

SUBMISSION TO PLANNING ASSESSMENT COMMISSION HEARING - 14 /15 NOVEMBER 2017

ROCKY HILL COAL PROJECT – SSD 5156

My name is Jeffrey Kite and I'm a retired water resources engineer. I'm President of the Gloucester Environment Group and a member of Groundswell Gloucester. However, this is my personal submission.

The Department of Planning and Environment (the Department) has released its State Significant Development Assessment (SSDA) for the Rocky Hill Coal Project (RHCP) and has recommended that that the project should not be proceed.

I strongly support the Department's recommendation that the Rocky Hill mine should not proceed and request that the PAC come to this decision and not approve this project.

The proximity of the proposed mine to the town of Gloucester is the over-riding problem with this project. This has also been strongly stated by the Department and the Midcoast Shire Council. The issues of noise, dust, blasting fumes and aesthetics alone are more than enough to refuse this development.

However, I believe that the Department has understated some of the major impacts of the development.

With respect to aesthetics, the beauty of the Gloucester valley is largely due to the very prominent locations of the Mograni and the Bucketts and the fact that four rivers meet at the northern end of the valley. This beauty is the primary reason why Gloucester is so popular for tourism and for "tree-changers". But it is also the primary reason why Aboriginal Heritage is a critical issue and this has not been properly recognised by the Department. Just like people of European descent love this place, Aboriginal people have loved this place for centuries.

However, I believe that for Aboriginal people, there is a much deeper cultural and spiritual connection to the land and water that I think non-Aboriginal people will never really understand. The Department has not even skimmed the surface of the critical nature of this cultural and spiritual connection. This is a very major oversight of the assessment.

The Department has highlighted some of GRL's so-called best practice. OK, refilling the void would seem much better than other options. But to suggest that GRL's proposal of a "rehabilitated final landform that mimics the original landscape in terms of micro-relief and drainage network density" is achievable best practice, is highly questionable. Major differential settlement within the void is inevitable. Settlement rates will depend on how compacted the refill is as well as other variables like rainfall intensity and soil saturation during and after refilling.

Establishing a stable and graded surface drainage network is likely to take decades. Depressions are likely to become saline swamps. Gloucester Resources Limited (GRL) apparently considers that water will "continue to migrate vertically" rather than discharge into the surface or groundwater system. It is inevitable that there will be a discharge of saline groundwater which must at some point drain into the Avon River.

At this very late stage in the assessment process, two other key Government agencies still have not been provided with sufficient information by GRL on a number of major issues. Firstly, for example,

DPI-Water states that GRL still has not provided sufficient certainty that it has guaranteed access to the water entitlements required for the project to proceed.

And secondly the EPA has a major concern that GRL still has not provided an assurance that there are practical disposal options for the huge quantities of brine that will be produced. On this latter point, GRL has also not addressed the disposal options for other potentially toxic waste streams that must emanate from other water treatment processes.

GRL has had numerous opportunities to resolve these issues over the last 4 years since the previous EIS was submitted. At some time, GRL needs to be told that "enough is enough". I strongly suggest that this is the right time.

One final reason why the project must be refused relates to regulation. The EPA makes the comment that to regulate noise, there would need to be "multiple layers of controls" which "may not be practical to implement....". I think that this is likely to apply to many other areas like water, dust, blasting and particularly social impacts such as health issues. Self-regulation is not an option for this project and it is most unlikely, judging by problems with regulation in other areas, that the Government will have the resources to provide the level of monitoring and inspection that it would be essential to meet what would have to be a very highly complex set of conditions.

In conclusion, I recommend that the Commission do not approve this development.

A handwritten signature in black ink, appearing to read 'Jm Kite', written in a cursive style.

Jeffrey Kite

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