

Glendell Continued Operation SSD9349

&

Mt Owen Continued Operation Project mod4 SSD5850

Attention: Director Resource Assessments

NSW Department of Planning

We are lodging **an objection** to the Glendell Continuation project and Mt Owen continued operation on these grounds listed below.

1. Heritage European the relocation of Ravensworth Homestead Complex

The construction of the Ravensworth homestead in 1832 by Dr James Bowman and the 10,000 acres was called the Ravensworth Estate. The Ravensworth homestead and outer building are apart of the complex of a working colonial enterprise as a rural grazing industry. The Ravensworth estate has had several ownership changes and all documented history of the estate, the homestead has remained on its original foundations which signifies the importance of heritage value to local region and the state.

Glencore's options related to relocations of homestead to either Broke or another place in the Ravensworth area on Glencore land, would remove the heritage value of the Ravensworth Homestead complex and the possibility of causing extreme harm to the buildings themselves. The option of Broke would mean that the homestead could not be called Ravensworth Homestead complex as it is not located in the Ravensworth region but become just a building of no significance of heritage to local area.

The other option to relocate in another area owned by Glencore in the Ravensworth district would also remove the heritage value and more importantly the loss of place as referred to by Lucas Stapleton Johnson and the basic tenant of the Burra charter in the conservation of Australian Heritage. The Glencore option in the Ravensworth area has the potential of exposure related to environmental damage due to rainfall events.

Also on page 23 on appendix 23 refers to death of an aboriginal at the Ravensworth homestead complex via gunshot. This highlights the significance of the homestead to hostility between two cultures the indigenous and the European over land.

Where is Dr James Bowman remains laid to rest.

The death of Dr James Bowman is documented but the final resting place is unknown, so therefore leaves the mystery and that his final resting place could be at the homestead or somewhere on the estate or in the churchyard in Camberwell or further a field but hence the concern related to relocation of the Ravensworth homestead and the possibility of disturbing another part of our history of Ravensworth.

2. Aboriginal Heritage related to Ravensworth Estate

In relation to Ravensworth estate there is clearly documented reports of hostility between indigenous and the Europeans which resulted in the death. There is also report of hostility in the

Lillian Noble story of the Glennie's creek area which resulted in deaths of Europeans and the indigenous people.

So therefore the Ravensworth estate has been exposed to hostile interactions between two cultures which resulted in loss of life but these interactions rely on the written word of media of the time and reports documented by the law authority or educated people to record the time of the events or their perception of what happened but there is always doubt that prevails of the numbers which were lost related to the hostility or the case of not reporting a death of an indigenous. As previously discussed, we don't know where Dr Bowman is laid to rest so there is reasonable doubt related to the number of incidents that occurred and the numbers of deaths resulted related to hostile interactions and the actual initiator.

3. Final void

The fact there is going only one final void which will be a pit lake is a concern for the environment in relation to the impacts on the water network but no-where is there in the report on the cumulative impacts of final voids in the hunter region and the management of these voids in the future when mining is completed, the cost of monitoring, the cost of rehabilitation which will be required over the existence through erosion and environmental forces, the maintenance of fencing for the protection of human and fauna to enter the void related to health and safety. There is no report of the land value of the final void in the landform and the strategies for use of the final void and the surrounding landform or how they the proponent is going to ensure the area would become enterprise for employment in the future.

The fact is the cost of having the void outweighs the economic benefits of project is important to note on what the future generations will face of having over thirty final voids in the upper hunter nether alone the state as a toxic legacy of pit lakes which will cost them severely.

4. Air quality

The Air quality assessment in appendix 13 has used the reference to material related to acquisitions related Camberwell village and this highlights the area is significantly impacted related to pollution of number of elements, but fails to do a comprehensive cumulative impact beyond a couple of mines surrounding the project and therefore it inadequately highlights the true comprehensive cumulative impact related to pollution of the hunter valley.

