



KEEP LAKE MACQUARIE CLEAN

February 23rd, 2026

(Ref,CHAIN VALLEY submissionF1.docx)

c/- James Horn

eMail: [REDACTED]

The Commissioners,
Office of the Independent Planning Commission,
eMail:

Dear Commissioners,

CHAIN VALLEY COLLIERY CONSOLIDATION PROJECT (SSD-17017460) THE ALTERNATIVE to APPROVAL

It is well known that Vales Point Power Station has already caused dreadful damage to the environment and terrible health consequences to the people of the area. Enabling the Vales Point coal electricity output to continue to 2033 by allowing Great Southern Energy Pty Ltd ⁽¹⁾ to extend the Chain Valley mine, will continue that damage and cause enormous cost to the Federal and NSW State Governments. Set out below are all our arguments opposing such extension to the Chain Valley coal mine and to Vales Point Power Station operation.

There should be no need to reiterate in great detail the serious reasons why the project should not be approved. You will have been already supplied with a massive amount of evidence of the dire consequences of approval provided by entities such as Environmental Justice Australia, Australian Conservation Foundation, Future Sooner, Coal Ash Community Alliance, the NSW Environmental Protection Authority, the Hunter Community Environment Centre, ourselves and many others. Nevertheless we implore you to also study our evidence rather than accept politically inspired data.

Your consideration of the Chain Valley Colliery Consolidation Project application must not only take into account the direct effects of the underground coal mine but ALSO the indirect flow on effects from Vales Point Power Station burning the coal for another four years.

Note (1) - Great Southern Energy Pty Ltd (trading as Delta Coal / Delta and all owned by Sev.en Global Investments owned and controlled by Czech billionaire Pavel Tykač whose entities also own Vales Point Power Station)

The NSW Government Department of Planning, Housing and Infrastructure assessment provided to you on December 16th, 2025, which is in our opinion, a **flawed and biased report**. It is seemingly designed to support government policy with the aim to convince you that the Chain Valley project must proceed. For decades governments have repeatedly ignored environmental damage and serious health dangers to the population of NSW by approving new open cut and other coal mines. The assessment supplied to you on December 16th, 2025 summarises its report and we comment as follows -

1. Strategic context – It is irrelevant that the project is considered to *be in accordance with key relevant strategies including Australia’s Long-Term Emissions Reductions Plan, NSW Climate Change Policy Framework, Strategic Statement on Coal Exploration and Mining in NSW and Central Coast Regional Plan*. These are all political opinions and do not reflect the requirement to consider the likely impacts – environmental, social and economic.
2. Subsidence – The government report requests that you *undertake a comprehensive review of the subsidence assessment and advise the adequacy of the subsidence predictions*. If subsidence occurs the consequences are dire. We must have certainty, not predictions.
3. Air Quality – You have already been presented with substantial evidence of the environmental damage, toxic air pollution and the resulting serious damage to the health of the resident population . The department assessment report states *predicted particulate matter (PM10 and PM2.5) concentrations are within national standards*. These predictions are misleading as they do not take into account cumulative impact. This application is for a new coal mine and an extension to the operation term of Vales Point Power Station. That all adds to the accumulating damage to the environment and the people’s health from the previous decades of operation of the power station. You will be aware that Vales Point Power Station has been fined on several occasions and also warned under the court threat of closure, to reduce their toxic emission, to that permitted by their licence agreement, following the Environmental Justice Australia (EJA) successful court action (see page 2. of EJA report in October 2024). Predictions cannot be relied on and the only way the public and environment can be safe is to not approve the Chain Valley extension and force the power station to close by 2027 as originally planned.
4. Greenhouse gas emissions – The department assessment refers to the **greenhouse gas emissions of the mine only** and also refers to operation only until 2029. The assessment is flawed because the coal is being used to generate power at the Vales Point Power Station. The greenhouse gas emissions will, almost entirely, be emitted from the Vales Point Power Station, not the underground mine. The assessment states – *To ensure Extraction impacts remain acceptable the panel recommended ...* The recommendations include mine design, extraction plans, monitoring, geotechnical investigations, environmental consequences (e.g. seagrass). Those recommendations refer only to the mine and not to the Climate Change effect and environmental damage caused by the huge greenhouse gas emissions from Vales Point Power Station operating for a further four years until 2033.
5. Other issues – The assessment refers to impacts on water resources, traffic and transport, biodiversity, social and economic. The department suggests *the implementation of reasonable and feasible mitigation measures can be applied to*

manage the impacts ... via strict conditions of consent. It has been shown in the past that *strict conditions* are often broken despite the often minimal fines. The danger to our environment and our health is too important to risk.

