

23 October 2025

Department of Planning and Environment
Major Projects Assessment
NSW Planning Portal

RE: Wilpinjong Coal Mine – SSD-6764-Mod 3 (Pit 8 Extension) — Formal Objection

To whom it may concern,

We write as the owners of a rural holding that lies within the impact zone of the proposed Pit 8 extension. We are establishing a deer farm and have experienced ongoing amenity impacts from existing mine operations. This submission formally objects to MOD 3. The proposal is not a minor change; it materially expands disturbance, prolongs mining, and realigns Ulan-Wollar Road in a way that further erodes residential amenity, agricultural viability and local social fabric.

1) Scale, expansion creep and cumulative harm

Wilpinjong has operated with serial expansions since 2006, with significant social consequences for Wollar. The town is now essentially a shell. The Pit 8 extension continues a pattern of ‘scope creep’ and cumulative harm in which promised limits and timeframes shift while impacts compound. On the proponent’s own material, MOD 3 extends life of mine and increases total disturbance, including vegetation clearing and works at the village interface. The Department must assess not only the incremental change, but the cumulative reality now borne by remaining residents.

2) Access, traffic and public infrastructure risk

The realignment would push Ulan-Wollar Road toward the Sandy Hollow–Gulgong rail line and create a new intersection at Mogo Road. During construction our sole access will face delays, detours, heavy-vehicle conflicts and utility relocations. We are also not confident that there will not be greater impact not stipulated or long-term disruption. As with any large-scale project, many difficulties cannot be foreseen. Post-commissioning, queuing at the rail crossing and increased heavy-vehicle movements will exacerbate safety concerns and dust. Given current degradation of the unsealed portion of Mogo Road and likely blast-related vibration effects (current and exponential impact give the proposed expansion), the proponent must fund full-depth sealing of Mogo Road from the new intersection to the national park, with drainage upgrades and ongoing maintenance.

3) Noise, low-frequency noise and blast vibration — risks to residents and livestock (deer)

Existing mine noise already disturbs sleep and causes anxiety at our home, with multiple complaints recorded along Mogo Road. The extension would move blasting and haulage closer, increasing low-frequency components that travel further at night and in certain atmospheric conditions. Deer are highly noise-sensitive ungulates; contemporary syntheses show that persistent industrial noise reduces habitat use, alters foraging and movement, and has measurable physiological stress effects, with observable improvements when noise is reduced. Blast vibration also presents a risk of cosmetic and structural damage to buildings. We are already seeing cracks in one of our buildings, which we believe is related to this. We have only just become aware that we can raise such issues, as well as concerns about noise pollution/disruption. We are happy to start complaining regularly about this if it is going to be beneficial. If we start reporting every issue, weekly notifications are likely.

We require (at the proponent's cost): (i) independent 24/7 real-time noise monitoring at our residence with public dashboards, (ii) conservative night-time operating limits and curfews for haulage and fixed plant near Pit 8, (iii) a transparent complaints and response protocol with time-bound rectification, (iv) pre- and post-construction dilapidation surveys of all buildings and water tanks, (v) independent blast vibration monitoring at our dwellings and sheds, and (vi) enforceable stop-work triggers tied to exceedances and adverse meteorology.

4) Dust and air quality — animal health, water and maintenance burden

The air-quality assessment appears to lean on recent wetter-than-average periods and does not transparently model drought, heatwaves and bushfire seasons that typify regional risk. Fine particulates (PM_{2.5}) and coarse dust affect animal respiratory health, contaminate roof-water harvesting and increase maintenance burdens. We require an on-farm monitor for PM_{2.5}/PM₁₀ and dust deposition, with automatic alerts and monthly reporting, plus a tank cleaning and filter replacement program during construction, the lifetime of the mining operation and high-dust phases.

