

# **WOLLAR PROGRESS ASSOCIATION**

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**WOLLAR NSW 2850**

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

Friday 15 December 2023

## **Submission of Objection: SSD-6764-Mod-2**

Dear Ms Lucas,

Wollar Progress Association is objecting to the proposed temporary workers camp on Wilpinjong Coal Mine while supporting the exclusion of an area of Crown Land from the current approval boundary.

Our community has suffered significant social impacts from the expansion of the Wilpinjong Coal Mine since its initial approval in 2006. These cumulative impacts have not been adequately mitigated by the current Social Impact Management Plan (SIMP) adopted in 2019, as a condition of approval of the Wilpinjong Extension Project (WEP) in 2017.

We strongly object to the proposed temporary workers camp for a number of reasons that will be expanded on in this submission:

1. Different proposal to the approved temporary workers facility in the original application in 2005.
2. Poor information in the Modification Report
3. No justification or public benefit
4. Poor social impact outcomes
5. Failure to demonstrate responsible corporate citizenship

We consider that a more positive social outcome could be achieved that helps to meet the NSW Housing Policy for regional communities and the Mid-Western Region Community Plan through a long-term solution to the regional housing crisis. The future of the Wollar Village and community could be secured through a commitment by the Applicant to replace demolished permanent housing and maintain existing residences to rental standards.

Wollar Progress Association supports the proposed reduction of the approved mining boundary to excise Crown Land subject to an Aboriginal land claim.

## Key points of objection to temporary workers camp:

### 1. Different project to current approval

The currently approved temporary workers camp was on an undisturbed agricultural land site. It was proposed to assist accommodation for construction workers for a period of approximately 6 months. This project was not developed. The information associated with the approved project was very limited in the original 2005 Environmental Impact Study.

‘All items would be constructed in accordance with local government requirements, including sewerage and other waste disposal systems. Potable water would be trucked to the site and a water supply reticulation system would service the appropriate areas across the construction camp. Electricity demand would be met by using the existing 11 kV supply system, supplemented with on-site diesel generator-sets when required.’<sup>1</sup>

‘The majority of the construction works would be completed in the first six months of the Project. The construction camp would be utilised until the CHPP is fully commissioned. The temporary access road would be closed upon decommissioning of the construction camp.’

The proposed modification of the WEP approval is for a similar sized development for a period of five years on land that is a remediated tailings dam. The Modification Report does not provide any detailed assessment of the necessary provisions or impacts.

### 2. Poor information in the Modification Report

#### 2.1 Effluent

The Modification Report provides no detail on the sewerage and waste disposal systems. Figure 3<sup>2</sup> shows a pipeline and sewerage treatment plant in an insert. The only reference is to: ‘package sewage treatment plant and associated on-site effluent irrigation area’<sup>3</sup>

There is no further description in the report itself. The only other references include the generic approval for construction activities in the WEP:

- Progressive development and augmentation of dams, pumps, pipelines, up-catchment diversions, drains, storages and other water management equipment and structures.
- Progressive development of haul roads, light vehicle access roads and services.
- 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).<sup>4</sup>

Under the assessment of water management:

‘Any additional sewage generated at the temporary accommodation facility would be managed consistent with the existing on-site effluent treatment and management processes within the existing operational water management area.’<sup>5</sup>

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<sup>1</sup> Excel 2005. Wilpinjong Coal Project. Main Report Section Two p 2-24

<sup>2</sup> Peabody, November 2023. Modification Report p 5

<sup>3</sup> Ibid p 6

<sup>4</sup> Ibid

<sup>5</sup> Ibid p 14

There is no description of where the effluent from the sewerage treatment plant in Figure 3 will be disposed or how it will be moved (pipeline routes, irrigation areas etc). If the 'on-site effluent irrigation area' is onto the remediated tailings dam, there is no assessment of these impacts. There is no assessment of how this additional effluent disposal will meet the requirements of the Environmental Protection Licence 12425 (04 Effluent application to land).

## 2.2 Potable Water

The original approval describes that potable water for the workers camp will be trucked in. There is no information provided about the number of potable water trucks or source and volume of water provided for existing offices, workers cribs and ablutions blocks on the mine site. There is also no information about the additional water supply for up to 100 people living on the mine site. There is no information about the number of additional water trucks needed and any increase in traffic movements to the mine site. There is no indication whether the mine has now found an alternative water source since approval.

