

27 October 2020

I'm writing to express my strong opposition to the proposed Russel Vale Underground Coal Mine Expansion Project (MP09_0013).

While I wish to note the significant environmental issues raised by other submissions, I will instead focus my submission on the application's impact on public amenity and access to the Illawarra escarpment. In short: by preventing access to the *Lower Escarpment Trail* between Bulli and Balgownie, this application severs public access to a natural asset of huge social and economic potential. An approval would risk a huge long-term opportunity and ignores the stark reality that mining in this location is no longer economically feasible.

As a resident of Thirroul and a regular user of the *Lower Escarpment Trail* I wish to raise the following points in support of this argument:

1. The Illawarra escarpment is unique in its beauty, proximity urban areas and access to infrastructure

I moved to Thirroul in 2016 from Sydney for the beach and transport links to the Sydney CBD. As an outdoor enthusiast, from day-one I have been blown-away by the unique natural beauty of the Illawarra escarpment. I am not aware of any other spot in Australia where mountain terrain collides within metres of the sea, close to an urban centre, with strong links to transport and other urban infrastructure.

These are the fundamentals that should set the escarpment up for broad public enjoyment – walkers, hikers, trail runners, rock climbers, bike riders, view enthusiasts and other eco tourists. Yet what has surprised me the most is that access to this significant public asset is limited, and in the section linked to this application, it is locked. This is a huge missed opportunity.

2. This is a public asset that is in high demand, despite being locked up

Despite the gates and the signs, the *Lower Escarpment Trail* and its natural beauty has been rightfully reclaimed by the public. Any given Saturday morning will see streams of people enjoying this spectacular wilderness for what it was created for.

The running application Strava captures GPS movements of runners in this section of the escarpment, demonstrating significant public usage - comparable to sections of the Royal National Park coastal trail. And this is just the runners. But all of these people are breaking the law. A recent flood of increased signage threatening prosecution and security has made this abundantly clear.

In a post-COVID world where access to outdoor space has become increasingly important, and increasingly scarce (see the number of golf courses being converted into parks in Sydney), this application would take away public ownership of more than six kilometres of natural, accessible assets.

3. The escarpment has an economic potential that far outweighs the economic justification for this expansion

Mountain recreation and ecotourism is booming all over the world, Australia is no exception. Ski towns like Thredbo in NSW and Bright in Victoria have been transitioning over the last decade, becoming far busier in the summer than the winter. Places like Katoomba now reap extraordinary benefit from regular hikers, runners and rock climbers all year round, as well as from larger running festivals like Ultra Trail Australia – one of the largest tourist events on the Katoomba calendar.

The Illawarra escarpment is comparable and in many ways superior to all of these locations. And it is starting from an extraordinarily low base in terms of the current economic benefit gained from these recreational uses. With minimal regulation and maintenance – something as small as putting signage up that encourages access – we could create a destination that is highly sought-after by hikers, runners, climbers and riders. A destination that is highly accessible, given its proximity to Sydney and public transport links. And a destination that generates extraordinary benefit for local businesses and the people of the Illawarra.

And there is already a plan in place that demonstrates how it could be done.

4. There is a management plan that is ready to be implemented that precedes this application

The National Parks and Wildlife Service's Illawarra Escarpment Plan of Management of 2018 provides the roadmap for this vision, demonstrating that through regulation, maintenance and improved access, the escarpment has extraordinary social and economic potential.

Yet it also acknowledges that access to this section of the escarpment represents a significant barrier for implementation. It argues that discontinuity across the escarpment limits any ecotourism value that might be gained from the plan's implementation.

An approval of this application would put the nail in the coffin of this Management Plan, locking access to the area for decades to come.

5. Once it's locked, it's gone. Even if the company goes broke, again.

While I appreciate and respect the Illawarra's connection to coal mining, this mine is no longer viable. The notion that an expansion of this size could override the most basic of feasibility indicators goes far-beyond wishful thinking.

This is a mine that hasn't operated, or supported any jobs, in more than five years. It is a billion dollars in debt and is reliant on private equity to remain afloat because there is no financial institution in Australia that will risk funding a major coal mine expansions of this term. Their profitability half-life of 37 years is deemed far too risky because the future of this industry, whether for coking or thermal purposes, is not deemed likely to survive 37 years. This application is very clearly an effort to refinance an asset, and it's debt, that is no longer profitable.

Even if they never proceed with the expansion. Even if they go broke, again. An approval of this expansion risks locking up access to a social asset for decades to come.

We need to consider how much faith we have in the promises of private international equity. And we must balance this against the risk of locking-up access to a public asset of significant and untapped social and economy value.

Thank you for the opportunity to provide this submission. And I urge you once again to think carefully about the short and long term costs of approving this application.

Kind regards,

Llew Gartrell

Thirroul resident

