



Department of Planning, Housing and Infrastructure
Attention: Brittany Golding
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7 August 2025

Dear Ms Golding

Re: Submission - Maules Creek Continuation Project (SSD-63428218)

I refer to the public exhibition (Case ID SSD-63428218) for the abovementioned Development Application for the Maules Creek Coal Mine (MCCM), which seeks approval to continue open cut mining operations within existing MCCM mining and exploration tenements for a further ten years from 2035 to 2044.

On review of the Development Application proposal and the documentation placed on exhibition, Council makes this submission to ensure that the impacts that the current project and the proposed project has on the Gunnedah Local Government Area (LGA) are identified. Council requests that should the consent authority decide to approve the Development Application, the following matters are appropriately considered.

It is noted that compared to the existing approved MCCM, the Maules Creek Continuation Project proposal would include the following additional key activities:

- Extension of open cut mining operations within CL 375, ML 1719 and AUTH 346 to allow mining and processing of additional coal reserves until approximately 31 December 2044.
- Extraction of approximately 117 million tonnes (Mt) of ROM coal (in addition to the approved MCCM coal resource of 240 Mt of ROM coal).
- Extraction of up to 14 Mtpa of additional ROM coal (i.e., a 1 Mtpa increase from the currently approved maximum ROM coal mining rate of 13 Mtpa).
- A revegetation program to establish approximately 2,300 hectares (ha) of native woodland in the vicinity of the MCCM (i.e., in addition to any offset and rehabilitation obligations).
- An increase in the operational workforce to an average of approximately 940 FTEs, with a peak operational workforce of approximately 1,030 FTEs, of which 30% are the local workforce.
- Construction workforce of 11 FTEs, of which 52% are the local workforce.
- Continued operation of the existing CHPP and train load out and rail spur infrastructure, with upgrades as required.
- Continued transport of up to 12.4 Mtpa of product coal via rail (i.e., no change to the currently approved maximum product coal transport rate).
- Development of an integrated waste rock emplacement landform that incorporates geomorphic design principles.
- Construction and use of a remote go-line, access and infrastructure area.
- Continued operation and extension of the MCCM water management system.
- Upgrades to workshops, electricity distribution and other ancillary infrastructure.
- Continued placement of coal rejects within the mined-out voids and the out-of-pit overburden emplacement areas.
- Construction and operation of a water transfer pipeline between the MCCM water pipeline network and the approved VCM to TCM pipeline.
- Ongoing exploration activities.
- Other associated infrastructure, equipment and activities.

In order to inform the Submission, Gunnedah Shire Council commissioned REMPLAN to develop an Infrastructure and Services Impact Model (ISIM) to quantify the impacts of the Maules Creek mining activity on selected local services and infrastructure within the LGA. The modelling includes the mix of local and non-local workers directly employed during the project, and the location of these workers. The results of the ISIM were presented under two scenarios:

1. Population Growth - Impact of population and dwelling growth (NSW DPHI population forecasts). This is an assessment of the official NSW Government resident population projections on the demand for additional professional service requirements, and the subsequent impact on roads. This scenario does not include the transient (non-local) population generated by mining activity.
2. Impacts of Mining Activity - Workforce/population impacts of the Maules Creek Continuation Project on demand for infrastructure and professional services for the three phases of activity: construction; operation; and closure. The mining activity impacts on road infrastructure are also modelled.

Population Growth

- As stated in the project proposal, the Maules Creek Continuation Project is proposed to employ 937 people over the operation period. While the mine is located within the Narrabri LGA, REMPLAN modelling identifies the Gunnedah Shire housing 487 new working residents during the Operation Phase. The NSW government (DPHI) forecast an increase in population of 676 people between 2021 and 2041 in Gunnedah LGA. New working residents have an associated population multiplier generating a total 1,228 of new residents during the years of operation. Over the next 20 years, the mining population will more than double the projected forecast population growth (from 676 people to 1,904 people) – resulting in significant implications from a strategic, community and infrastructure perspective for Gunnedah LGA, Council and residents.

Dwelling Growth

- The forecast for Gunnedah LGA housing growth is an additional 535 dwellings between 2021 and 2041 according to DPHI data, slightly under the 580 dwellings targeted by Council's Gunnedah Housing Strategy. The additional direct and indirect workforce needs of the Maules Creek Continuation Project will absorb and impact housing growth, requiring additional investment by Whitehaven Coal in worker accommodation to ensure equitable growth.