## 2.3 Site Description

The Modification Report fails to adequately describe the site proposed for 25 demountables, plus kitchen and dining area, wet mess, laundry, recreation area and ablutions blocks. The proposed site is on the Pit 1 remediated tailings dam.

'The temporary accommodation facility would be located to the west of the rail loop on an existing (partially rehabilitated) previously mined and backfilled area of Pit 1 (Figure 3).'<sup>6</sup>

There has been no description of the age, stability or materials providing the foundation of this rehabilitated landform. There is no assessment or description of the level of disturbance needed to install the proposed temporary workers camp, its reticulated water supply or effluent disposal.

The only reference is that the area has already been disturbed in regard to vegetation removal with no additional information about the nature of the disturbed land:

'There would be no additional surface disturbance of remnant vegetation as the construction footprint has already been disturbed by mining operations (Figure 3).'<sup>7</sup>

The Bushfire Assessment Report provides some additional information about the revegetation on the site. It does not refer to what vegetation may need to be removed for the construction of the camp or for the additional fire risk management recommendations. We note that the area is assessed as bushfire prone land and that Wilpinjong Mine staff will be called on to manage any fires in the area.

The report identifies that no ecological assessments have been undertaken on the site and that impacts on Aboriginal heritage will be addressed separately in the Modification Report.<sup>8</sup> However, we cannot find any reference to Aboriginal heritage sites on or near the area proposed to be disturbed. The key reference to Aboriginal heritage is in regard to the protection of an area of Crown Land from mining impacts.

The Modification Report notes that a number of environmental management plans may require review and update without proffering any detail on what this might entail and what the environmental triggers may be. We presume this is in anticipation of Department of Planning

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<sup>6</sup> Ibid p6

<sup>7</sup> Ibid p11

<sup>8</sup> Barnson, September 2003. Bushfire Assessment Report p 4

and Environment conditions of approval. However, we are concerned about the very limited information provided to enable robust assessment by decision-makers:

Notwithstanding, WCPL would review and update the following environmental management plans to incorporate the temporary accommodation facility (if required):

- Social Impact Management Plan.
- Rehabilitation Management Plan.
- Blast Management Plan.
- Air Quality Management Plan.
- Noise Management Plan.
- Surface Water Management Plan.<sup>9</sup>

#### 2.4 Rehabilitation requirements

We note from the photographs of vegetation provided in the Bushfire Assessment Report that the rehabilitation around the site area is already providing woodland habitat and appears to be well established. The disturbance needed to construct the temporary workers camp and reduce fire hazard risk has not been adequately described.

The WEP required removal of additional Regent Honeyeater habitat that resulted in all rehabilitated mine land providing offset credits in the form of suitable vegetation types for this critically endangered species. There is no description of whether the workers camp site already meets these habitat requirements or is an area that will have to be revegetated to provide offset credits. The proposed workers camp for a five year period is likely to disturb or delay the required rehabilitation requirements on this area of the mine site. There has been no assessment or discussion of this matter in the Modification Report.

### 3. No justification or public benefit

There is no demonstrated justification for this development application to provide temporary workers accommodation for 5 years until 2029/30. The current WEP approval is based on a wind down of coal production by 2025 and increased mine rehabilitation activities. The WEP Social Impact Management Plan (SIMP) refers to 'workforce ramp-down arrangements from 2025' and 'Operational employment at WCM is expected to decline from 2025' <sup>10</sup>

The SIMP also predicted that 'The Project is unlikely to have a significant adverse effect on temporary accommodation capacity'.<sup>11</sup> The change in accommodation availability in the region caused by increased renewable energy development is part of the transition away from fossil fuels and fits with the ramp-down of coal production at Wilpinjong Coal Mine.

We note that the letter from Mid-Western Regional Council refers to the Council's policy position on housing operational personnel is for those personal to be accommodated in market housing. We support this policy and note that Council has previously objected to workers camps in the area, for example on the proposed Bylong Mine site. There has been no consultation or communication with Wollar Progress Association from either the Applicant or Mid-Western Regional Council on this matter of a proposed temporary workers camp on the Wilpinjong Mine site.

