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**STRATFORD EXTENSION PROJECT  
PLANNING ASSESSMENT COMMISSION DETERMINATION  
SUBMISSION BY THE  
BARRINGTON-GLOUCESTER-STROUD PRESERVATION ALLIANCE**

**1.0 Introduction**

The Barrington Gloucester Stroud Preservation Alliance (BGSPA) has made previous submissions to the Department of Planning and Environment (DPE) and the Planning Assessment Commission (PAC) in relation to the Stratford Extension Project.

This further submission by BGSPA provides comments on DPE's recently completed Final Assessment Report and revised recommended conditions of consent. It also sets out BGSPA's views on the key matters to be taken into account by the consent authority in determining whether to grant consent to the proposed development.

**2.0 Significance of the Resource**

The NSW Mining SEPP requires that "in determining an application for consent for development for the purposes of mining, the consent authority must consider the significance of the resource that is the subject of the application, having regard to the economic benefits, both to the State and the region in which the development is to be carried out, of developing the resource".

Relevant matters are employment generation; expenditure, including capital investment; and the payment of royalties to the State.

The SEPP also stipulates that in determining whether to grant consent to the proposed development, the significance of the resource is to be the consent authority's principal consideration. Accordingly, the weight to be given to any other matter is to be proportionate to the importance of that other matter in comparison with the significance of the resource.

The PAC's Review Report (April 2014) stated "on the information currently available, the merits of the project are too finely balance for evaluation against the criteria in s79C".

Over the year since then the "significance of the resource", including economic benefits such as jobs and royalties has declined, whereas other matters such as residual noise impacts remain substantial.

### 3.0 Implications of Low Coal Prices and High Uncertainty on the Assessment of the Significance of the Resource

The modeling of economic benefits in the project EIS was based on coal prices of A\$178/tonne and A\$111/tonne for coking & thermal coal respectively. DPE's Final Assessment Report points out that prices have fallen significantly since then "and there is a substantial possibility that they will fall further or remain flat over the next several years".

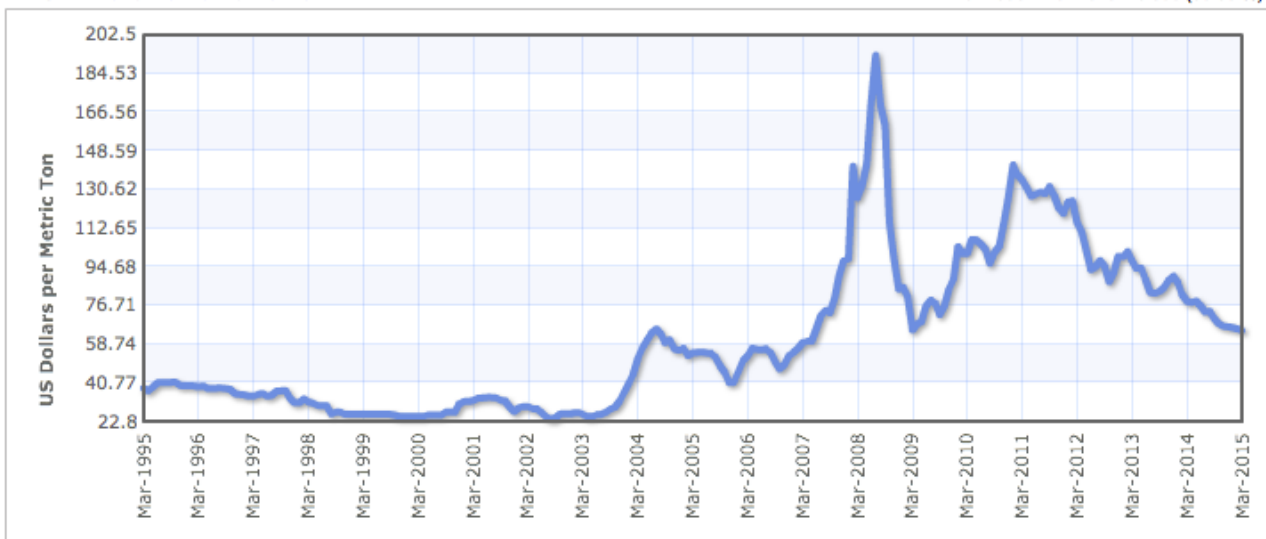
The Department of Resources and Energy (DRE) reviewed coal prices and their impacts on the project's NPV. Maintaining that it was taking a conservative approach, DRE used a long-term export thermal price of A\$90/tonne. However as at 31 March 2015 thermal coal ex Newcastle was trading at \$84.02/tonne – significantly below the DRE estimate, suggesting that even DRE's lowered estimates of the project's NPV (\$62m) are too high.