Governments and the Environmental Protection Authority (EPA) have a history of failure to force polluters to abide by the environmental laws.

- THE ALTERNATIVE to APPROVAL , NOT APPROVE THE CHAIN VALLEY COLLIERY CONSOLIDATION PROJECT thus forcing VALES POINT POWER STATION to CLOSE in 2029. Suggest that the NSW Government negotiates with ORIGIN ENERGY to EXTEND THE OPERATING TERM of ERARING POWER STATION to 2033 -

Anybody opposed to the above alternative plan will say that a result of the closure of Vales Point Power Station there would be blackouts in NSW. If Vales Point closes in 2029 there will not necessarily be electricity load shedding (blackouts) but the risk of load shedding could be increased. The counter argument to that is as follows - nearly every day there are announcements of new large battery installations and major solar panel installations starting up or being built. There has been a massive uptake in domestic battery purchases following the Federal Government introduction of battery subsidies. Ausgrid + Origin are developing a community battery system trial explicitly for people who, for whatever reason, can't or are unable to install solar panels on their homes (https://www.originenergy.com.au/nsw-ausgrid-community-battery-trial/?utm_source=chatgpt.com). In the pipeline, or under construction, is more dispatchable- pumped hydro. For example, Snowy 2. is expected to be completed by the end of 2028. There are other major technological advances in sustainable electricity production.

Origin Energy has announced it is piloting at Eraring a new system by installing the Allegro Energy Australia's first locally-manufactured long-duration electricity storage system, [microemulsion flow battery](https://www.originenergy.com.au/blog/allegro-energy-unveils-flow-battery/?utm_source=chatgpt.com).

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On February 23rd 2026, Renew Economy published the NSW Government announcement that it has awarded six new huge 8-hour battery projects to be completed by 2023 which will greatly reduce any load-shedding risk. [NSW awards contracts to six huge 8-hour battery projects, including the biggest in Australia](#)

All the above developments and many others being developed will reduce the risk of load shedding after 2029 and after closure of Vales Point Power Station in 2029 regardless of whether Eraring is given permission to continue operation until 2033.

We set out below the facts comparing the emissions from the Vales Point Power Station to the emissions from Eraring Power Station. It is widely known that the coal used by Vales Point Power Station from Mandalong Coal mine and other sources is much dirtier coal than that used by Eraring Power Station sourced from Myuna Coal mine and Upper Hunter Valley open cut Coal mines. Here is some data we have found.

ERARING POWER STATION

- Eraring is reported on the Clean Energy Regulator, for the financial year ended 30th June 2024 as having an output of 15,617 GWh
- Eraring has been using a blend of Myuna coal with coal from the Upper Hunter open cut mines and some Mandalong coal. We have been told by an Origin Energy management executive that Eraring blends the coal from the three sources to achieve coal with about 18% ash content.
- Upper Hunter open cut coal mines have coal with a range of ash content from about 10% to about 20%. The mine owners wash and mix the coal to the ash level required by customers.
- Myuna coal is described as having 20.5% raw ash.
- Eraring, for year ended 30th June 2024, is estimated to have used 5-6 million tonnes of coal
- Eraring is now recycling 80% to 88% of its coal ash generated.
- Eraring is calling for expressions of interest to develop within 18 to 24 months, a system whereby stored ash in its ash dam can be recycled for use in concrete. This will mean that after all power stations have closed, they aim continue to sell ash for recycling stored in their ash dam.
- The renewal of the Eraring contract to purchase Myuna coal is under negotiation. If the negotiations fail that would mean that the Myuna coal mine will close and 300 miners jobs and 1,800 supply chain jobs will be lost causing an economic loss to the Lake Macquarie area of \$75 million and \$65 million respectively.
- Origin Energy (Eraring) CEO Frank Calabria has announced that they have developed a system [probably the two-shifting system] of ramping down power station output by 80% during the peak sustainable power generation period in the middle of day and early afternoons. We do know that Eraring has been recently running below its 2.88-gigawatt capacity and that gives it the opportunity to fire up the turbines to full production when needed. Ramping and strategically managing the operation of the four turbines and their battery storage will significantly reduce toxic emissions, greenhouse gases and coal ash accumulation.
- Eraring is reported on the NSW EPA public register for FY2024 as emitting – 36,806 tonnes of SO_x and 20,428 tonnes of NO_x
- Eraring has already installed a large battery, stage 1. Stage 2. will be operational within the year and stage 3. after next year. That will provide enough electricity to power NSW for 4 hours.

