

18 January 2013

Mr David Mooney  
Senior Planner - Mining Projects  
Department of Planning & Infrastructure  
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SYDNEY NSW 2001

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Dear Mr Mooney

**DRAYTON SOUTH COAL PROJECT (APPLICATION No. 11\_0062)**

I refer to the Environmental Assessment (EA) exhibited on the NSW Planning & Infrastructure web site in relation to the Drayton South Coal Project. An extension to the date for submissions was sought and granted to 18 January 2013.

The application for the Drayton South Coal Project has been reviewed by Hunter New England (HNE) Population Health with particular attention being paid to management of issues such as air quality, noise and vibration, water and other issues which may have an impact on public health.

The following issues are discussed and should be considered in the approval process for this project:

**Air Quality**

The Drayton South Coal Project is in close proximity to residential dwellings that will be impacted by particulate matter – particularly along the southern border of the project. Comments are focussed on PM<sub>10</sub> levels, which are more likely to be of concern than PM<sub>2.5</sub> levels, and to the impact on private residences, assuming that the mine would vacate occupants of any mine owned residences subject to adverse air quality.

The air quality modelling suggests that the project alone could add up to 50-106 µg/m<sup>3</sup> to the maximum 24 hour PM<sub>10</sub> for six private residences which is a significant increase given the 24 hour average goal is 50 µg/m<sup>3</sup>. Twelve private residences are predicted to be subject to between 10 and 102 exceedances of the 24 hour average PM<sub>10</sub> goal of 50 µg/m<sup>3</sup> in year 10 of the project.

There are predicted exceedances of the annual average PM<sub>10</sub> goal of 30 µg/m<sup>3</sup> criteria at three private residences with most residences subject to cumulative annual average PM<sub>10</sub> levels of 15-19 µg/m<sup>3</sup> with over 10 residences subject to annual average PM<sub>10</sub> levels in the range of 20-25 µg/m<sup>3</sup>.

The EA assumes that PM<sub>10</sub> level goals will remain static throughout the duration of the 27 year project. Even if regulatory goals do not decrease, societal expectations of cleaner air will increase. Urban air in Sydney will continue to improve in quality while the air quality in the Drayton South project area will worsen and in many areas exceed the PM<sub>10</sub> levels in Sydney. The California Air Resources Board Standard annual average goal for PM<sub>10</sub> is 20 µg/m<sup>3</sup>. Any modelling beyond a 10 year timeline could consider that the annual average PM<sub>10</sub> goal may have been reduced to below 30 µg/m<sup>3</sup> over that time period.

Thus, the Drayton South Project air quality modelling suggests a significant increase in particulate impacts for the community. Additionally, it is unlikely that current air quality goals will be acceptable 27 years into the future of the project.

## Noise

Many properties are predicted to experience mild to moderate noise impacts. The EA does not clearly demonstrate that the community residing within the noise impacted area have been consulted and offered methods to mitigate noise impacts.

## Rain water tanks

The EA does not mention issues associated with water quality from rainwater tanks at residences without a reticulated water supply. Whilst it is acknowledged that mining operations are unlikely to contribute metal contamination to tanked rainwater, the physical attributes of water may be impacted by mining construction and operations. It is recommended that the applicant address the issue of potential impacts on rainwater quality.

A management system of taking complaints and rectifying issues identified should be considered. The peak reference document in Australia for information in relation to rainwater tanks is the enHealth, *Guidance on use of rainwater tanks*. This document can be accessed on the web at:

[http://www.health.gov.au/internet/main/publishing.nsf/Content/DD676FA1241CDD0DCA25787000076BCD/\\$File/enhealth-raintank.pdf](http://www.health.gov.au/internet/main/publishing.nsf/Content/DD676FA1241CDD0DCA25787000076BCD/$File/enhealth-raintank.pdf)

It would be appropriate to apply this standard to rainwater tank systems within the vicinity of the mine in a proactive manner.

## Stakeholder engagement

It would be useful to have an independent assessment of community satisfaction with the stakeholder engagement program to provide reassurance of the applicant's performance in this important area and guidance for future improvement if required.

Property Devaluation is identified as one of the nine key stakeholder issues on page 5 of Appendix D: Stakeholder Engagement of the EA. This section advises that this issue will be addressed in the EA. However, it appears that the Property Devaluation assessment was not included in the final EA.

If you require any additional information, please contact Carolyn Herlihy, Environmental Health Officer on 4924 6468.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'David Durrheim', with a large, sweeping flourish extending to the right.

Professor David Durrheim  
**Service Director – Health Protection**  
**Hunter New England Population Health**