It is puzzling that DRE should consider the coal price to be "at the bottom of the price cycle". As charts of coal prices over the past 20 years show no clear cycles, there can be no assumption that an upward trend is imminent.

Coal, Australian thermal coal Monthly Price - US Dollars per Metric Ton

Range 6m 1y 5y 10y 15y 20y 25y 30y

Mar 1995 - Mar 2015: 26.600 (69.36 %)



**Description:** Coal, Australian thermal coal, 12000- btu/pound, less than 1% sulfur, 14% ash, FOB Newcastle/Port Kembla, US Dollars per Metric Ton

Source: Index Mundi, 2 May 2015

The Final Assessment Report notes that in response to questions from the PAC, Yancoal did not vary the prices used in the EIS, but rather defended the basis of its calculation in the following terms, "With respect to the coal price assumed in the economic analysis presented in the EIS, it should be noted this coal price is based on SCPL's long term broker views, guidance from major trading houses and customers, and by procuring commercially available long term forecasts from independent industry experts."

Those forecasts have not been provided to DPE or the PAC. However there are available, forecasts from internationally recognised analysts, including the World Bank, which

forecasts that Australian coal prices will not recover to the 2013 level of \$84.6 (nominal US dollars) until 2021. This is supported by the Economist Intelligence Unit, which forecasts the coal price to remain below US\$84.6/tonne until at least 2019. (IEU Economic and Commodity Forecast, February 2015).

In its Final Assessment Report DPE comments that “Future coal prices are critical for assessing the current NPV of the project, the returns to the NSW economy and projected royalty returns .... It is perfectly reasonable for the PAC to consider these key matters in the light of current and forecast coal prices. However it must be recognised that it is also entirely within Yancoal’s prerogative to delay commencement of the project until coal prices are more attractive .... That is, coal prices leading to a negative or very low NPV may delay commencement of the project until forecast coal prices are sufficiently attractive for Yancoal to commence its investment and implement the project”.

However there are grounds for concern that if the project were approved on the basis of a marginally positive NPV, Yancoal could proceed to commence the project even if market conditions (and hence royalties) failed to recover or declined further. This is discussed further below.

Approval of such a marginal project in an uncertain market climate would carry the risk of the project being commenced despite the “value of the resource” being far outweighed at the time by other factors including adverse impacts of the operations on the local area.

BGSPA urges that the PAC, as consent authority, takes a cautious approach in determining the significance of the resource relative to other considerations to avoid such an outcome in relation to this proposed development.

Rather than risk such an outcome, the proposal should not be approved at this time. The doubts about the economics of the project and the significance of the resource are such that there is no margin for error in the consideration of consent as proposed in the Final Assessment Report.

Should the many uncertainties be resolved in the future, the proposal could be reconsidered at that time.

#### **4.0 Possible Implications of the Take-or-Pay Coal Transport Contracts**

Take-or-pay contracts force mining companies to pay for rail and port capacity over many years, regardless of whether they use that capacity or not. Many of these contracts were struck in 2011 when coal prices were around their peak. Media analyses have suggested that some companies in the coal sector have been forced to keep loss-making mines open because the take-or-pay contracts would make it more expensive to close them (SMH 2/3/15).

Posting a second consecutive full year loss in March 2015, Yancoal was reported as saying that take-or-pay rail and port contracts were a major factor in its \$353.4 million full-year loss. The financial statements published by Yancoal suggest the company is tied to take-or-pay rail and port contracts for many more years. Yancoal noted a \$10.1 million current

provision for take-or-pay contracts, and a \$46.1 million non-current provision for the contracts (SMH 2/3/15).