Employment and Local Jobs Creation

- The LGA has one of the lowest employment rates in NSW and skills and labour shortages continue. Ensuring strategies are in place to address the migration of trained workers from local businesses to the mining industry, and ensuring each industry in the LGA has sufficient resources to thrive, is of paramount importance to Council. Displacement of employment opportunities from the agricultural sector also needs to be considered within the social and economic assessments. Training programs, graduate placements in industry and community grants grow human capital by building competence, skills and knowledge, education and experience.
- Council acknowledges that jobs creation in the mining sector and associated industries supports the retention of young people in the Gunnedah LGA and recognises that the availability of jobs that the Maules Creek Continuation Project will bring, over time, has the potential to draw young people back to their community to work, live and raise families. Council advocates for the operations to prioritise and consider employing local, and for any efforts to incentivise young people to move into the mining sector where relevant, when any future recruitment is required.
- Council agrees that the incremental disposable income of those additional workers would value add to the LGA and Region's economic and social vibrancy.
- 2021 ABS Census data shows that the 15.6% of Gunnedah LGA and 16.9% of the Narrabri LGA identifies as First Nations. Council acknowledges that the Project currently employs 80 (14%) First Nations employees, however Council will always advocate for ongoing efforts to be made to proactively source Aboriginal and Torres Strait Islander trainees and apprentices from within the surrounding local communities to future proof the cultural integrity of those LGAs.

- Council acknowledges and supports the assertion on Page 21 of the SIA by Aboriginal community members and stakeholder groups that “fair employment practices, pathways to employment for Aboriginal People, as well as culturally appropriate and sensitive employment practices” are important to mitigate perceptions of familial bias.

Housing and Rental Affordability

- Findings in the Gunnedah Shire Local Housing Strategy, clearly show that the current median house price in Gunnedah, while marginally lower than Narrabri, is higher than both Tamworth and Boggabri and this upward trend has no signs of slowing. Official state government population and dwelling projections prepared by the NSW Department of Planning, Housing and Infrastructure (DPHI) indicate that the Gunnedah LGA is projected to experience an increase in population of 676 people between 2021 and 2041, representing an increase of 5.2% over the 20 years, or a compound annual rate of growth of 0.3% per annum. Current population growth trends indicate that a further 580 dwellings will be required by 2041 to meet housing demand. With the continuation of the Project attracting new workers to the region, it is logical that a large portion of those workers will opt to reside in the Gunnedah LGA, as workers opt for lifestyle and quality of housing and livability over proximity to the mine site. Despite the assertion that this is a “national trend” the reality that this influx of workers during all phases of the Project, will place further strain on the availability of affordable housing to lower income families and individuals, remains credible.
- The extension of the mining operations life by an additional ten years will continue to drive up the cost of housing and rentals in the LGA, forcing local residents and those unable to compete with mining salaries out of the market and out of the LGA. The village of Curlewis, 19 km south of Gunnedah has already seen a significant increase in property prices in the last 12-18 months and is now considered by residents to be a ‘mine village’.
- It is noted that Whitehaven has invested in housing developments in Gunnedah, Narrabri and Boggabri (SIA 5.2.4). Whitehaven’s plans to consider supporting expansion of housing in Narrabri, Gunnedah and Boggabri, with a focus on affordable housing should the housing market remain constrained when the project proceeds (SIA Table 14 p.75) leaves further investment too late and this should be brought forward.

Health Professionals and Emergency Services

- Gunnedah LGA is already experiencing impacts through the lack of availability of doctors, police and other service professionals. REMPLAN modelling indicates the continuation project has the potential to further impact demand for additional service professionals in all 3 phases of the development, most notably the operational phase.
- Construction Phase: With a low employment base, the construction phase is expected to generate limited demand for professional services. The average annual demand for additional service workers in the construction phase from 2028 to 2032 (using New South Wales average rates of provision) is 0.4 Health professionals, 0.4 Education professionals and 0.1 Safety and Security workers.
- Operational Phase: Modelling identifies 487 workers residing in the Gunnedah LGA, generating a total population of 1,228 residents. On an annual basis, the operational phase is estimated to generate demand for an additional 16.7 Health professionals, 28.3 Education professionals and 4 Safety and Security workers.
- Closure Phase: Consists of 244 resident workers generating total population of 615 residents and will also generate demand for additional professional services.
- It is noted that there will also be an impact when non-resident workers access health professional and emergency services which is not quantified.