Just because a village is in the acquisition zone does not mean the proponent has the right to cause harm and by their own omission the air quality is already in exceedance, so therefore the ability to mitigate is not achievable and if the environment continues to extreme droughts and the reliance of dams for water, this has potential to have a negative impact on the economy.

The fact the proponent has referenced reports from 2014 for the basis of the assessment highlights the failure to incorporate the impacts of climatic changes and the increase in pollution associated of the last two years but more importantly how a finite resource for life "water" has become a major issue as towns and communities dam levels become zero, how this impacts economy but importantly the hostility creates related to employment in other sectors.

The fact is the number of exceedances of PM10 in Camberwell and Singleton North West is continually increasing in the last three years, proves the problems related to pollution levels and exposure rate. The concern now is the continual exposure levels to exceedances on future health of the young and the community at large who should be held accountable, it should not be the tax

payer to foot the bill but the source of the hazard and that is the industry itself, as the proponent report states the levels will be exceeded.

The failure to incorporate the number of blast emissions per day in the hunter at accumulative level and annually on the air pollution or air quality.

The failure identify mental health impacts related to poor air quality and recommendation to stay home with air conditioning, causes isolation and possible social behavioural problems.

5. Water

Groundwater and surface water impacts related to the diversions of York's creek, Swamp Creek and Betty' creek on the ecosystems and the impacts this has on Bowmans creek pools and water flow.

The diversion of Swamp creek will reduce the catchment area as stated in the report and this will have a significant impact on the water network.

The proponent has stated the importance of the Greater Ravensworth area and tailing scheme, in which mine water is transfer between sites and also allows mines with larger storage capacity to hold mine water but what happens in a drought situation when there is insufficient water to meet demand of a project for mitigation etc, does this mean that this scheme can be used for fresh water transfer from other sites owned by Glencore or operated by Glencore to meet requirements, which is not stated in the information provided and how this impacts other business. Also the report failed to identify how much seepage water from the void will be removed a part of the mining process.

With the relocation of the Narama pipeline for the project approval and incorporating the GRATW to this area, the impacts this would have on the environment related to ecosystems.

The failure of the water report to identify climatic conditions related to water use, especially when ground water becomes depleted through continual removal for coal extraction and then the industry turns towards water storage from dams with high security licences and denies others the right for income, the use of the 2016 modelling for the water sharing plan has shown a number of scenarios but has failed to implement structures for water security for the hunter.

The case of Hunter Valley Operations water take of approx. 500 M/L a month from the hunter river in 2019 just proves the facts of the impacts on the groundwater systems when mining depletes this system and there is no recharge due to drought conditions that the industry then becomes totally reliant on stored water from the dams, this cause a flow on affect to others in the network of rights to water.

The water assessment must look at the cumulative impact on groundwater in the hunter region and the groundwater impacts related to the number of final voids the interaction between pit lakes and water quality, how this will impact surface water or more importantly the water in regulated systems for water uses, especially to include climatic conditions changes.

6. Social Impact Assessment

In relation to Table 5:4 related to mine approvals, which only looks at four applications, in which three were refused but failed to table the large number of modifications been approved and continued operations approved in the last couple of years. And the evidence of the number of approvals by the department of planning and PAC and IPCN significantly outweigh the refusals.

Also the social impact failed to identify the number of breaches the approved projects had and the consequences of these breaches in the hunter.

The survey related to the project on the phone was inappropriate, unfair and unjust, more importantly denied the right to make a point because it did not meet the tick in the box question, to the stage it became offensive to the person been interviewed.

In relation to the Community Consultative Committee engagement of the community there is no gauge or measure of the performance or related to the accuracy of the material presented. There is possible lack of understanding related to the formal complaint's procedure related to CCC but there is clear failure of departmental involvement in the Community Consultative committee at meetings and failure to assess the performance.

Conclusion

The negative impacts outweigh the positives related to the project on numerous areas, therefore the project should be rejected.

More importantly Ravensworth Homestead Complex must not be relocated, this is our heritage no matter what culture you represent.