This is of particular relevance to the question of approval of the Stratford Extension Project.

The record of a PAC meeting with Yancoal on 18 February 2014 includes an entry stating Yancoal confirmed that, beyond the immediate economics of the proposal "There were other economic factors important to the Proponent that made the proposed extension important, including existing liabilities under transport take-or-pay contracts".

Clearly it cannot be assumed that Yancoal would defer commencement of the project in a low coal price environment.

Adding to the prospect of the project being commenced despite continued or worsening coal prices, is the claimed importance to the saleability and price achieved for Duralie coal of blending with the higher quality Stratford coal.

## **5.0 Potential Contribution to NSW Coal Production & Royalties and Within Yancoal's Portfolio**

On a state-wide scale, the contribution of the Stratford Extension Project to the NSW economy would be small. According to DRE figures and Yancoal's Annual Report to Shareholders, in 2012-13 NSW produced 245.8 million tonnes of ROM coal, yielding 185.6 million tonnes of saleable coal. The total saleable coal production from all Yancoal operations was 16.9 million tonnes.

The average annual ROM production from the Stratford Extension Project would represent only 8.5% of Yancoal's 2013 production (a figure that would reduce as the Moolarben mine expansion is completed), and **only 0.79% of total NSW production** in 2013.

The NSW coal production in a single year (2013) is 11 times greater than the total proposed production over the entire term of the project.

The small potential contribution of the project to the coal industry in NSW should be a major consideration in determining the significance of the resource.

## **6.0 Increase in Importance of Other Matters as Significance of the Resource Reduces**

As noted earlier, the Mining SEPP stipulates that, in determining whether to grant consent to the proposed development, the weight to be given to matters other than the significance of the resource is to be proportionate to the importance of the other matter in comparison with the significance of the resource.

It follows that if circumstances such as a depressed coal market lead to a reduced significance of the resource then the importance of other matters, including the "residual matters" identified in the Preliminary Assessment Report increases proportionally.

The PAC concluded in its Review Report that noise and impacts on biodiversity are the two

most significant residual impacts, but that aspects of impacts on water, air and transport would need to be addressed before the project is submitted to the consent authority for determination.

The Review Report made 31 recommendations regarding DPE's Preliminary Assessment Report and proposed consent conditions, focusing largely on identified residual issues. In its Final Assessment Report DPE maintains that it fully agrees with 18 of these (and has incorporated them in revised conditions of consent). However it advises that it has not, for a variety of reasons, adopted the other 13 (i.e. 40% of the recommendations).

It is primarily for the PAC to consider whether DPE's reasons for not adopting those 13 recommendations are valid and acceptable. BGSPA considers some of the grounds to be incorrect, and comments on these later in this submission.

A particular concern however is that at least one of the 13 recommendations that DPE claims to have been accepted has not in fact been incorporated into the revised conditions. (That recommendation relates to meteorological conditions affecting the noise criteria and is one of the specific recommendations discussed later).

## **7.0 Low Confidence in DPE's Assessments**

DPE's assertion that it "has made concerted efforts to find ways and means to eliminate, reduce, mitigate or offset residual impacts of the project" lacks credibility.

Indeed where DPE has rejected recommendations from the PAC Review Report on the basis that they conflict with other instruments such as the new Voluntary Land Acquisition and Mitigation Policy there are very few instances where an attempt has been made to explore other ways of achieving the PAC's intent.

The conditions of consent now proposed by DPE include new provisions regarding financial contributions to Gloucester Shire Council. However virtually none of the other 84 recommendations made in the Council's January 2013 submission, nor the 49 recommendations made in the BGSPA submission, were accepted by DPE.

These recommendations were simply rejected by Yancoal in its response to submissions. It appears that few, if any, of the rejections were challenged by DPE. Certainly the Preliminary Assessment contains few references to, and very little analysis or discussion about, matters raised in submissions on the EIS. Rather, Yancoal's responses were directly incorporated into the Preliminary Assessment Report. In some instances, whole sections of text from Yancoal's response to submissions were copied unamended into the report.

