

Caval Ridge Mine Change Request 8 Accommodation Village Condition Changes

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Appendices

Appendix A – Relevant Conditions Stated by the Coordinator-General

Appendix B – Change Request, Accommodation Location and Capacity (Sept 2010), Executive Summary¹

Appendix C – Housing Study

Appendix D – Housing Impact Plan

¹ The complete set of the Change Request (No. 1) and supporting documents can be viewed at <http://www.dsip.qld.gov.au/assessments-and-approvals/caval-ridge-mine-part-of-the-bma-bowen-basin-coal-growth-project.html>

Executive Summary

Background

The Caval Ridge Mine (the Project) is a new coal mine and coal handling and processing facility under construction approximately 15 kilometres south of Moranbah and 160 kilometres south west of Mackay. BM Alliance Coal Operations Pty Ltd (BMA) as manager and agent for the Central Queensland Coal Associates Joint Venturers is the proponent of the Caval Ridge Mine which forms part of BMA's Bowen Basin Coal Growth Project (BBCGP). The BBCGP was declared by the Coordinator-General in 2008 to be a significant project for which an Environmental Impact Statement (EIS) was required under the *State Development and Public Works Organisation Act 1971* (SDPWOA).

Since the finalisation of the Caval Ridge Mine EIS and the Coordinator-General's Report Evaluating the EIS (August 2010), BMA has continued to review Caval Ridge Mine's operational requirements during the detailed design and construction phase of the Project. As a consequence of the continued review and in accordance with provisions of the SDPWOA, BMA is seeking to make changes to various accommodation village conditions set by the Coordinator-General.

Change to Conditions

BMA is seeking changes to accommodation village requirements arising from Part 2 of the Stated Conditions in the Coordinator-General's Change Report dated February 2011 in relation to Change Request 1.

Reasons for Proposed Change

Certain conditions stated to apply to the Buffel Park Accommodation Village during 2011 require that approximately 900 rooms of the approved capacity of the site cannot be used after 4 years. The requirement for the relevant rooms to be temporary was established during 2011 because a required Housing Study was not available at that time. The Housing Study has now been completed and, on the basis of the findings of the Study, BMA is seeking to remove the conditions that require rooms to only be in use on a temporary basis. These conditions result in increased costs, reduced flexibility and reduced potential for operational innovation over the life of the Project. BMA is seeking changes to these conditions so as to alleviate these impacts and to provide greater flexibility for BMA to manage accommodation activities in the most effective and efficient way.

Anticipated Environmental Effects of the Proposed Changes


BMA has assessed the potential impacts of the proposed condition changes and has concluded that the changes will not materially change the assessment undertaken within the Caval Ridge Mine EIS / Supplementary EIS and various previous project change processes (see section 1.2).

Process for Evaluation of Changes

Part 4, Division 3A of the SDPWOA provides the statutory process for the Coordinator-General to evaluate changes to a declared significant project that has been assessed previously. Under those provisions of the SDPWOA, BMA is requesting that the Coordinator-General approve the Project changes as outlined above.

Conclusion and Recommendations

The proposed changes to the accommodation village conditions are warranted on the basis that a Housing Study and Housing Impact Plan required by the Coordinator-General have now been finalised and approved by the Coordinator-General. The changes are designed to enable BMA to complete relevant project implementation activities and to retain flexibility and operational efficiency



whilst not materially affecting any part of the implementation of the Project or various plans (e.g. Housing Impact Plan, Accommodation Village Management Plan, Social Impact Management Plan,) that have been approved since the original conditions were established.

BMA recommends that the Coordinator-General evaluates this Change Request 8 in accordance with the SDPWOA and approves the requested condition changes.

1 Introduction

This is a formal Change Request (referred to as Change Request 8) to the Coordinator-General for consideration of amendments to conditions imposed on the approved Caval Ridge Mine Project. This Change Request is made under Part 4, Division 3A (Section 35C) of the *State Development and Public Works Organisation Act 1971* (SDPWOA). BMA is the proponent for Caval Ridge Mine.

An EIS prepared by BMA for Caval Ridge Mine was released by the Coordinator-General for public and advisory agency comment during July and August, 2009. The Supplementary EIS was prepared to address issues raised during public notification. The Coordinator-General's Report evaluating the EIS and Supplementary EIS was released in August 2010.

The Change Request process is a formal requirement under the SDPWOA, and is a standard process for considering changes to a project or requested changes to project conditions. Project changes are common, as there are often long timeframes between the issue of the Coordinator-General's Report and the completion of a project. Over this period of time a number of factors can influence a project including market changes, technical requirements or project feasibility.

