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ED:A420176

29 July 2015

Department of Planning and Environment
c/o www.planning.nsw.gov.au

Dear Sir/Madam

MOOLARBEN COAL COMPLEX UG1 OPTIMISATION MODIFICATION APPLICATION FOR PROJECT APPROVALS 05 0117 (STAGE 1) AND 08 0135 (STAGE 2)

Reference is made to the exhibition of the above proposal. Council considered a report on the proposal and resolved to make the following submission.

Council generally supports the modification, however, has concerns as to the cumulative impact of the mining proposals in various stages of assessment by the Department in the LGA. Of particular significance to MWRC is the impact of the additional workforce on community and services infrastructure including housing for both the construction and operational phases of the project. The additional workforce will have an impact on the demand for housing, education services, health services and recreational facilities in the LGA.

The Community Infrastructure Assessment (CIA) was undertaken by Coffey Environments Australia Pty Ltd. The CIS does not include any analysis in terms of the impacts for the Stage 2 approval which is yet to commence. For example, this CIA suggests a need for an additional 145 places in primary and secondary education but this would be on top of the demand yet to be felt from the Stage 2 and other applications yet to be assessed.

The following information has been extracted from the Coffey CIA. The construction period associated with the modification is likely to occur during 2016 – 2017 with an average construction workforce of 120 peaking at 250 for two months during 2017. The increase anticipated is 30 employees above that which is currently an approved workforce of 220.

The modification will also impact the operational workforce with an increase in personnel from 440 to 667 (average) with a peak operational workforce of 740 for 12-18 months during 2016 – 2017. The changes in the workforce are expected to result in an additional:

- 530 people in-migrating to the LGA for the remainder of the life of the Moolarben Coal Complex (a 2.4% increase in 2011 population).
- 91 people requiring short term accommodation during the peak construction phase (2017).
- 14 people requiring short term accommodation after the construction phase is complete.

The implication of the combined Stage 2 approval and UG1 OM is demand for housing for an additional 410 employees in the immediate short term.

The analysis and assumptions in the CIA conclude that the project will create demand for an additional 138 dwellings for a period of around 20 years with flow on employment generating demand for a further 74 dwellings. However, this needs to be considered in addition to the demand created by Stage 2 and other mining projects.

Other Mining Projects

The CIA includes the cumulative impacts of other projects in particular Ulan, Wilpinjong and Bylong Coal Projects. In relation to the Bylong Coal Project, the CIA references Hanson Bailey 2014 stating that the operational workforce of 550 would be accommodated entirely at an on-site accommodation facility. This is not the understanding of Council and the CIA in addressing the cumulative impacts should include the operational workforce for Bylong Coal Project in the in-migration figures which will see an increase of at least another 2% in population and associated impacts. For example, using the assumptions in this CIA for Moolarben and applying those to Bylong, the additional demand for school places could be over 600 places collectively in the next 6 years (Moolarben 290, Bylong 290, Wilpinjong 30). Regardless of the accuracy or otherwise of these assumptions, it is critical that the Department of Planning and Environment look at these issues holistically and make decisions for both the community and the economy having regard to the long term implications of the cumulative impacts of multiple and concurrent approvals. The combined and sustained impact of these projects cannot be underestimated and at some point the Department in their assessment of the project should take the opportunity to collate the available data in the assessment process. Similarly, the cumulative impact on health services seems to have been inadequately addressed and better data, more consistent modelling and monitoring is required to address these issues.

The issues for MWRC are ensuring that land and housing is available to accommodate the in-migration of up to 1,617 people in the next two-three years and a further 550 workers for Bylong (plus family up to 825 and a multiplier) from 2020. There is sufficient land zoned in both Mudgee and Gulgong to accommodate this growth without any lag typically associated with the rezoning process and Council has adopted an Urban Release Strategy to manage the release of land as required. However, as has been the issue in the past, delivering the housing may be more problematic and Council will need assistance to ensure that trades are available and deliver housing required. If the capacity is not there and catered for, additional accommodation pressure will result as external builders and tradesmen compete with the construction and operational workforces for short term housing. Further, while the land and hard infrastructure is available, investment in housing and the limited capacity for local developers to carry projects and deliver in a short timeframe is likely to again be problematic and may result in short term housing affordability issues as has been the case in the past and this is a demonstrated direct and real impact.

Council would like to reinforce the need for the assessment to adequately identify and address the cumulative impacts and provide assistance to manage growth and ensure strategies and policies are in place and up to date to enable this to happen.

Should you have any queries in relation to this matter please contact Liz Densley on 6378 2850.

Yours sincerely



BRAD CAM
GENERAL MANAGER