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<sup>9</sup> Ibid p 14

<sup>10</sup> Peabody, June 22. Wilpinjong Coal Social Impact Management Plan p 19 & 20

<sup>11</sup> Ibid p 80

It is concerning that the letter of support from Mid-Western Regional Council is dated 19 June. This reveals that the Applicant had been in consultation with Council in early June and yet did not consult with the Wollar community or the Wilpinjong Community Consultation Committee (CCC) at its June meeting. The community was only made aware of this proposal through a very short presentation at the September CCC meeting.

There is no enduring public benefit from the proposed temporary workers camp. The only beneficiary will be Peabody, the owner/operator of Wilpinjong Mine. The company owns the majority of houses and property in the Wollar district and should have the capacity to provide accommodation for workers and contractors by maintaining housing stock to safe rentable standards. This accommodation would then be managed through the rental market, meet the Mid-Western Regional Council policy, and provide long-term public benefit by ensuring housing availability into the future.

#### 4. Poor social impact outcomes

The proposed modification of the WEP is a lost opportunity to mitigate the social impacts of Wilpinjong Mine on the Wollar community. It is also a lost opportunity to address the failure to meet conditions of approval that require mitigation measures to 'maintain and manage land and assets owned by the Applicant in Wollar Village' (Condition 68 (e) ).

One of the objectives of the SIMP is to 'Maintain the amenity and character of the Village of Wollar by maintaining and managing company-owned land and assets.'<sup>12</sup>

This objective and mitigation measure would be best met by the investment in restoring existing housing stock to safe, rentable standards and construction of new permanent housing that will benefit the Wollar community in the future once Wilpinjong Mine has ceased operation in 2033.

Investment in an unjustified 5 year temporary workers camp on the mine site will have poor long-term social impact mitigation for the Wollar community. The construction of 20 three bedroom houses on vacant blocks in Wollar Village will solve the current accommodation needs for employees and also help solve the regional housing crisis into the future.

#### 5. Failure to demonstrate responsible corporate citizenship

Peabody has failed to demonstrate responsible corporate citizenship in the Wollar district by not adopting effective property maintenance and management principles on acquisition of houses and land. Good condition, safe, rentable housing has been neglected and allowed to deteriorate and be vandalised so that now the company has resorted to demolishing abandoned houses rather than maintaining them.

The company failed to include specific issues raised by Wollar Progress Association during the SIMP development. The request for a property management and maintenance plan was deliberately excluded from the SIMP. This is reported in Table 5 *Stakeholder inputs not incorporated in SIMP measures*.<sup>13</sup> The following social impact mitigation measures relating to housing management were deliberately ignored:

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<sup>12</sup> Peabody, June 2022. Wilpinjong Coal Social Impact Management Plan p 23

<sup>13</sup> Ibid p 16

Place mine-owned residences on the rental market to encourage families with primary school-aged children to move to the Village of Wollar.

Place mine-owned vacant land, including land with demolished houses, for sale on the property market.

Develop and communicate a building maintenance program for mine-owned residences

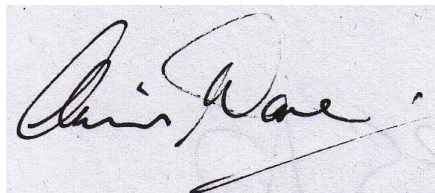
These rejected social impact mitigation proposals were aimed specifically at keeping housing availability and community building opportunities in the district. Instead the company is now relying on only one part of the SIMP, that was not suggested by Wollar Progress Association, to demolish a minimum of 5 houses per year. Abandoning maintenance responsibilities until properties become unsafe is an abrogation of duty of care.

Peabody has made significant profit from the Wilpinjong Mine over a period of time, to the extent that the mine was used to avoid a parent company debt default at the end of 2020. Investors were informed that Wilpinjong was one of Australia's biggest coal mines and had lower production costs than 90 per cent of Australian coal mines.<sup>14</sup>

Wollar community expects that the extreme social impacts from the Wilpinjong Mine would be better mitigated with some socially responsible investment in housing availability in the district rather than the proposed temporary solution to the region's housing crisis.

It would be greatly appreciated if Peabody demonstrated some corporate social responsibility by investing some of its profits into reconstructing the Wollar Village rather than to continue demolishing it.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Ware', with a long horizontal stroke extending from the end.

Christopher Ware  
President

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<sup>14</sup> [afr.com/companies/mining/banpu-pumps-another-150m-into-australian-coal-20210108-p56sn7](https://afr.com/companies/mining/banpu-pumps-another-150m-into-australian-coal-20210108-p56sn7)