An EIS is an assessment of a project at a particular point in time, and ongoing review of construction and operational requirements means BMA must reconsider some aspects of Caval Ridge Mine from those detailed in the Caval Ridge Mine EIS and SEIS.

BMA requests the Coordinator-General's approval for changes to accommodation village requirements arising from Part 2 of the Stated Conditions in the Coordinator-General's Change Report dated February 2011 in relation to Change Request 1.

Details of the relevant conditions stated by the Coordinator-General are contained in Appendix A of this Change Request.

This Change Request addresses relevant issues raised in the EIS, Supplementary EIS and the Coordinator-General's Report for Caval Ridge Mine plus the previous Project Change processes. As required under Section 35E of the SDPWOA, this Change Request 8 provides the following information for the various proposed condition changes:

- Statutory requirements of the proposed changes;
- Reasons for the proposed changes;
- A description of the proposed changes; and
- Effects of the proposed changes.

This Change Request 8 provides detailed information to allow the Coordinator-General to appropriately evaluate the proposed changes to the conditions stated for the Caval Ridge Mine (in accordance with Section 35E(c)).

A development application in accordance with the requirements of the *Sustainable Planning Act 2009* will be required to be made should the Coordinator-General approve the proposed changes to the relevant conditions. BMA understands that the Coordinator-General is likely to decide that public notification is required as part of the Change Request process under the SDPWOA. Such notification would also address the *Sustainable Planning Act 2009* requirements for notification for an impact assessable development application.

1.1 Project Background

1.1.1 Bowen Basin Coal Growth Project

The Bowen Basin Coal Growth Project (BBCGP) comprises the expansion of BMA's coal mining operations in the northern portion of the Bowen Basin. The BMA BBCGP Initial Advice Statement, provided to the Coordinator-General in June 2008 outlined the growth in metallurgical coal through the proposed Daunia, Caval Ridge and Goonyella Riverside (expansion) Mines.

The BBCGP was declared a significant project under the SDPWOA by the Coordinator-General in 2008 and the Terms of Reference for the EIS allowed for the completion of a number of EISs to address the multiple components of the BBCGP.

The originally proposed four key components of the BBCGP were:

- the new open cut Caval Ridge Mine (which is the subject of this report);
- the new open cut Daunia Mine (for which a Coordinator-General's EIS evaluation report was completed on 26 October 2009);
- a large expansion of the existing Goonyella Riverside Mine; and
- the construction of a new airport in the vicinity of Moranbah with increased capacity.

As a result of the significant project declaration, BMA was required to produce EISs for both the Caval Ridge Mine and the Daunia Mine, as these are the two components of the BBCG Project that have proceeded.

1.1.2 Caval Ridge Mine

Caval Ridge Mine will be a new multi-seam, open cut coal mine in the Bowen Basin. The mine industrial area (MIA) will be approximately 16 kilometres from Moranbah, the site is also dissected by the Peak Downs Highway (Figure 1.1 Caval Ridge Mine Context Plan). The northern most boundary of Caval Ridge Mine is approximately 6 kilometres from the edge of Moranbah. The Caval Ridge Mine site is adjoined by the Peak Downs Highway and is approximately 17 kilometres in length and 4 kilometres in width. The mine is expected to have a working life of 30 years.

The Caval Ridge Mine site is located north of BMA's Peak Downs Mine and covers the northern extent of the BMA Mining Lease (ML1775). A new mining lease (ML70403), immediately to the west of ML1775, will be used for site infrastructure and supporting activities. Caval Ridge Mine is located on both ML1775 and ML70403.

The EIS and Supplementary EIS for Caval Ridge Mine have been assessed and approved by the Coordinator-General under the SDPWOA as part of the BBCGP significant project.

Figure 1.1 Caval Ridge Mine Context Plan



1.2 Previous Change Requests and Subsequent Development Applications

1.2.1 Previous Change Requests

Ongoing review of Caval Ridge Mine's construction and operational requirements by BMA has required the preparation and submission of seven previous Change Requests (Change Request 1, 2, 3, 4, 5, 6 and 7) to the Coordinator-General. The following table provides an overview of the previous Change Requests.

