

SUBMISSION

Peter Morris
[REDACTED]

OBJECTION to Chain Valley Colliery Consolidation Project (SSD-17073461)

The Mine's Raison d'être

The mine exists to serve Vales Point Power Station (VPPS), yet this power station and its ash dams are clearly situated in an unsuitable location immediately beside Mannering Park and within the rapidly developing Northern Lakes District of the Central Coast.

It is now forty-five years since Vales Point B was commissioned and it is no longer the state's biggest power station. It is obsolescent and was sold cheaply by the NSW Government for this reason. The fact that it was considered not worth keeping should guide decisions about its associated mines and it would be folly to continue mining merely because coal could be extracted. The life of the mine should be determined by the life of the power station, i.e. up to 2029.

I cite this as the **first reason** to reject the Chain Valley Colliery Consolidation Project.

Constraint by Population Growth

Census data shows that Newcastle, Lake Macquarie and the Central Coast have a combined population of over 550,000 surrounding VPPS and Chain Valley Colliery.

Vales Point may have been a suitable location to construct Vales Point A in 1959, but sixty-seven years later it is not a suitable location to support moribund technology that is in conflict with its environment.

According to Central Coast Council¹, population increases in the Northern Lakes District around the colliery to 2046 will be 17.92% bringing it to 21,909

Within this, Mannering Park will increase by 7.1% to 2,901 and Chain Valley Bay will increase by 26.8% to 11,069.

I cite this as the **second reason** to reject the Chain Valley Colliery Consolidation Project.

Lapsed Suitability of the Site

Under the NSW Coal Industry 2026–50 policy, the NSW Government will prohibit new mines in greenfield sites in order to avoid conflict with other land uses and facilitate suitable development.

With the population growth planned for this area, an objective assessment would see it as clearly appropriate to treat it as though it were a greenfield site because of urban constraints. This is exacerbated by the continued presence of the outdated VPPS.

I cite this as the **third reason** to reject the Chain Valley Colliery Consolidation Project.

Failure to meet NSW Coal Industry 2026–50 policy

Under the new policy, large underground mines must implement onsite abatement technology, such as ventilation air methane systems and gas flaring, to reduce "fugitive" emissions. The current proposal clearly does not do this. It proposes nothing in the way of sealing old workings against "legacy" methane leakage and the proposal to monitor gas leakages² cannot lead to any improvements within the life of VPPS.

I cite this as the **fourth reason** to reject the Chain Valley Colliery Consolidation Project.

Nexus between Chain Valley Colliery and VPPS

A further point is based on the fact that the mine was established to feed the VPPS and does not have facilities for surface stockpiling other than to meet fluctuations in demand by that user. All of Delta's justifications³ for the current application are to meet the needs of VPPS. On this basis, there is little justification and no benefit in approving the Chain Valley Colliery Consolidation Project.

The Minister for Natural Resources, in her foreword to NSW Coal Industry 2026–50, wrote that mining "...sustains many regional communities..."⁴ This may be historically true in this case, but the combination of VPPS and Chain Valley Colliery have regressed from sustaining a regional community to stifling and impacting upon an urbanising one. It is a situation not adequately considered in the new policy and is an anachronism that must not be extended. I cite this as the **fifth reason** to reject the Chain Valley Colliery Consolidation Project.

1. <https://forecast.id.com.au/central-coast-nsw/about-forecast-areas?WebID=630>
2. State Significant Development Assessment Report (SSD -17017460), Department of Planning , Housing and Infrastructure p51
3. Presentation to Public Hearing, 19 Feb 2026, p8
4. NSW Coal Industry 2026–50, NSW Government

Thank you for accepting my submission, I look forward to your conscionable decision.

Peter Morris Dip. Teach. (Tech), B.Ed.(TAFE) Dist.