

Submission to NSW Planning Portal on the above Proposal

I **OBJECT** to the proposal for the following reasons:

- The impact on the environment and community of transporting 1.2 Mtpa of coal between Myuna Colliary and CES by way of public roads is an extraordinary departure from the conditions of the existing approval.

Since the original approval of the project and its adoption as a State Significant Development, the Conditions 6 and 7 of Schedule 2 of MP 10-080 have **Prohibited the transport of coal on public roads, and required that all coal transported from the site will be on covered conveyor.** These conditions were undoubtedly included, and agreed to by the proposer, in recognition of the impact that transport of large quantities of coal by truck on public roads would have on:

- **Safety of All Road Users:**

- The intersection of Wangi Point Road / Wangi Road is extremely unsafe for the entrance and exit of loaded and unloaded trucks to a main distributor road with 90 kmph limit with imminent steep incline to the north.
- Donnelly Road / Wangi Road is a particularly difficult T intersection where northbound drivers are taking advantage of the first overtaking lane for ages, exacerbated by the impact of a truck slowly accelerating up to speed once every 3 or 6 minutes chocking up one lane.
- Dorrington Road / Wangi Road has a roundabout to assist, but there is a very short merge lane heading north which I have often seen cause confusion for less experienced or inattentive drivers.
- Wangi Road / Wilton Road is going to be very challenging for trucks entering southbound with a very short merge lane to get up to speed.

- **Particulate Matter Emissions:**

- Loading and unloading 1.2Mtpa of coal to and from trucks into the Emergency Coal Stockpile, then mixing using front end loaders, in open air at Myuna Pit Top, then loading and unloading again into the Reclaiming plant and or into the conveyor bins results in a massive increase in particulate matter released into the air. These activities are all in addition to the current material handling, and are proposed to be conducted 24 / 7.
- The amount of coal spread along the verge of the existing Awaba and Coorangbong Private Haul roads show that strict regulation does not stop coal lumps and particles falling from trucks.

- **Noise and Water Pollution:**

- All this additional material handling is associated with additional noise and increased water us, treatment and disposal.

The proponent argues that these additional stresses on the health, safety and amenity of the community will have only minimal environmental impact, are necessary to support the ongoing and efficient operation of the Eraring Power Station, and could risk ongoing employment of the Myuna workforce.

The proponent rejected the alternative of investing in additional plant or processes to upgrade the coal at Myuna, arguing ironically that the environmental cost would be too high.

The option of using the existing covered conveyor and blending onsite at the Eraring power station was rejected by Origin because it “did not align with their preferred coal delivery strategy”.

One could reasonably interpret this as distancing themselves from the environmental impact of blending coal.

When faced with some difficulties with the quality of coal currently available from Myuna the proponents appear to be playing the State Significant Development card to pass the problem onto the community. Not just to overcome an identified short term problem, but an open ended arrangement that could last the remainder of Myuna,s life.

Where was the community consultation, the public meetings, the open-handed discussions about the problem and potential solutions?

State Significant Development declaration sets a high level of expectation that the proprietor will exercise effective management of environmental issues and pursue continued improvements in environmental performance.

What sort of an outcome in Australia 2020 is a cavalcade of trucks carrying coal in ever diminishing circles between the elements of Centennial’s empire using public roads?

The costs must be astronomical, and not only in dollars.

#### **RECOMMENDATION:**

The proposal should be rejected.

Centennial should be told to get together with its industry partners and forge innovative solutions that provide cost effective support for the electricity industry, ongoing jobs for its skilled people and respect for the Environment.