Table 1-1 Change Request Summary

Change Request Number	Description	Status
Change Request 1	Sought changes to the location and capacity of the primary accommodation village for the Caval Ridge Mine's workforce	Approved February 2011
Change Request 2	Sought administrative amendments to conditions relating to the granting of the Caval Ridge Mine Environmental Authority	Approved November 2010
Change Request 3	Sought administrative amendments to conditions relating to the Housing Impact Study	Approved July 2011
Change Request 4	Sought changes to the proposed Operational workforce arrangements.	Approved September 2011
Change Request 5	Sought changes to the Caval Ridge rail alignment between the existing Blair Athol line and the Caval Ridge Mine Train Load Out facility.	Approved April 2012
Change Request 6	Sought various administrative improvements to miscellaneous conditions including those relating to the implementation of the Social Impact Management Plan and stakeholder communication and complaints procedures.	Approved March 2013
Change Request 7	Deletion of condition 10 (g) in relation to Local Buy Program arrangements	Approved March 2013

This request (Change Request 8) is being pursued separately to Change Requests 1, 2, 3, 4, 5, 6 and 7. Under Section 35G of the SDPWOA, the Coordinator-General must decide if Change Request 8 is to undergo public notification. BMA understands that the Coordinator-General is likely to decide that public notification is required to address the *Sustainable Planning Act 2009* requirements for notification for an impact assessable development application.

1.2.2 Approved Accommodation Arrangements Following Previous Change Requests and Development Approvals

The EIS and Supplementary EIS indicated that project workers would primarily be accommodated in an accommodation village contained on the mining leases associated with the Project, although BMA confirmed in the EIS that further analysis was to be completed in relation to the optimum arrangements.

Change Requests 1 and 4 addressed required changes to the accommodation arrangements.

Change Request 1 (copy of the Executive Summary is attached at Appendix B) enabled the location of the primary accommodation village proposed for the Project to be located on Lot 12 on SP151669, a property known as Buffel Park which is adjacent to the Project's mining leases. The specific location of the Buffel Park Accommodation Village is on the south-eastern side of Peak Downs Highway to the south of the Caval Ridge Mine.

As a result of further analysis after the completion of the EIS and the assessment processes associated with Change Requests 1 and 4 and subsequent development approvals (see section 2.3 below), the following key workforce arrangements and conditions are now in place:

- Up to one hundred per cent of the operational workforce for the Caval Ridge Mine will be fly in fly out workers;
- The Buffel Park Accommodation Village is to be the primary facility for use by the workforce, with existing villages being used temporarily by some of the construction workforce;
- The construction of the initial stages of Buffel Park Accommodation Village was completed in March 2013;
- At its peak operating level, Buffel Park Accommodation Village will have up to 1,945 rooms available for use, including temporary (currently approved 4 year life) and permanent rooms (currently approved 30 year life);
- As currently required, 900 rooms of the 1,945 rooms planned at Buffel Park Accommodation Village cannot be occupied after 4 years – that is, 46% of the room capacity must be decommissioned 4 years after the construction of the rooms.

This Change Request 8 is primarily focused on removing the requirement for the 900 above-mentioned rooms to be decommissioned after 4 years.

1.2.3 Development Applications Following on From Change Request 1 Submission and Approval

Following the receipt of the Coordinator-General's approval of Change Request 1, BMA submitted three development applications in relation to Buffel Park Accommodation Village to the Isaac Regional Council for approval.

The applications concerned the Buffel Park Accommodation Village, namely the construction of temporary and permanent accommodation for construction, operational and maintenance workers; and associated operational works.

On 14 April 2011, the Isaac Regional Council refused one of the three applications, saying it conflicted with the Belyando Planning Scheme by locating a residential use in a Rural Zone.

On 6 May 2011, BMA requested the Treasurer and Minister for State Development and Trade to exercise his call-in powers under the *Sustainable Planning Act* 2009 and call the in the three development applications on the grounds of state interest.

On 6 June 2011, following an invitation for public submissions on his use of his call-in powers, the Minister called in the three development applications.

The applications were called in on grounds of state interest. The Minister indicated that the state interest grounds included the expectation that the Caval Ridge Mine, of which the accommodation village is a crucial part, and the associated expansion of the Peak Downs Mine, would contribute about \$500 million a year to the Queensland economy.

On 2 September 2011, the Minister decided to approve all three applications with conditions.

A permissible change application, in accordance with the *Sustainable Planning Act 2009*, was subsequently made by BMA during 2012 to change the lay-out and staging of rooms within the existing approved boundaries of the village. The change in lay-out also had the effect of reducing the maximum capacity of the site to 1,945 rooms. This permissible change application was endorsed by the Isaac Regional Council and then approved by the Minister for State Development, Infrastructure and Planning in October 2012.