Road Infrastructure

Based on the Road Transport Assessment prepared for the Maules Creek Continuation Project Environmental Impact Statement, Council estimates:

- a) the total direct impact on road infrastructure **over the life of the mine** (2025-2044), including construction, operation and closure phases, is estimated to be \$1.5 million – an average annual impact on the road infrastructure of \$75,017 per annum. Direct impact relates to road trips directly related to mining activity.

- b) The total population based indirect impacts on road infrastructure over the life of the mine for the additional dwellings required to support new jobs in Gunnedah, is estimated to be \$15.5 million – an average annual impact on the road infrastructure of \$777,164 per annum.
- c) The total direct (mining) and indirect (population) impact on road infrastructure attributed to mining activity over the life of mine is estimated to be approximately \$17 million, or \$852,181 per annum.

Stakeholder Engagement

- Council acknowledges the Project's efforts to engage with stakeholders, in particular Aboriginal stakeholder groups. Consultation however does appear Narrabri centric with few public and private service providers and organisations consulted in the Gunnedah LGA. While the community organisations consulted are not listed in the SIA Section 3.1.3 Table 1, Council would like to reinforce the importance of consulting with family crisis and social support organisations in both the Narrabri and Gunnedah LGAs to determine potential impacts on their services due to the proposed increase in operational workforce and the likelihood of supporting partners and families moving to both LGAs. Also noted is the lack of consultation with the State Emergency Service to determine potential flood impacts of the proposed water management strategies, changes to landform and extended mine life.
- The Gunnedah LGA continues to experience significant economic and social growth and reinforces that the Project's ongoing meaningful and timely engagement with key stakeholders including Gunnedah Shire Council is expected.

Community Contributions and Voluntary Planning Agreements (VPA)

- It is Council's view that the Social Impact Assessment does not adequately address key economic and social impacts and pressures that the additional increase in mine life by 10 years places on the community let alone the significant unmitigated impacts on our community since construction works commenced in December 2013 and the mine first commenced operations in 2015. Despite feedback provided to inform the SIMP and comments made on impacts on housing, access to emergency and medical services, childcare and projected population growth, the SIA's narrative remains Narrabri centric and inequitable in its response.
- Council considers that the SIA has determined that the distribution of workforce is disproportionate between the Gunnedah LGA and Narrabri LGA with a significantly greater impact being felt on the Gunnedah community to that of the Narrabri LGA. It is noted that the community impacts were addressed with the entering into a VPA between Narrabri LGA Council and the proponent during the determination of the original development application. This Development Application gives the opportunity for the developer to address the impacts to the Gunnedah LGA with a similar condition and agreement.
- The Appendix K Economic Assessment also notes Narrabri Shire Council receives more than \$1million annually in rates payments, a direct contribution to roads and other Council services. However, there is no information regarding any proposed VPA proposed for Gunnedah LGA. Hence, the Development Application does not address how the development will adequately manage the infrastructure and social impacts to the Gunnedah LGA.
- The Gunnedah township is recognised as the main mining industry service centre of the Gunnedah Basin, and Council considers the formulation of a VPA as an essential next step to offset any negative economic and social implications that this Development Application will incur on the wider Gunnedah LGA. Historically, developers have been unable to enter in to VPAs with other LGAs where the development location is not physically within the boundaries of the local government area. However, this system was flawed as it did not account for the social and economic impacts that could be created across LGA boundaries by developments such as this one.
- As noted previously, the Project operates with a large percentage of its workforce choosing to reside within the Gunnedah LGA, with Gunnedah Shire Council and the community having to address the social and economic impacts that this creates. Social and economic impacts from the development and an extension of mine life by 10 years, are derived not only from the number of employees or contractors employed at the mine, but also family members of workers residing within these communities and the additional pressures that these create for our LGA.

Legislation now allows for VPAs with communities such as ours, that are significantly impacted by a development in an adjoining LGA. Accordingly, Council requests that the social and economic impacts from the development be appropriately addressed through a VPA or other similar means. Council suggests that a Planning Agreement be developed between Gunnedah Shire Council and Whitehaven Coal Pty Ltd in accordance with Part 7, Subdivision 2 of the *Environmental Planning and Assessment Act 1979*.

