

NSW Planning and Assessment Commission Level 3, 201 Elizabeth Street SYDNEY NSW 2000

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re: Submission on the WALLARAH 2 COAL PROJECT (SSD 4974)

LOSS OF FRESH WATER SUPPLIES

The Central Coast fresh water supplies are still under threat from the Wallarah 2 proposal. Current extreme drought conditions indicate the need to protect the valleys from such a long term proposal resulting in aquifer interference on a large and permanent scale and admission of permanent water loss within the system as described in the Department of Planning's approval. The Central Coast Compensatory Water Arrangement with Wallarah 2 is not yet formulated but must be before any final approval of the project is forthcoming following a Planning and Assessment Commission (PAC) determination. Current suggestions to treat mine water and returning it to the pump pool is not viable and does not guarantee acceptable water treatment or sufficient volume in all climatic conditions. This fact, coupled with the knowledge that you cannot treat and return 100% of the water captured coming into the mine will result in a negative impact on the water supply. The cost of building the water treatment plant and infrastructure to pipe the water to the pump pool equates to many millions of dollars and no doubt in the same cost vicinity of \$150 Million without the cost of the piping process from Buttonderry back to the catchment. The mining company would not want to spend that sort of money to treat water. AIR POLLUTION, NOISE and PUBLIC HEALTH

Dust (pm10 and pm2.5 particles) from coal movement and stockpile are not effectively addressed by the Department of Planning. The suburbs of Blue Haven, Wye and surrounds and the effect on the movement of uncovered coal wagons on all communities along the main rail corridor to Newcastle are in real danger of major long term health problems. The miner's own EIS Consultant's report quotes clearly....

“..that short term exposure to PM is likely to be causally associated with mortality,...hospitalisation and emergency department visits for cardiopulmonary diseases, increased respiratory symptoms, decreased lung function, and physiological changes or biomarkers for cardiac changes” (Pope and Dockery,2006) in (PAE Holmes report for Wallarah 2 April 2013.) Dust suppression from water sprays on the stockpile is ineffective unless the water is mixed with foam so that dust particles adhere to the water. The cost over the long term period of the proposed mine would be prohibitive. The citrus-based foam concentrate is highly expensive and it is unlikely that Wallarah 2 would invest in this measure.

The noise generated by the constant 24-hour 7 day movement of coal trains and conveyor and loader will be a huge impost on families within a stone throw of the loader site, affecting many streets within the Blue Haven precinct and also many homes in the Wye subdivision near the railway. Schools and pre-schools in this region also should not be able to ask to bear the consequences of constant dust intrusion and noise next to their suburb. As well, the planned new subdivision areas proposed by Darkinjung ALC nearby, would be greatly impacted and would render the value of those sites undesirable.

SUBSIDENCE

Subsidence in the Hue Hue subdivisions and the valley region affecting 245 properties plus further infrastructure is not adequately addressed. The proponent has not established an extraction plan that is confident that subsidence is kept to a minimum. There is still confusion whether remaining pillars between the longwall panels to be extracted are to collapse (yield) or not. This affects the type of subsidence expected. The community has no confidence in being able to protect their properties from unscheduled levels of subsidence due to this major and seemingly experimental mine plan. Wallarah 2 in fact state that... "the predicated levels of subsidence for the Project are one and a half to two times higher than predicated levels...in the Newcastle and South Coast regions.." (Walarah 2 response to PAC 2014). So-called "Second Workings" of the coal seams, which are embodied in the Director-General's requirements are not described in any form or in fact understood by the general public. Do Second Workings which normally applies to the older bord and pillar method of traditional underground mining mean that the pillars left after longwall extraction are then subject to mining? The Planning and Assessment Commission need to explain what the method of extraction of coal for Wallarah 2 really means. They have to rule this method either in or out so that subsidence levels can be estimated more accurately.

SALTY BRINE DSIPOSAL

So called treated salty brine disposal into the Wallarah Creek system and eventually into Budgewoi Lake, as suggested in the EIS consultants report is destined to be an environmental disaster. Even scarier is the 5280 cubic metres per annum of semi solid brine extracted from the workings to be stored for at least the first 14 years of the 28 year operation present huge environmental risks underground. We assume that over this period of time we are looking at well beyond the storage of 75,000 cubic metres of this brine concentrate extracted from the mine seams. It is this type of uncontrollable environmental disaster that has been demonstrated worldwide to be a permanent legacy of the mining industry for future generations to deal with. There is precious little explanation of this storage method and should be detailed and explained to the public by the Planning and Assessment Commission well before any thought of approval.

CONSULTATION

The Department of Planning merely accepts the submission by Wallarah 2 that public consultation with those affected by the mine has been extensive. This is simply an out and out lie. The company has not held an open public meeting to discuss the merits of their proposal . They have held open days where people are invited on a one to one basis by pre booking a consultation, and after 10 years very recently invited people to attend displays of the mine proposal. Never have they held an open public meeting on dust and health issues in the areas to be affected. Since their control of the company in 2006 they have never consulted or attempted to hold a public meeting with the 245 landholders to be affected by subsidence to discuss the extent of damage likely to occur to homes or the effects on the landforms particularly in the valley region. By not consulting Wallarah 2 have forfeited their right to claim a Social Licence to Operate under the normal established terms of major developments.

FINALLY

The community of the Central Coast has no confidence in the State Government in holding to its responsibility of due process in determining the costs and benefits of coal mining in NSW. In recent years the State Liberal Government actively aided in the bypassing of the State's judicial system following Court cases which determined against mine expansion at Warkworth open cut mine. The

previous O'Farrell Liberal Government removed the Merit Rights of Appeal in the Land and Environment Court from all mine affected communities in NSW thus stranding communities from automatic legal recourse . In the last days of this October the NSW Berejiklian Government passed a law to overrule the Court of Appeal's decision that the Springvale Mine was unlawfully approved, which is contaminating Sydney's water supply, by removing protection of the State's most crucial fresh water catchment.

Subsequently in the Wallarah 2 EIS all the statements of "safeguards" and "monitoring" to check environmental contamination amount to nothing as the State Government, and therefore its agents or Departments, now has clearly indicated it does not intend to uphold the rigour of legal protective measures contained in the EIS. On that basis the Planning and Assessment Commission must now reject this mine proposal by enacting the Precautionary Principle as embodied in State legal procedure.

The Commission are reminded of the 685 submissions already submitted on this application.

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