.

7.0 Conclusion

The reports supporting the proposed application are inconsistent and inaccurate. It is virtually impossible to make an informed decision when the information provided conflicts in the same report? How are we to believe all the numbers that are just done by modelling? Will these estimates be independently verified if the application gains approval?

What protections & or action will be put in place to protect the neighboring properties if these estimates are exceeded?

Why did the applicant choose to model the blasting explosion on minimum charge? It would seem on the surface that the applicant didn't like the numbers at maximum charge.

There is no water or sewerage available, and it is not a priority for Sydney Water in the 5-year plan. We locals are lucky to get the internet, yet the applicant say there is fibre optic along the road.

The reports are constructed to baffle the average person, using averaging, percentage change, pages and pages of graphs that unless explained are meaningless. They don't detail specific noise events like traffic at shift change at 11pm at night.

The report prepared by Niche clearly states in the executive summary that the project is to "improve production efficiency" (page iii). Why should their improved efficiencies and thus profit, come at the expense of our family and that of surrounding adjoining properties with their quality of life, property value and lifestyle.

Based on what we have provided above, this project must not gain consent approval at the detriment of the Menangle community.

It is our understanding that the South 32's mining activities can still progress quite safely at its current locations although they would no doubt argue that it will be more costly to extract their black gold.

Yours faithfully

Martin and Colleen Scott.