BMA is unable to make a permissible change application in relation to the condition changes being sought in Change Request 8 because BMA considers that the proposed changes do not meet the requirements for permissible changes as provided in the *Sustainable Planning Act 2009*. The requirements are set out in sections 367 and 368 of *Sustainable Planning Act 2009*. In addition, the Coordinator-General indicated in 2011 (in Project Change Report 1) that the temporary room restriction was placed on the construction village component of the Buffel Park Accommodation Village because certain information (i.e. analysis to be included in a Housing Study) was not available. The relevant Housing Study has now been completed (at Appendix C) and BMA considers that it is therefore now appropriate for the Coordinator-General to be requested to now reconsider the original request for a wholly permanent village as set out in Change Request 1 (Executive Summary is at Appendix B) and further specified in this Change Request 8.

2 Statutory Approval Requirements

2.1 Environment Protection and Biodiversity Conservation Act 1999

The Commonwealth Minister of Sustainability, Environment, Water, Population and Communities (DSEWPaC) determined on 23 September 2008 that Caval Ridge Mine constituted a controlled action under Section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA), as there is likely to be a significant impact on matters of national environmental significance.

The completed EIS and Supplementary EIS and the Coordinator-General's Report have been referred to the Commonwealth Minister for assessment under the EPBCA. The Commonwealth decision / approval was made in March 2011.

The variation to accommodation village location, scale and capacity that was included in Change Request 1 was accepted by the Department of Sustainability, Environment, Water, Population and Communities in a letter to the Coordinator-General on 28 October 2010.

It has been concluded that the other Project Changes, 2-8, will not impact Matters of National Environmental Significance (MNES).

As no additional MNES will be affected by the proposed changes to that assessed in the EIS and Supplementary EIS and Project Change Request 1, BMA does not need to make any applications to the Commonwealth in relation to Change Request 8.

2.2 State Development and Public Works Organisation Act 1971

On 4 July 2008, the Coordinator-General declared BMA's BBCGP a significant project for which an EIS is required in accordance with Part 4 of SDPWOA.

The ToR for the BMA BBCGP set out a phased process for assessing the environmental impacts of each element of the BMA BBCGP. As discussed earlier, the EIS and Supplementary EIS for Caval Ridge Mine have been completed.

The Coordinator-General's Report on the Caval Ridge Mine EIS was issued on 9 August 2010. A series of seven Project Change Requests have been approved since the completion of the EIS. These Change Requests are outlined in Table 1-1.

2.2.1 Change Process for EIS

The process for making changes to approved significant projects is outlined in Section 35B to 35L of the SDPWOA. The SDPWOA requires written, descriptive documentation of the changes with sufficient supporting information to enable the assessment of the effects on the Project. A change made under the SDPWOA does not require a full assessment of the Project against the Terms of Reference. Under Section 35E, the level of detail presented as part of the Change Request should be sufficient to ensure that the impacts may be properly considered by the Coordinator-General.

2.3 Other Approvals

Following the issue of the Coordinator-General's Report on an EIS (or a Change Request), any necessary approvals under other relevant legislation must be sought. This includes the *Sustainable Planning Act 2009*, *Mineral Resources Act 1989* (MR Act) or Environmental Authorities under the *Environmental Protection Act 1994* (EP Act). In the case of Change Request 8, should the requested changes be approved by the Coordinator-General, BMA will be required to make a development

application to the Isaac Regional Council in accordance with the *Sustainable Planning Act 2009* to enable the rooms previously approved as temporary rooms to have a longer approved timeframe for use by BMA.

The Change Request 8 application and public notification process will replace the information and referral stage (Chapter 6, Part 3 of the *Sustainable Planning Act 2009*) and notification stage (Chapter 6, Part 4 of the *Sustainable Planning Act 2009*) in the development application process.

The arrangements relating to the temporary rooms set out in the development approval currently in place for the site were applied for by BMA and approved by the Minister for State Development, Infrastructure and Planning in a Notice of Decision dated 4 October 2012. The development approval, provided in accordance with the *Sustainable Planning Act 2009*, establishes the currently approved overall room capacity of the village plus the lay-out and staging of rooms within approved boundaries for the site. The maximum capacity was set at 1,945 rooms in the Notice of Decision of 4 October 2012 relating to the development approval for the site.

2.4 Other Matters

2.4.1 Proponent Commitments

There are no additional project commitments as part of this Change Request.