Indeed, apart from where it has responded to PAC recommendations for changes, it is difficult to find instances where DPE's recommended consent conditions would require any more of Yancoal than the company had itself proposed.

In developing its Preliminary Assessment Report and proposed conditions DPE selectively excluded measures recommended by specialist agencies including the EPA. The inadequacy of its scrutiny of the EIS was highlighted by the failure to identify that a property central to

the biodiversity offset plan had incorrectly been shown as subject to a conservation covenant.

The selective rejection of information and recommendations that do not support the case for approval of the project has continued through the development of the Final Assessment Report.

The inclusion of superficially impressive but irrelevant DRE predictions of contributions to export revenue is one example. Others include: the claims of changes having been made to the conditions of consent to incorporate PAC recommendations when they have in fact been only partially incorporated; and the selective application of the new Voluntary Land Acquisition and Mitigation Policy in framing the proposed conditions relating to voluntary acquisitions.

These illustrations of lack of robustness and seeming lack of objectivity in the preparation of the Final Assessment Report serve only to undermine the public's confidence in the assessment process.

## **8.0 Continuing Over-Statement of Direct and Indirect Employment**

Potential employment generation is an important consideration in determining the significance of the resource.

DPE's Final Assessment Report (p14) takes issue with the PAC's questioning of Yancoal's claims regarding employment generation. Defending the claim of 250 direct jobs, DPE asserts that "neither Yancoal nor DPE's PAR suggested that the number of 250 direct employees was anything other than a peak number". Further, "It must be accepted that this number would scale up following commencement of the project, and scale down again towards project completion (unless a further mine expansion was subsequently sought and approved)".

This has important implications for the PAC's assessment of the merits of the project. Even putting aside the question of the veracity of the estimates of "peak" job creation, it is clear that for much or possibly most of the term of the project, the employment benefits would be less than the referenced 250 direct jobs.

DPE's testing of the claims regarding employment generation raises doubts about the rigour with which it has been undertaken. The Final Assessment Report (p14) states that DPE "considers it reasonable to estimate it would take twice the workforce (i.e. 250 employees) to operate twice the number of pieces of mobile equipment". But the proposed production limit from the extension project (2.6Mtpa) ROM is *less* than that of the current operations (3.1Mtpa). It is hard to see the company accepting such a substantial decline in its workforce productivity. Further, the 125 staff employed at the mine in 2013 included those working in the CHPP, train loading, maintenance, supervision, environmental and technical services. It cannot reasonably be accepted that the number of staff engaged in those activities would be doubled if the project were to proceed.

If, as seems to be the case, the figure of a (peak) direct employment of 250 is an over-estimate, it follows that DPE's "*conservative estimate* of the creation of up to another 250 positions" (i.e. indirect employment) is also an over-estimate. Whatever the correct figure may be, it must be recognised that the peak employment (direct and indirect) would not be for the full 11-year term of the project. For most of the term of the project the number of direct and indirect jobs would be well below that of the short "peak" period.

DPE's remark (p 15) that (at "peak employment") the "application of a multiplier of 2.0 would result in 500 people in NSW being employed who would not otherwise be employed given that the State's unemployment rate is hovering at about 5.8% *and the coal industry is shedding rather than employing workers*" defies logic. It is simply not credible that in an environment where adverse market conditions are leading to the shedding of employees across the coal industry, approval of the marginal Stratford Extension Project would relieve the employment downturn. If eventually the project *did* generate 500 indirect and indirect jobs it would not be expected to occur until years 9 and 10 of the project – i.e. 2025 and 2026 if the project were to commence in 2016. By then there may be an acute labour shortage in NSW.

## **9.0 Lack of Robust Economic Case for Approval of 24-hour operations**

The adverse impacts on surrounding residents of 24-hour mining operations have been detailed in submissions made to DPE and to the PAC concerning the project, particularly in submissions made by Gloucester Shire Council and BGSPA. As the PAC has been provided with copies of all of those submissions it is not proposed to re-state the arguments and recommendations in this document.

Nonetheless it cannot be over-emphasised that the issue of 24-hour mining operations remains a central concern of BGSPA, Gloucester Council and residents living around the project area.