5) Visual scarring and social impacts

The extension would expand a conspicuous open-cut scar visible when traveling to and from our property, further degrading landscape character and rural amenity. The visual impact is understated by long-lens photography and distant viewpoints. Cumulative displacement of Wollar residents has already hollowed out community life; further expansion entrenches this harm.

6) Property value loss and compensable harm

International and Australian valuation literature evidences property value diminution near surface mines, with steepest losses at close range. Our property adjoins the affected haul/road corridor and will bear tangible loss of amenity, increased risk and operating constraints on primary production.

Accordingly, we seek the following (minimum, CPI-indexed) compensation and mitigation package, payable immediately and continuing until operations cease and the land is demonstrably restored to pre-impact function:

1. Annual amenity and value loss: not less than 15% of our property's current value (baseline AU\$600,000 → AU\$90,000 per annum), indexed to CPI, reflecting ongoing depreciation, sleep disturbance, and rural lifestyle loss.
2. Noise and vibration mitigation: full acoustic treatment of our dwelling; engineered barriers at the realigned intersection; independent real-time monitoring at our residence; curfews and adverse-weather shutdowns; pre-/post-works dilapidation surveys; vibration monitoring with repair obligations for cracking attributable to blasting.
3. Air quality program: on-farm PM_{2.5}/PM₁₀ and dust-fall monitors; quarterly veterinary checks for the deer herd; tank cleaning, guttering and filtration replacements; vehicle and building cleaning allowances during high-dust events.
4. Road and infrastructure upgrades: full-depth sealing of Mogo Road to the national park; drainage and shoulder improvements; construction traffic management plans with peak-hour and school-bus protections; maintenance funding for five years after commissioning.
5. Operational disruption: per-day payments for access delays, detours and closures; documented travel-time loss compensation; and business interruption payments tied to farm operations.
6. Independent oversight: appointment (and funding) of an independent environmental auditor to verify compliance; publication of raw monitoring data; and a binding dispute-resolution pathway with time-bound remedies and penalties.
7. Community contributions: increased contributions to local facilities (e.g., Wollar Community Hall), mental-health services and recreation to offset social harm and isolation.

7) Procedural fairness and consultation window

We have been afforded a very short window to respond to a proposal which has clearly been years in development. Compressed consultation risks omissions by affected residents and warrants an additional premium in compensation for procedural unfairness. We reserve the right to make further submissions as additional information emerges. We have stated a baseline minimum of requested compensation above, however, we have not

yet had time to seek full legal and environmental advice. Additional financial compensation, via annual CPI-indexed arrangements, could be considered to avoid further investigation and also could be considered in lieu of some of the above additional compensation requests.

8) Conditions required (if the project proceeds)

- No increase in night-time noise at our residence relative to the measured pre-MOD-3 baseline; enforceable curfews when adverse weather predicts noise propagation toward residences.
- Independent, tamper-proof noise, vibration and dust monitoring at our residence with live public dashboards and monthly compliance audits.
- Blast management plans that prioritise charge reduction, timing windows and atmospheric constraints; automatic stop-work triggers on exceedance; and immediate building inspections after any exceedance or damage reports.
- Sealing and ongoing maintenance of Mogo Road to the national park boundary prior to commissioning the realigned road.
- A funded veterinary program for deer health surveillance (respiratory, reproduction and stress indicators) with make-good obligations for measured productivity decline.
- Visual mitigation (landform shaping, progressive rehabilitation and screening vegetation) designed by an independent landscape architect, audited annually.
- A strengthened complaints protocol with acknowledged receipt within 2 hours and action plans within 24 hours, logged publicly.

Given the pattern of expansion, the proximity to remaining residents, the risks to livestock and amenity, and the inadequacy of safeguards to date, the precautionary outcome is to refuse MOD 3. Should approval be contemplated, it must include the above conditions and the full compensation package. We may be willing to withdraw our objections to the project, dependent on the level of compensation proposed. We would be happy to begin immediate discussions regarding compensation and settlement arrangements by being contacted by email.

Yours sincerely,

Property owners, Mogo Road