



Hunter Environment Lobby Inc.

202 High St
East Maitland NSW 2323

Genevieve Lucas
Contact Planner
Department of Planning and Environment
Locked Bag 5022,
Parramatta NSW 2124

Monday 4 December 2023

Dear Ms Lucas

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

Hunter Environment Lobby Inc. is a regional community-based environmental organization that has been active for over 30 years on the issues of environmental degradation, species and habitat loss, and climate change.

We object to this application to modify the Wilpinjong Extension Project (WEP) to construct temporary accommodation for approximately 100 workers on the Wilpinjong Mine site for a period of approximately 5 years. The assessment report provides no detailed description or analysis of a number of environmental impacts associated with this proposal.

The original approval for a temporary workers accommodation facility was at a different site and therefore, the information relating to this new proposed site needs to outline the differences in environmental impact.

1. Water supply

There is no detailed description about the source of potable water or water supply for bathroom and laundry use and no estimate of volumes of useage. The only reference to water management under Section 6.1 refers to an extension of the exiting on-site sewerage and effluent treatment without offering any further detail.

There is reference to a potential update of the Surface Water Management Plan without outlining what this might entail.

The assessment report only refers to the non-specific construction approvals for WEP without describing what will be required for the modification and what these impacts will be:

- *Progressive development and augmentation of dams, pumps, pipelines, up-catchment diversions, drains, storages and other water management equipment and structures.*
- *Construction and installation of ancillary infrastructure (e.g. internal roads, electrical infrastructure, potable water supply, sewage treatment facilities, site communications, remote crib huts and security).*

2. Biodiversity and rehabilitation requirements

The Bush Fire Assessment Report provides more information about the construction site than the main assessment report. It is noted that there is regenerating woodland on the site identified for disturbance.

The assessment report states that *'There would be no additional surface disturbance of remnant vegetation as the construction footprint has already been disturbed by mining operations.'* However, there is no reference to the area of regenerating woodland likely to be disturbed or to the requirements of the WEP approval to rehabilitate the mine site to offset Regent Honeyeater credits caused by loss of habitat. The area of the site is approximately 81.23 ha and contains bush fire prone land.

There is no description of the rehabilitation requirements of the site after decommissioning in 5 years or how this may slow down the overall achievement of the Regent Honeyeater offset requirements.

3. Justification for the temporary workers accommodation

We note that the WEP will start winding back production and mining activities in 2025. This will cause a reduction in workforce and a reduction in demand for accommodation associated with the Wilpinjong Mine. There is no clear justification for temporary on-site accommodation for 100 people for 5 years. Peabody Energy owns most of the property and houses in the Wollar district. It would be a better social outcome for the Mid-Western Regional Council area to have new permanent housing constructed in Wollar Village and existing housing stock renovated to rental standards.

We do not agree that it is in the public interest for a temporary workers accommodation facility to be constructed on a mine site that will soon be winding down production. Public interest would be best served by construction of new permanent houses and renovation of existing houses in Wollar Village.

4. Reduction to approved surface development area

Hunter Environment Lobby fully supports the modification proposal to reduce the area of the mining lease over Crown Land. We support the reduction of 7.3 ha from the approved surface development area. This will protect a number of Aboriginal cultural heritage sites and areas of woodland vegetation from disturbance.

Yours sincerely



Jan Davis
President