In its Review Report, the PAC noted that while rejection of the proposal for 24-hour operations would presumably have some impact on the NPV of the project, it was likely to be much less than had been claimed. Similarly, the PAC found that the proponent's claims regarding payment for unutilised infrastructure "is plausible but the quantum claimed must be viewed with caution". Thirdly, the PAC noted that the proponent's claim, that without 24-hour operations the value of Duralie coal and hence profitability of the Duralie Coal Mine would significantly decrease, had not been quantified. Even if that were a critical justification for 24-hour operations, it would cease to apply beyond year 5 of the project.

The Review Report concluded that if the issue became determinative ***then the consent authority would require a robust re-analysis*** to allow assessment of the quantum of the impact of limiting mining operations to daytime hours. No further analysis has been provided.

In light of the substantial reduction in the "significance of the resource" arising from scrutiny of the originally claimed economic benefits and the sustained reduction in world coal prices, the adverse impact of 24-hour mining operations must be acknowledged as a determinative issue in judging whether the project is, on balance, in the public interest.

In the absence of a robust assessment establishing a strong economic justification, the proposed 24-hour mining operations should not be approved.

If however 24-hour operations were to be approved, the approval should be limited to years 1-5 of the project, since beyond that time the support of Duralie coal prices would cease to be relevant, and hence the claimed economic justification for 24-hour operations substantially diminished.

## **10.0 PAC Recommendations that Have Not Been Accepted by DPE**

Some 40 percent of recommendations made in the Preliminary Assessment Report have not been accepted by DPE and so are not reflected in the revised conditions. Among the 13 recommendations concerned are those relating to revision of existing negotiated agreements and the application of acquisition arrangements to properties where there is no existing dwelling.

In at least one instance (meteorological conditions affecting noise criteria) the final assessment report indicates that the recommendation has been adopted, but a critical part of the recommendation has in fact been omitted.

### **10.1 Negotiated Agreements**

The PAC's Review Report recommended that existing negotiated agreements with landowners should be reviewed and updated as necessary to take account of the proposed project and any relevant conditions of approval. DPE has not acted on that recommendation on the grounds that "*Yancoal is satisfied that the agreements which are in place cover all impacts from the project*".

That response misses the point. The existing agreements were negotiated in the context of impacts from the existing Stratford operations. The landowners involved were unaware of the proposed Stratford Extension project – including its proposed 24-hour mining operations – and were unable to take that into account. Had they been aware of the location, hours, and predicted impacts of the new project they may well have negotiated different terms in their agreement.

If the project is approved, the recommendation should be incorporated in the conditions of consent.

### **10.2 Acquisition and Mitigation Strategies**

The Review Report recommended that land acquisition should be included as an option if the noise or air quality criteria are predicted to be exceeded on more than 25% of privately owned land.

This recommendation has been rejected by DPE on the basis that under the new Voluntary Land Acquisition and Mitigation Policy for State Significant Mining, Petroleum and Extractive Industry Developments, "no vacant privately-owned properties (or privately-owned properties with a residence where the residence itself is not affected) need to be referenced in the conditions of consent for noise or air quality measures."



That appears to be incorrect. The new policy in fact provides that voluntary acquisition rights extend to properties where there is currently no dwelling, but *where a dwelling could be built under existing planning controls*. The policy does go on to say that because the application of voluntary mitigation rights are intended to protect human health and amenity, those rights *should not be applied to vacant land*. The apparent contradiction between those positions can only be logically resolved by taking the reference to vacant land as meaning land that is vacant and where a dwelling could not be built under existing planning controls.

If the project is approved, the recommendation should be incorporated in the conditions of consent.

### 10.3 Meteorological Conditions

DPE's proposed conditions provide that the noise criteria (in table 4, Schedule 3) are to apply to a receiver under all meteorological conditions except under wind speeds greater than 3m/s at 10m above ground level. (i.e. at wind speeds above 10.8 km/hour). The figure of 3m/s, at only just 0.9m/s above the annual average wind speed is an excessive concession. Under the proposed conditions, the noise criteria would cease to apply under wind conditions just 0.9m/s above the annual average wind speed.

