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The Director
Planning Services
Dept of Planning and Environment
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SYDNEY 2001

Re: Wallarah 2 Coal Project SSD 4974 – Amended Development Application

I wish to lodge my objection to the abovementioned amendment to the proposed coal mine in the Dooralong and Yarramalong valleys. I also confirm my objection to the original development application of 2013 for this same mine - copy of my submission dated 17th June 2013 is attached. The original development application has not had a final determination – therefore this amendment needs to be considered in conjunction with the original D/A.

This proposed coal mine by Wyong Areas Coal Joint Venture (Kores) is in the water catchment for the Central Coast – taking in both Wyong and Gosford local government areas (now the Central Coast Council area). This project has the potential to severely impact this whole region – a rapidly expanding residential area.

The applicant's executive summary states:

“The amendment involves changes to the proposed coal transportation infrastructure and the re-alignment of a sewer connection. All other aspects of the Project will remain as previously proposed,.....” As stated by the applicant, nothing else about their application has changed. This means no change to the negative impact on the region's water supply, problems caused by subsidence to 245 homes and some public and private infrastructure, predicted increased potential flood levels of the valleys, air quality around the proposed mining facility, noise impacts, etc.

Ground and Surface Water

Walarah 2 Coal Project's newsletter (# 30 - July 2016) justifies the Amendment as having a 'positive environmental outcome and economic benefits'. Whilst the proposed coal transportation infrastructure is slightly smaller than in the original D/A – it is insignificant in the context of the whole project. The environmental impacts to the water catchment do not change – the very real potential of the loss of water in the river system remains unchanged. I remind you again this river system where the mine is proposed is a proclaimed water catchment contributing to the Central Coast's water supply.

The consultant's (MER) suggestion is that "after more than 500 years, water levels in the workings (in the Jilliby Creek/Wong creek catchment) are predicted to have recovered (and not be of concern)". This is at least 25 generations. This should be a major concern and not dismissed as inconsequential.

Elsewhere in the State where mining has been carried out near river systems, water has disappeared through cracks in the river and/or creek beds caused by subsidence. The subsidence affects both surface and ground water. These fractures are very difficult to repair and there have been numerous instances where successful remediation has not been achieved.

Environmental Rehabilitation

The exploration lease of the Wallarah 2 Coal project is held by Wyong Coal Pty Limited. A search on the Australian Securities & Investments Commission of Wyong Coal shows that Kores Australia Pty Limited is the ultimate holding company (with 329 of the 400 shares issued). This company (Wyong Coal P/L) has paid up shares of \$400.00. Who will pay the cost of repairing the environmental damage that will occur if this coal mine goes ahead – a company with a paid up capital of \$400.00 will certainly not be able to do this. The cost will fall back onto the public purse.

Coal Dust

Kores in their D/A state that the facility will be over 1km from houses in Blue Haven. However, what they have failed to include is that the conveyor belt will be just 200 metres from Blue Haven township and 400 metres from Wyee township. The coal loader will be 700-800 metres from Wyee. The new loading facility will be 300 metres from the Darkinjung approved housing development. This poses a very real health risk to the residents in these residential areas from coal dust.

The health problems associated with the fine PM₁₀ particles is well documented with the coal industry being one of the worst polluters of these particles. Coal dust is a carcinogen. The financial cost of health problems (as a result of exposure to air-borne coal dust particles) such as respiratory illnesses, cancer, heart attack and stroke will be borne by the State Government – not the coal company. This cost should be offset against any potential royalties from the mining operation. Has this been considered?

In his submission to the original application, Dr Peter Lewis, Area Director of Public Health of North Sydney and the Central Coast, outlined the greater risk to children and health sufferers from coal dust.

There are no safe levels of exposure to fine particle pollution. If this mine were to proceed, it will be condemning thousands of people to serious potential health problems.

Subsidence

Predicted levels of subsidence to some 245 homes and their infrastructure with 86 of these homes subsiding from one metre to 2.3 metres. The prediction for the valley floor is up to

1.8 metres and an incredible 2.6 metres near the Jilliby Conservation area. A principal finding of the PAC was there is 'inevitable uncertainty concerning subsidence predictions'.

The Mines Subsidence Board (MSB) has a poor record of paying affected property owners adequate compensation with the vast majority of claims being refused. The original application claims that property owners are protected by the MSB but this has been shown not to be the case.

PAC Report of 2013

The Planning Assessment Commission of 2013 concluded that "In considering the merits of the project as a whole the Commission has found that the benefits claimed for the project by the Proponent are not credible." The Commission was also very aware of water-related impacts.

Conclusion

The Central Coast water catchment supply in the Wyong valleys is at real risk of destruction due to subsidence. The Central Coast is a rapidly expanding area for both residential and industry – both of which need a reliable water supply – certainly not one that is compromised by degradation through coal mining.

The health risks associated with air-borne coal dust cannot be under-estimated both in terms of human health and financial burden on the government's health care system.

This amended development application, together with the original development application, should be rejected in its entirety. This amended application does nothing to address any of the impacts of the proposed coal mine – it only worsens the problems associated with coal dust.

The precautionary principle should be adopted. Therefore, this Amendment and the whole project should be rejected.

Yours faithfully

Sandra Norman