2.5 Next Steps

After lodgement of Change Request 8 with the Coordinator-General, the Coordinator-General will decide if the Change Request is to undergo public notification under Section 35G of the SDPWOA.

Subsequent to the evaluation process determined by the Coordinator-General, a Change Report must be prepared under Section 35I of the SDPWOA. This Change Report will evaluate the proposed changes and the subsequent effects on the Project. BMA understands that the Coordinator-General is likely to decide that public notification is required in order to reflect the process followed in relation to Change Request 1 and to address the *Sustainable Planning Act 2009* requirements for notification for an impact assessable development application.

3 Proposed changes

3.1 Overview

After ongoing review of the operational requirements for the Caval Ridge Mine, BMA is seeking changes to accommodation village conditions that have been stated to apply to the Caval Ridge Mine Project.

BMA is seeking the removal of Part 2 of the Stated Conditions in the Coordinator-General’s Change Report dated February 2011 in relation to Change Request 1 (included at Appendix A). These stated conditions require certain rooms in the Project’s accommodation facility to be decommissioned after 4 years. BMA submits that the decommissioning of accommodation, given the findings of a 2012 Housing Study required by the Coordinator-General, will exacerbate accommodate shortages in the region over time.

BMA is seeking flexibility in terms of the use of the Buffel Park Village, specifically; that the Village be used for the accommodation of workers from BMA mines as well as for contractors associated with operations, construction and maintenance activities at BMA mines.

BMA submits that these changes will provide for greater flexibility over time to accommodate any personnel and contractors visiting the area without causing adverse impacts on the accommodation demand-supply balance. The proposed changes are supported by the Housing Study and Housing Impact Plan recently approved by the Coordinator-General.

Table 3-1 Overview of Proposed Changes

Topic of Relevant Current Conditions	Condition Reference	Summary of Proposed Change	Summary Reasons
Requirement for approximately 46% of the capacity of the Buffel Park Accommodation Village to be only temporary (i.e. to be decommissioned after a 4 year life)	Part 2 of the Stated Conditions in the Coordinator-General’s Change Report dated February 2011 in relation to Change Request 1	<p>Deleting the requirement for some of the accommodation developed as part of the Project to be temporary in nature. These requirements mean that 900² rooms out of a planned capacity of 1,945 rooms will need to be decommissioned.</p> <p>Full flexibility in terms of the future use of the Buffel Park Village, specifically, the Village may be used for the accommodation of workers from BMA operations as well as for contractors associated with operations, construction and maintenance activities at BMA sites.</p>	<p>This change would provide potential for up to an additional 900 permanent rooms to be permanently maintained. The accommodation facility is a potentially valuable asset to BMA with resulting benefits to the region in terms of enhancing overall accommodation capacity.</p> <p>The additional accommodation capacity will provide BMA with greater flexibility over time to accommodate any personnel and contractors visiting the area without causing adverse impacts on the accommodation demand-supply balance</p>

² As at the time of Change Request 1, 1400 rooms were planned in the relevant part of the village, but the overall planned capacity was reduced by 500 rooms in 2012. This revised capacity was addressed in a subsequent development application (permissible change) and was necessary given the constraining approvals that have been provided and the extended timeframes that have been associated with gaining those approvals. As a result, 900 planned rooms are currently required to be decommissioned.

3.2 Description of Proposed Change

3.2.1 Relevant Conditions

Section 35E(a) of the SDPWOA requires the proponent to describe the proposed changes and their effects on the Project. Section 3.2.2 provides further explanation of the proposed condition changes.

The relevant conditions are in Part 2 of Appendix 1 (Stated conditions for *Sustainable Planning Act 2009* approvals) of the Coordinator-General's Change Report on the accommodation village location and capacity – February 2011. Part 2 relates to a development permit for an Material Change of Use for accommodation building (1400 rooms), hotel and shop (for the temporary construction accommodation village associated with the Caval Ridge Mine, in stages). The general condition in Part 2 provides that:

Any approval of the temporary construction village must be limited to a maximum period of four (4) years from commencement of the use. The entity with jurisdiction for this condition is the Isaac Regional Council.

In summary, this Change Request 8 seeks to change some of the Stated Conditions, as identified above, that establish the use rights for the various parts of the Buffel Park Accommodation Village. In particular, BMA is seeking to change the use rights for the component identified as the "construction accommodation village" from temporary to permanent, noting that a 900 room capacity rather than a 1400 room capacity is now being pursued for this component. Change Request 1 of September 2010 sought approval for the establishment of a permanent construction village and a permanent operations village within the Buffel Park Accommodation Village site. The Coordinator-General's decision about Change Request 1 provided that the construction village component could only be used for a four year period. This decision was made on the basis that certain information was not available at the time of the 2010 decision by the Coordinator-General. The relevant information is now available for consideration and, as a result, BMA is now requesting the Coordinator-General to reconsider Change Request 1.