However the figure of 3m/s appears to be a default figure derived from the Industrial Noise Policy (INP) which notes that this wind speed can noticeably increase noise received *down wind* of a noise source, but may not increase ambient noise levels to the point where they mask noise from the source and make it unnoticeable.

But it is illogical that a wind-speed concession should be applied when the wind direction is *away* from a receiver. It is critical that the proposed conditions of consent should be amended to provide that the wind-speed concession is *not* applicable when the wind direction is away from a monitoring point. Otherwise, combined with the exclusions relating to temperature inversions (which commonly occur in the area), the effect of the proposed conditions would be to render the noise criteria inapplicable under common or even typical local meteorological conditions.

In this regard, it should be noted that the PAC's recommendation on this matter has not been adopted by DPE in the revised conditions. The PAC recommendation was that the relevant condition should read:

"The noise criteria...should apply in relation to a receiver under all meteorological conditions except...b) **when wind in the direction from the source to the receiver** is measured at a speed of greater than 3m/s at 10m above ground level".

The PAC expressly stated that for the proposed exemption clause for gradient winds to be valid, it must include the requirement for the wind direction to be from the noise source to the receiver.

Logically, the same qualification should be included in the exemption allowed under temperature inversion conditions between 1.5 °C and 3°C/100m.

DPE's summary table of responses to the PAC's recommendations states that the relevant recommendation has been "Included in revised recommended conditions of consent *with minor amendments*". This is highly misleading as the "minor amendments" include the complete omission of the critical qualification (marked in bold above) in the PAC's recommendation.

If the project is approved, the full recommendation made in the Review Report should be incorporated in the conditions of consent (Appendix 6, conditions 1a and 1b).

## **11.0 Other Matters Relating to Residual Impacts**

The PAC noted in its Preliminary Assessment Report that while the residual impacts of the project cover a wide spectrum, noise was identified as one of the most significant.

### **11.1 Noise Mitigation on Request**

The proposal that owners of residences where the noise criteria exceed the nominal background noise level by more than 5dBA be entitled to request additional mitigations such as double glazing is intended to "safeguard residential amenity". However the proposed condition requires no measure of effectiveness.

The proposed condition should focus on the mitigation to be achieved, rather than on the nature of possible mitigation works. Characteristics such as building materials and design of affected residences will have a significant bearing on the practicality and potential effectiveness of measures such as double glazing. For that reason, the conditions of consent relating to additional mitigation-upon-request should expressly include flexibility that would allow for negotiation of other potentially more effective arrangements.

### **11.2 Haulage of Overburden**

The record of the PAC meeting with the proponent on 18/2/2014 sets out the following undertakings by Yancoal concerning restrictions that would apply to overburden haulage from the Avon North and Stratford East open cuts:

Avon North Open Cut – Proposed to operate 24 hours per day. Noise will be minimised at the site by restricting haulage of overburden to the North Waste Emplacement Extension to daytime only and haulage of overburden to the Stratford Main Pit predominantly shielded by 6m bunds;  
Stratford East Open Cut – Proposed to operate 24 hours per day. To minimise potential evening and night-time noise, overburden removal would be limited to day-time only during concurrent operations with Avon North, and haulage of overburden to the Stratford Main Pit would be restricted to day-time only due to the elevation of noise sources.

The EIS includes statements basically in line with those undertakings, but carrying the qualification that the restrictions would only *generally* apply.

This is an important noise mitigation measure. To ensure that it is implemented, a specific

requirement to apply the restrictions – omitting the qualification that they would only *generally* apply - needs to be incorporated in the conditions of consent.

### 11.3 Low Frequency Noise

Noise disturbance is a significant impact arising from current mining and coal processing operations. It occurs over a wide area and would seem to be greater than that predicted by noise modeling. The large number of complaints concerning intrusive noise lodged by residents located in areas where noise modeling and monitoring for current operations predict noise impacts below the current PSNL suggest that either the modeling is not a good indicator of potential noise impacts or the monitoring is not accurately recording noise levels. BGSPA's submission on the Environmental Impact Statement (January 2013) provides detailed analysis of residents' experiences.

