

To: Independent Planning Commission of NSW

Re: Objection to Bylong Coal Project

From: Rosemary Hadaway, [REDACTED] Budgee NSW [REDACTED]

I addressed the Commission at the public Meeting held on Wednesday 7th November 2018. This submission reiterates the points made, and adds further detail to my presentation.

The evidence presented clearly indicates that the major negative impacts of this Project completely outweigh any short-term gain. This is the wrong mine in the wrong place! If approved there will be irreversible negative changes to climate, biodiversity, water, landscape, landform, agriculture, heritage, culture and community...the list goes on. I repeat - the wrong mine in the wrong place!

Speakers at the meeting who supported this Project were concerned about (and looking for) financial, economic and job benefits. It must be understood that this Project will **not** deliver long-term positive results in these areas. In fact, the reverse is true - consider the negative impacts listed above, as put forward by many expert speakers who have studied these matters across a range of similar Projects in NSW. Bylong Coal Project is not the answer - it will deliver short-term financial gain to a few. In fact the KEPCO Chief Operating Officer Bill Vatovec stated this himself claiming the Project is a 'generational investment'...AT WHAT COST?

I draw your attention to matters of concern regarding **traffic** in the documents. If this mine is approved, you must be aware of the major impact of greatly increased traffic on Wollar Road. This impact has not been addressed in the Final Assessment Report or the 'Recommended Conditions'.

According to KEPCO's EIS Appendix Z Traffic and Transport Impact Assessment (2015), in all construction and work phases Wollar Road will carry 85% of staff trips in light vehicles, and 80% of heavy vehicle movements, and all oversize vehicle movements. As such it is the principal artery for all traffic. Despite the Worker Accommodation Facility (WAF) now being dropped from the Project plan, and a Revised Mine Plan being put forward, there has been **no detailed revision of the traffic issue in regard to Wollar Road**. All responses from KEPCO regarding regional roads have focussed on the sealing of Wollar Road from Wollar to Bylong Valley Way, the upgrading of Wollar Road through Munghorn Gap, appropriate adjustment of work to accommodate school bus routes, and the discussions with Muswellbrook Shire Council. The full length of Wollar Road will have hugely increased traffic loads up to 2044 and this impact has not been assessed.

Wollar Road was deemed unsuitable to be upgraded to service mine traffic for the other 3 mines in the area. What has changed? It is narrow and dangerous, with the added complication of being an east-west transit thus producing a sun-glare problem for road users heading east in the morning and west in the afternoon.

We are left with the significant questions: How many vehicle movements will there be along the length of Wollar Road, now that there is no WAF?...what will the impact be of that increased traffic? Further to that, what sound and light barriers will be offered to residents to protect them from the impacts of a 'peak workforce number of 800 associated with site activity during the construction phase' (EIS Appendix Z)? What safety precautions for intersections, property entrances, rural vehicle movements? What compensation for traffic noise, exhaust braking noise, fumes and vibrations?

I refer to the Final Assessment Report section 2.11:

The Department of Planning and Environment has detailed funding arrangements for road upgrades and maintenance between the Mid-Western Regional Council (MWRC) and KEPCO. On-going discussions between these bodies has occurred - but **do not confuse council support for community support**. Our Mayor and other councillors have business interests that would benefit from short-term financial gain - yes, short-term: our life-time! Remember the irreversible changes I listed earlier?...this short-term gain is very short-sighted and comes at what cost? In the Report **there is no allocated upgrade for the length of Wollar Road** between Wollar and the Ulan Road intersection. Likewise there is no funded upgrade or recognition of increased traffic on Ulan Road between the intersection with Wollar Road, and Mudgee town. The only upgrading listed is through Munghorn Gap. I'm sure the many native animals which enjoy the habitat of this Nature Reserve will appreciate the better road surface on which to meet the heavy vehicles and commuter traffic generated by this project - if it is approved.

There is no assessment of cumulative traffic for Ulan Road from Wollar Road to Mudgee town. This 10km of road has many intersections, property entrances and tourist destinations. This impact must be assessed.

The Department has presented to you their Recommended Conditions:

The key feature of the Recommended Conditions (in regard to traffic) is the preparation of a Traffic Management Plan which must be approved by the Planning Secretary and implemented by the proponent. This has the potential to greatly reduce the impact on the length of Wollar Road. It is a good start, but this Plan must be developed transparently and with community input. It must contain measurable objectives which give employees the opportunity to be part of reducing the impact and becoming a positive part of their new community. KEPCO can do this - eg, they **require** their employees to reside with 1hr commute time from the Project. I believe they should **require those same employees to use buses and car-pooling**. Reduced pavement dilapidation, reduced noise, fumes, vibration, danger to wildlife and other road users would be the result. There would also be greater safety for KEPCO workforce.

The recommendations ask KEPCO to '**describe the measures that would be implemented to**...' 'minimise impacts...manage fatigue...improve road safety...use buses and car-pooling as far as reasonably practicable'. Description of the measures is not sufficient! Genuine commitment requires an action plan. This is what must be included in the Traffic Management Plan.

If this Project is approved, the potential traffic impacts for Wollar Road are horrendous! You have the capacity to refuse this Project entirely, and I believe this would be the right path. If it is passed, you must show due regard to the community and residents impacted by your decision.

Thank you.