

DENMAN NSW 2328

20th December, 2012

The Director General
The Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir / Madam,

Re: Objection to the Anglo American Drayton South Open Cut Mine Proposal

I am writing as concerned Denman residents to object to the Drayton South open coal mine project. We are both employed locally in the Thoroughbred Industry which we have been for the last 20 years, prior to owning our Family Business in Denman. We are 4th Generation and are proud of our ancestry with my Great Grandfather Landing and Evacuation of the Dardinells at Gallipoli and also at the Charge of the Battle of Lone Pine in France. My reasons for objecting to this proposal are as follows:

The impact this mining proposal will have on neighbouring industries and community i.e. the Thoroughbred Industry is our employer and the project is right across the road from our Stud. This will have a flow on effect to the other producers in our area.

The most relevant issue to us is the lack of evidence that the land can be returned to viable agricultural use post the mining project.
Pollution of water sources and water quality which our valley and our town at Denman relies on heavily.

The area is already visibly disgusting with the mine dust, and the local areas that were once attractive to tourism are already showing signs of a slow down.

We travel the Golden Highway daily and find it confronting that we have to put up with the heavy wide loads and extra mine traffic which exists at present and with the Open Cut Proposal this will only increase this traffic, in areas that were not designed or planned for and in some cases are downright dangerous.

I respectfully ask that you register my objection to this proposal and seriously consider my objections when assessing the appropriateness of the Drayton South open cut coal Proposal.

Yours faithfully,

Socio-Economic:

- Operating the farm is the primary / sole source of income to your household.
- Farm Productivity (sustained value of agricultural output from your current production levels and the impact this would have on the region).
- Land values and how mining would adversely impact upon them.
- Viticulture – value of the reputation of the Hunter Valley
- Business model of your business (e.g. agriculture, tourism) and the importance of a clean green impact to your businesses growth and future development.
- The impact this mining proposal will have on neighbouring industries and community: thoroughbred industry is a key employer in the region and the project is right across the road from the two biggest studs. This will have flow on effects to the other producers in the region.

Soil and Land capacity:

- Lack of evidence that the land can be returned to a viable agricultural use post the mining project;
- Soil characteristics, including types and depth;
- Topography / slope;
- Agricultural support infrastructure;
- Weed management,
- Bio security- (a set of preventive measures designed to reduce the risk of transmission of infectious diseases, quarantined pests, invasive alien species, living modified organisms)

Water issues:

- pollution of water sources / water quality
- water moves away from agriculture and any water quality issues as they affect agriculture,
- known and documented breaches of the codes of conduct / regulations regarding water usage and disposal.

Visual:

- How will the project impact on the visual character and amenity of the region?
- Who is the mine visible to?
 - traffic from Golden Highway/ tourism / quality of life
 - taking into consideration residences and vantage points on various properties
- Visibility of dust and lighting and its adverse impact on your business.

Heritage (are there any heritage factors that should be highlighted) i.e.:

- Aboriginal
- Non-Aboriginal
- Overall value to the community and cultural identity of the region
- Tourism value

- Are there any historical structures / sites that you are concerned will be affected by blasting and dust etc?

Social and Economic:

- Skill shortages / labour shortage in the region;
- Lack of affordable housing;
- Pressure on the supply and demand for community services and facilities such as:
 - Emergency services
 - Hospitals
 - Schooling
 - Recreational
 - Demographic of the area (predominately Anglo-Saxon, male)
- Increased traffic concerns / oversize vehicle road usage (for individual project as well as cumulative effects) – making it more difficult and less safe to traverse with farm machinery.
- Increased congestion on roads leading to a greater likelihood of accidents/ decreasing safety.
- Threat to the diversity of the regional economy as mining drives out other sustainable industries and the long term employment they provide.
- Threat to the sustainability of the regional economy and the threat to the fabric of the region if sustainable industries are squeezed out.

Air Quality / Dust:

- Dust effects on:
 - Overall air quality
 - Residences / rain water catchment
 - If dust produced by the mine is to be subdued by watering we are concerned by the run off of this polluted water and also concerned as to the usage of precious water for this unnecessary purpose when it would be better allocated to farms in order to produce.

Health:

- Concerns regarding the impact of continuing increases in mining dust on community health.
- No cumulative impacts have been considered.
- Precautionary principle regarding health effects short and long term should be applied; there is insufficient data to make a sensible determination regarding the health effects upon the residents of the regions that are already exposed to high density coal mining, particularly open cut.

Lack of cumulative studies overall (on dust, health, noise, traffic congestion, safety etc)

- The Drayton South proposal lacks consideration of all the cumulative impact of mines together in the region on dust, health, noise, traffic, safety and the character of the region)
- Industrialisation of the region
- Irreversibility of the damage caused

More Detailed Grounds for Concern with the Drayton South Environmental Assessment (EA):

- 1) Surface Water Impacts; The EA fails to discuss the relative values of the local watercourses from commercial, aesthetic and ecological perspectives.
- 2) Groundwater Impacts; The EA fails to address the cumulative effects from existing operations and are likely to be compounded by the impacts from proposed adjacent mining projects.
- 3) Agricultural Impact Assessment; The economic analysis does not address the impacts on the neighbouring farms. The assessment is solely based on the site and the off-set site.
- 4) Ecology; The competition resulting in the nearby farm and woodlands from the addition of new species from the project site would result in high levels of competition for food and shelter.
- 5) Economic Impact Assessment; The assumed value of coal in the analysis appears high given a 27 year project time span. The impacts on farm productivity and land values for neighbouring properties have not been included. The assumptions around the impact on Labour appear inconsistent with extremely low unemployment rates of the neighbouring towns.
- 6) Social Impact Assessment; No serious consideration is given to assessing and addressing the cumulative effects of this project on agricultural industries or to the impact of a larger population or demand on housing affordability, supply and demand for community services and facilities.
- 7) Soil and Land Capability; the criteria for assessing the land suitability has not been specified in the report.
- 8) Visual Impact Assessment; Lack of information on the visual changes on the site in the initial years. The mapping makes it difficult to fully assess where the bund will be positioned. What will be the impact of the bund on the local microclimate, wind directions etc. The impact of dust and lighting to the local community is only briefly addressed at the end of the impact assessment. Measures to mitigate the visual impact of the construction of the bund include progressive tree planting however no detail is given as to likely success of this, strategy if survival rates are low, maturity profile of trees being planted etc.
- 9) Acoustic Impact Assessment; the impact of blasting on the community, neighbouring livestock and continued and incremental increase in rail noise is not fully accounted for.
- 10) Traffic and Transport Impact Assessment; In addition to concerns about the cumulative impact of an additional mine on the infrastructure in the area, there are also concerns that key proposed intersection upgrades should be completed before the construction period for the mine commences to ensure it operates safely.
- 11) Air Quality Impact Assessment; Whilst the report states that ground-level concentrations will be minimised through monitoring and mitigation measures and best practice will be implemented, the study has not demonstrated that these will be sufficient to achieve compliance with the criterion.