Council notes that other similar developments have yielded VPA agreements that default to 1% of capital expenditure. The ISIM that Council has had developed has determined that the quantum of direct and indirect impacts on road and other community infrastructure is in the amount of \$17m. This figure would mean that a similar application of community contributions would not be consistent with previous VPAs, and such a 1% capex determination would not be appropriate in this instance. Council suggests that in this instance that it is also inappropriate due to the application being an extension to the existing MCCM, with the bulk of capital costs related to the extension of the development having already been incurred and therefore if DHPI or IPC was to again deem 1% of capex as its preferred determination of impact, that the 1% should be calculated on the entire development capital costs. The referenced ISIM can be provided to DHPI or IPC upon request. Council notes that the original Narrabri LGA VPA yielding \$13m in local funding for the Narrabri LGA. Hence, it is reasonable to expect that VPA contributions would be apportioned based on the percentage of impact on the Gunnedah LGA.

Landscaping Revegetation Zones

Council also questions the period at which the revegetation program within the three Landscape Revegetation Zones, indicated to be approximately 2,300 hectares in total, is scheduled to occur. The development has indicated that the proposed development would result in removal of 676.6ha of vegetation, with appropriate offsets being retired or offsets credits paid, and that these Landscape Revegetation Zones would create connective habitat across the landscape. However, these works are not to be conducted until three to five years into the ten-year operational life of this consent being sought.

The resulting displacement of fauna and the loss of habitat during the construction and operation of the proposed development is likely to result in loss or displacement of fauna that occupies the current forested footprint of the site that proposed works will occur on. Section 7.1.5 of the Biodiversity Assessment Report indicates that the loss of habitat from the development would increase competition for resources and diminish niche microhabitat, resulting in chances for stress to fauna and potential starvation. Council suggests that to limit the loss of habitat and impacts to biodiversity, the proposed creation of additional habitat and links with other existing areas of habitat created by the Landscape Revegetation Zones could be considered to occur earlier in the project or prior to the project commencement date. The developer should consider the timing of this revegetation efforts to ensure that the indicated purpose for the works is realised.

In summary, the following impacts of the Maules Creek Continuation Project are as stated.

1. Potential positive accumulative impacts relevant to the Gunnedah LGA:
 - Continued contribution to the region's economic resilience, especially through a share of \$2.2b (in Net Present Value) of expected additional expenditure with NSW suppliers.
 - Continued contribution towards the population growth of the LGA.
 - Continued capacity to provide enhanced opportunities for local employment and training for LGA residents.
 - Retention of the existing workforce and potential to retain those workers and the families in the local areas.
 - Extended opportunity to support businesses and industry in the Gunnedah LGA through an ongoing commitment to local procurement and investment.
 - The provision of financial contributions that support positive socio-economic outcomes, social infrastructure investments and/or community resilience improvements; and
 - Potential for reduced flood impacts through the implementation of the operation's Landscape Revegetation Project that will result in the 50% reduction in the final void catchment area on the completion of mine life.

2. Potential accumulative negative impacts relevant to the Gunnedah LGA:
 - Ongoing community anxiety, concerns and assumptions round overall environmental impacts of mining and climate change, and the resultant impacts to residents and landholders' way of life:
 - Continued operational noise, dust and lighting impacts affecting the quality of life of nearby landholders.
 - Ongoing landholder concern around equity of access to groundwater for landholders, and the ongoing preservation and security of groundwater supply and quality, particularly during times of drought.
 - Continued potential for disturbance to Aboriginal sites of cultural importance.
 - Continued negative impact on housing and rental market availability and affordability.
 - Continued negative impact on childcare supply and demand, with wait lists extended beyond current timeframes: and
 - Increased demand on Council, health, social support and emergency services by both domiciled and transient workers and immediate and extended family members.

Conclusion

Council wishes to reaffirm that this submission is not an objection to the development application. However, there is a strong belief that the assessment and the Development Application has not adequately considered and accounted for ongoing, significant impacts to the Gunnedah LGA.

While there will be no change to hours of operation and site access, and despite mining operations located wholly within the Narrabri LGA, all phases of the mine life are expected to impact the demand for services in the Gunnedah Shire, with the operational phase having the greatest impact. Council once reinforces once again, that given the proximity of the Gunnedah LGA and Gunnedah township and the significant number of employees and contractors choosing to reside in the LGA and commute to the site, there will continue to be direct and indirect impacts associated with the extension of operations for a further ten years.

As mentioned previously, the ISIM commissioned by Council puts the impact of the current proposal at around \$17m. This does not take into account the unmitigated impacts of the mine from 2013 when works commenced. As such application of a 1% of CIV VPA quantum for this extension project would not be adequate and a quantum of 1% of the entire development cost must be considered.

Adequate practices and actions must be put in place by the development to lessen those impacts on our community. If you have any questions regarding this matter, please contact me on 02 6740 2100.

Yours faithfully



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