VALES POINT

- Vales Point is reported on the Clean Energy Regulator data base for the financial year ended 30th June 2024 as having an output of 7,260 GWh

- Delta's uses Chain Valley coal and Mandalong Mine coal. Chain Valley coal has an ash content of 23% to 26%, Mandalong has an ash content of 20% to 30%. Average say 25%
- Vales Point, for year ended 30th June 2024, is reported on Delta's EPL 761 Annual Coal Ash monitoring report to have used 3,108,278 million tonnes of coal.
- Vales Point seems to have an ash recycling program which achieves only about 20% recycled.
- Vales Point Power Station has not made any announcements that it has the ability to reduce output by the two-shifting method of ramping down output during the peak sustainable power generation period.
- If Vales Point Power Station closed about 550 people would lose their jobs plus another 1,000 indirect jobs could be lost.
- Vales Point Power Station is reported on the NSW EPA public register for FY2024 as emitting – 25,000 tonnes of SOx and 17,008 tonnes of NOx
- On February 22nd, 2026 *RENEW ECONOMY* published an article (https://reneweconomy.com.au/generators-clash-over-vales-point-cash-demand-but-small-retailers-say-they-are-the-real-victims/?utm_source=chatgpt.com) *Delta Electricity, the owner of the 1.32 gigawatt (GW) Vales Point coal fired power station, says it can no longer get financing facilities from banks because of their commitments to lower emissions, and has asked for the rules to be changed to allow it to use cash as credit to meet its market obligations.* These sorts of serious issues could continue for Vales Point owned by Delta. Eraring, owned by Origin Energy, a listed public company does not have these sorts of issues.

All the above data for the year ended 30th June, 2024, boils down to the following comparison between the two power stations –

ASH

- Assuming Eraring continues to purchase and mix coal to achieve 18% ash content there would be 63 tonnes of ash produced per GWh of electricity produced.
- Assuming Vales Point uses a blend of Chain Valley and Mandalong coal at 25% ash content there would be 107 tonnes of ash per GWh of electricity produced

NOx

- Eraring would emit 1.31 tonnes of NOx per GWh of electricity produced
- Vales Point would emit 2.34 tonnes of NOx per GWh of electricity produced

SOx

- Eraring would emit 2.36 tonnes of SOx per GWh of electricity produced
- Vales Point would emit 3.44 tonnes of SOx per GWh of electricity produced

The following conclusions –

- Vales Point emits 76% more NOx and 46% more SOx than Eraring per GWh of output.
- Vales Point produces 70% more ash per GWh of output than Eraring and
- Eraring recycles over 80% of its ash and has a project plan for recycling after the coal fired power stations close. It seems that Vales Point recycles only 20% and has no plans for future recycling.
- When Eraring ramps down its output by up to 80% during the middle of the day there will be a significant reduction of all toxic emissions quoted above. We could not find any announcements by Vales Point Power Station (Delta) that they have that capability.

- If Vales Point power station closes in 2029 and Eraring is given approval to continue to operate until 2033 it is probable that Eraring will continue to need Myuna coal. Therefore, although 550 Vales Point miners would lose their jobs plus another 1,000 indirect jobs could be lost, the continuation of Myuna Coal Mine would save the jobs of 300 miners and 1,800 supply chain jobs.

Approval for the Chain Valley mine expansion must not be granted in view of the compelling reasons detailed above and in the massive amount of well documented supporting evidence submitted to you by us and others. If approved there would be -

- an unacceptable risk to the health of the over 240,000 people of the Lake Macquarie area and millions of visiting tourists each year.
- significant concerns for the serious bad impacts on the ground water in that area and leaching into Lake Macquarie from the ever-increasing volume ash stored.
- Health impacts from toxic coal dust, toxic ash dam dust and airborne toxins
- The suggested economic impact of closure, job losses etc, is insignificant bearing in mind that all the Lake Macquarie power stations will be forced to close by the mid 2030s regardless. The costs to health, the environment, the climate change far exceed the cost of the jobs for a few short years.
- Extending the life of a dirty coal fired power station is contrary to the long-standing government climate change aims to reduce emissions by 43% of the 2005 levels.
- If approval is given it makes a mockery of the long standing NSW Planning Principles bearing in mind all the factually based evidence submitted to you of the significant risk to the environment and to air quality seriously affecting people's health. This is especially true in view of the cumulative effect from previous mining and power station operation.

Your decision should not be a political decision; it should be based on the facts summarised above.

Yours faithfully

KEEP LAKE MACQUARIE CLEAN - Committee



James C H Horn
Derek Pola
David Ransom
Bruce Macfarlane
David Tait