It is clear from the Stratford Mine complaints register and previous submissions to the PAC from affected residents, that low frequency noise is an important source of noise disturbance. This has ramifications for many aspects of the project including the proposed 24-hour operations and the property acquisition provisions.

In response to concerns raised in the submissions that low frequency noise was not assessed adequately in the EIS, the PAC concluded that “.. if during regular attended compliance monitoring or monitoring for regulatory enforcement (e.g. at a residence in response to a complaint) it is evident that low frequency noise is present, then monitoring capable of assessing the low frequency noise component must be undertaken. Depending on the results, the appropriate modifying factor should be applied to the noise levels prior to comparison with the PSNLs”.

This was presented as a recommendation, which has been incorporated in the proposed conditions. However the intent of the recommendation is likely to be circumvented by the qualification “in accordance with the INP”. This is because in practice DPE relies on a narrow interpretation of the wording of a relevant section of the INP.

The INP (p.5) states that:

“a noise source may exhibit a range of particular characteristics that increase annoyance, such as tones, impulses, low frequency noise and intermittent noise. Where this is the case, an adjustment is applied to the source noise level received at an assessment point before it is compared with the PSNL to account for the additional annoyance caused by the particular characteristic.”

This is consistent with the PAC recommendation. However elsewhere in the INP document (p14), this position is restated, but with the inclusion of a qualification to the reference to low frequency noise:

“Where the noise source contains annoying characteristics – such as prominent tonal components, impulsiveness, intermittency, irregularity and **dominant** low-frequency content – adjustments as outlined in Section 4 apply.”

Inclusion of the qualifier “dominant”, and DPE's narrow interpretation of the term, renders this apparent safeguard largely ineffective in relation to low frequency noise. Hence a noise

profile may include a prominent, easily discernable low-frequency component, but unless it is the *dominant* component – which DPE takes to mean that the noise in that narrow band of 20Hz-250Hz is *greater than the combined noise at all other frequencies* – no adjustment is required.

This issue may be addressed in the current review of the INP, but it will not be completed within the anticipated timeframe for a determination on this project.

The relevance of this to the assessment of the Stratford Extension Project is that it appears that a residual impact affecting many residents around the mining complex, that the PAC believed could be mitigated, cannot in fact be addressed.

## **12.0 Conclusions**

The PAC's Review Report on this proposal was highly critical of a large number of aspects of DPE's Preliminary Assessment Report and its proposed conditions of consent. These included the use of coal prices so far above current and projected prices that they produced benefit estimates that were "simply not credible". In relation to biodiversity impacts, the PAC found that the mitigation strategies to protect the threatened Squirrel Glider for example, "would be ineffective".

The PAC's Review Report concluded, "on the information currently available, the merits of the project are too finely balanced for evaluation against the criteria in s.79C". The benefits of the project were found to be considerably less than claimed by the proponent, however the Commission noted that the residual impacts of the project could be reduced to a low level if its recommendations were adopted. Consideration of approval of the project would then be based on balancing low residual impacts against some (albeit smaller than originally claimed) benefits to the region and NSW.

At this late stage in the assessment process it is apparent that nearly half of the PAC's recommendations aimed at reducing the residual impacts to a low level have either been rejected or only partially adopted, leaving significant residual impacts undiminished.

The claimed benefits of the project – which the PAC found to be overstated – still have not been rigorously tested by DPE. The simple reckonings which comprise its testing of the claimed employment benefits of the project amply demonstrate this. The claimed royalties, dependent on the price of coal, have been reduced from the levels presented in the EIS, but are still optimistically high in light of current prices and projections of internationally recognised analysts including the World Bank.

In this submission BGSPA has made a number of recommendations concerning the need for further amendment of the proposed conditions of consent if the project were to be approved. For the most part they are not new recommendations – rather they are reiterations of some of the recommendations made in the PAC's Preliminary Review report that have been omitted from, or only partially incorporated in the revised conditions of consent.

Their adoption would assist in reducing important residual impacts.

However even if they were all incorporated in the conditions of consent, BGSPA does not believe they would sufficiently affect the balance of factors to be weighed by the consent authority to support a decision to grant consent for the project.

Barrington-Gloucester-Stroud Preservation Alliance  
4 May 2015

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