

Department of Planning and Environment
Locked Bag 5022,
Parramatta NSW 2124

Monday 11 December 2023

**Submission of Objection
SSD-6764-Mod-2
Workers Accommodation Facility**

Introduction

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC strongly objects to the proposed temporary workers camp on the Wilpinjong Mine site as not being in the public interest. The very poor assessment report provides no information regarding this development that has no demonstrable merit.

CWEC strongly supports the proposed reduction in the current approval boundary as having merit in the protection of Aboriginal cultural heritage sites and biodiversity values. This part of the proposed Modification 2 does have demonstrable public benefit.

Objection to the proposed temporary worker camp:

1. NSW Housing Policy

The NSW Government announced in September 2023 that '*Housing affordability and availability is the biggest single pressure facing the people of NSW*'¹. Also stating that '*Addressing the chronic shortage of housing across NSW requires a long-term plan*' with a focus on '*the delivery of social, affordable and private homes primarily in regional NSW.*'

¹ <https://www.nsw.gov.au/media-releases/rebuilding-essential-housing-across-nsw>

CWEC considers that the proposal to build temporary workers accommodation on Wilpinjong Mine site while failing to invest in maintenance of existing housing stock in the Wollar district works against the long-term plan for housing in regional NSW. The ensuing demolition of 'unsafe' housing is actively preventing the NSW Housing Policy aims from being achieved in the area. The only reason a large number of dwellings are unsafe is because Peabody Energy did not maintain them to the condition they were in when acquired.

2. Mid-Western Regional Council Community Plan

It is surprising that Mid-Western Regional Council is supporting this proposal when its adopted Community Plan, *Towards 2040*, has a goal supporting vibrant towns and villages. A better outcome for meeting this goal in Wollar Village would be supporting the maintenance of existing properties owned by Peabody Energy and advising the construction of new permanent housing to relieve the regional housing shortage. The proposed temporary workers camp will not meet the objectives and goals of the Community Plan.

3. Wilpinjong Extension Project Social Impact Management Plan

The most recent conditions of approval for the Wilpinjong Coal Mine operations require under condition 68 (e) that social impacts be mitigated through maintaining and managing land and assets owned by the company in Wollar Village.

This condition has not been met with the company allowing housing stock to deteriorate so that the demolition process is now the key focus. This is exacerbating the demand for rental accommodation for Peabody's own contractors and employees and also for the workforce employed to construct the Wollar Solar Farm.

4. Lack of information on environmental impacts

The assessment report lodged to apply for the construction of a workers camp on Wilpinjong Mine site, in a different location to the original approved site, has no information on any changed environmental impacts.

A significant change is that the new site is on a previously rehabilitated tailings dam. There has been no assessment of the stability of this rehabilitated landform or the level of disturbance needed to install the proposed 25 demountable buildings and associated support facilities including kitchen, laundry, dining and recreation areas plus water reticulation and wastewater disposal for 100 people.

There is no consideration of the potential risk of disturbing buried tailings either through construction activities or through wastewater disposal. The original approved work camp was anticipated to be used for approximately 6 months and then decommissioned. This Modification 2 proposes to occupy the new site for 5 years.

There is also no reference to the Wilpinjong Extension Project conditions requiring rehabilitation to meet Regent Honeyeater habitat credits as an offset for additional habitat loss. The consideration of whether this new proposed disturbance will hinder and slow the establishment of replacement Regent Honeyeater habitat has not been addressed.

The accompanying Bush Fire Assessment Report demonstrates the woodland revegetation on and near the disturbance site. There is no information provided in the main report about what has to be cleared or how this area fits in with new rehabilitation requirements.

5. No justification and no public benefit

The Wilpinjong Extension Project has been predicted in the Social Impact Management Plan to start winding back operations in 2025 and concentrate more on rehabilitation. This means the workforce will be smaller. There is no clear justification for Modification 2 for a workers camp on site until 2029/2030.

There is also no public benefit from this proposal. It will not help the NSW Government long-term plan for improved accommodation in regional NSW. It will delay the rehabilitation of the area to meet Regent Honeyeater habitat requirements. This critically endangered species listed as a Matter of National Environmental Significance under federal law cannot survive any further habitat loss or delays to habitat replacement.

6. Better public interest outcomes

A requirement for Peabody Energy to construct permanent housing in Wollar Village and to restore housing stock to safe rental standards would have a better long-term public benefit outcome than the proposed temporary workers camp.

Support for the excision of Crown Land from the approval boundary:

1. Protection of Aboriginal cultural heritage and land claim

The proposal to excise an unspecified area of Crown Land from the current mine approval and from EL 7091 will protect a number of Aboriginal cultural heritage values from destruction through mining activity. The acknowledgement of the Mudgee Aboriginal Lands Council land claim over this area of Crown Land is to be commended.

2. Protection of woodland ecosystems

The proposal to excise an unspecified area of Crown Land from the current mine approval and from EL 7091 will protect a significant area of woodland habitat. The reduction in open cut mining disturbance of 1.4 ha and reduction in approved surface development disturbance of 7.3 ha will save areas of woodland previously approved to be cleared. The reduction in Crown Land area in EL 7091 will also

protect these areas of woodland habitat from future exploration drilling activities and potential mine expansion.

3. Reduction in mine footprint reducing health impacts

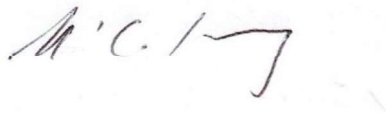
The proposed reduction in mining activity close to Wollar Village will also reduce dust and noise impacts that affect health, wellbeing and amenity in the district.

Conclusion

CWEC recommends that the proposed temporary workers camp on the Wilpinjong Mine site be rejected on the grounds of poor assessment of environmental impact, no justification under the current approval and no public benefit.

CWEC recommends that the removal of the Crown Land blocks subject to an Aboriginal lands claim from the current approved mine boundary and EL 7901 be approved as having merit and being demonstrably in the public interest.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. King', is written over a faint, circular official stamp or watermark.

Nick King
President

environmentcouncilcentralwest@gmail.com