

Bev Smiles
[REDACTED] Rd
Wollar 2850

Monday 12 November 2018

Mr Gordon Kirkby
Independent Planning Commission
3/201 Elizabeth St
Sydney NSW 2000

Objection to Bylong Coal Project
Follow up information from site tour on Tuesday 6 November 2018

Dear Sir,

Thank you for the invitation to attend the tour of the proposed Bylong Coal Project as a representative of Wollar Progress Association. I would like to make the following observations on some critical issues:

1. BSAL mapping

While travelling in the individual vehicles to Telstra Hill I learnt that the Biophysical Strategic Agricultural Land (BSAL), as identified by posts in the ground during the site tour, had not been ground-truthed or verified in detail on site.

The impression I received was that KEPCO consultants relied on the course mapping undertaken during the Gateway process and that no further on ground verification occurred.

Areas of BSAL, that clearly meet the definition, have been left out of the designated areas identified by the white posts.

I was also quite concerned by the very negative, and nearly derogative comments made by KEPCO consultants about BSAL during the tour.

This is a critical issue that must be addressed before a decision on the merit of the Bylong Coal Project can be made. This project proposes to disturb a larger area of BSAL, even with the poor on-ground verification, than any coal mining proposal in NSW.

It is imperative that the full extent of BSAL land to be impacted by the project is properly identified in a transparent and rigorous manner before a decision can be made.

2. Tarwyn Park and NSF

The excellent work being carried out to restore Tarwyn Park homestead is a responsibility of the owner, and should not be conditional to the coal project being approved.

The predicted drawdown on the area of Tarwyn Park where Natural Sequence Farming (NSF) was first established will destroy the intent of the land management project. This issue was not discussed during the tour.

Part of the NSF management is to restrict stock access from the floodplain, harvest the fodder and feed it out on higher ground. KEPCO land managers have not maintained this practise and did not describe it as a key function of NSF during the tour. The community has concerns that Tarwyn Park is no longer being managed under the principles of NSF.

The loss of ground water storage due to mining drawdown will destroy the productivity of the area developed under NSF processes.

3. Biodiversity Offsets

During the tour we travelled through Biodiversity Offset Area 5 which is the largest proposed offset in the project. This area is to be impacted by subsidence and has signs of erosion and vegetation disturbance. The proposal is for this area to be secured for protection after mining is completed.

There was no discussion during the tour whether further surface disturbance through the construction of ventilation fans, access roads, pumping infrastructure etc above the underground mine would occur in the offset area.

It is imperative that the likely impacts of subsidence and above ground infrastructure be fully understood before this offset could be considered to meet the requirements.

The proposed conditions of approval allow for further disturbance to occur on this site without any clear understanding of the extent because this has not been assessed.

I do not consider that Condition 36 Schedule 4 offers any certainty in regard to the suitability of Area 5 as an offset.

Other Issues relating to Bylong Coal Project.

I consider that the quality of the assessment for this project in a new green field site is very poor and does not provide the necessary detail to inform a determination based on the project merit.

The assessment of water impacts, social impacts and transport impacts is particularly poor. Further information on these matters is required before a determination can be made.

I do not accept that the proposed conditions of approval are strict or capable of managing the severity of the impacts of the project. There are numerous caveats in the conditions that leave them open to change at the discretion of the Secretary of Planning and Environment.

This provides no certainty that the high level of risk associated with the project will be adequately regulated.

Because the community has been denied our democratic right to appeal the merit of this project in regard to the poor quality of its assessment, it is imperative that the Commission seeks the necessary additional technical advice to inform the final determination.

This includes:

- A full, independent review of all assumptions in water modelling
- Verification of BSAL mapping
- Assessment of traffic movement constraints caused by over-sized, over mass vehicles on the whole length of the Wollar Road and full assessment of road condition
- Assessment of the condition and capacity of the Sandy Hollow Railway Line
- Cumulative impact assessment on loss of biodiversity, loss of Aboriginal cultural heritage, social impacts and water impacts.

As a near neighbour to this fourth large coal mine project in the region, I have not been contacted by KEPCO during the assessment process, other than to participate in an early meeting with the consultants assessing social impact. The impact of this proposal on my family and the community of Wollar has not been recognized in any of the reports or draft management plans.

Yours faithfully

A solid black rectangular box used to redact the signature of the sender.

Bev Smiles