3.2.2 Further Explanation

BMA's original Change Request submission (Change Request 1) to the Coordinator-General of September 2010 (report entitled: "Change Request - Accommodation Location and Capacity" – refer to Appendix B) detailed a proposal for a permanent accommodation village comprising a maximum of 2,500 rooms. Given the difficulties faced by BMA in securing approval for a 2,500 room capacity accommodation village, BMA subsequently scaled down its total planned capacity for the village to 1,945 rooms.

The Change Request of September 2010 indicated a clear intention for the accommodation village with a capacity of up to 2,500 rooms to be retained over the longer term, in order to meet flexible accommodation needs. The Change Request submission of September 2010 also demonstrated that the environmental impacts of the construction and operation of the village were acceptable and/or could be suitably managed.

In section 4.2.1 of Change Request 1, BMA confirmed that it was planning a village with:

*"A maximum of 2,500 permanent accommodation rooms, provided in stages, being; **Construction Village**: 2,000 permanent rooms including ancillary dining, wet mess, recreation and infrastructure provision; and **Operations Village**: 500 permanent rooms including ancillary dining, wet mess, recreation and infrastructure provision."*

In relation to 2,000 of the 2,500 rooms³ initially proposed by BMA to be permanent, the Coordinator-General subsequently determined in the Coordinator-General Change Report of February 2011 (pages 25-26), that:

“There is generally no issue with construction camps being outside the town and near to the project; however, historical precedent has been for such camps to have only a temporary status. Indeed the Belyando Planning Scheme has a requirement for such accommodation uses to be for a “defined period”..... It is acknowledged that BMA provided supplementary material which set out a decommissioning strategy for 600 of the 2000 rooms in the construction/maintenance village within six years of commencement of the construction village leaving a permanent balance of 1400 rooms⁴. Despite this concession, it is the need for such a large scale permanent accommodation facility post the construction of the CRM that is the issue. The explanatory material supplied to justify the 1400 permanent rooms for maintenance activities solely at the CRM for the life of the mine is not sufficiently analytical to support the application for permanent status for the facility..... The BMA change request, in seeking room capacity and permanency well above the CRM project specification, may be interpreted as pre-empting any findings of the OESR demographic research, and the regional recommendations to flow from the Moranbah BMA Community Network supervised housing study and resultant plan, as conditioned in the Coordinator-General’s assessment report for CRM. The Coordinator-General considers that BMA’s request to have a permanent construction/maintenance village of the proposed 1400 room scale post construction to meet the periodic and ongoing maintenance needs solely for the CRM is premature.”

Since the Coordinator General’s decision on Change Request 1 in February 2011, the Housing Study and the resulting Housing Impact Plan that builds upon the findings of the Housing Study have now been completed by BMA. The Coordinator-General approved the Housing Impact Plan (a sub-component of the Social Impact Management Plan) in May 2013. The Coordinator-General also approved the balance of the Social Impact Management Plan in December 2012. The Housing Study and the Housing Impact Plan are included in this Change Request 8 as Appendices C and D.

The key findings of the Housing Study were that:

The housing market in Moranbah is highly inflated and influenced by the resource sectors’ expansion and contraction in employment, which impacts on a number of areas in Moranbah, including:

- *The ability for non-resource industries to secure employees, particularly in the service sector;*
- *People choosing to live further away from their work place;*
- *The ability for local industries to get trades workers given the combination of the high wages in the resource sector and high rental / housing prices in Moranbah;*
- *The inability for community and emergency services to keep pace with demand in some instances; and,*
- *The unfortunate impacts on individuals’ and families’ well-being from housing stress, which can lead to relationship issues, breakdown and general unsocial behaviour.*

Given the above findings, BMA considers that maintaining the existence of the Buffel Park Accommodation Village, and an allowance for BMA to potentially use all of the rooms that are eventually constructed up to a possible total of 1,945 rooms, would make a positive contribution towards resolving the identified

³ The proposed 500 “operations” rooms were discussed in a separate section of the Coordinator-Generals’ change report

⁴ the total currently planned capacity of the village has now been reduced to provide an overall capacity of 1,945 rooms (inclusive of both permanent and temporary rooms) due to configuration changes that have arisen to try and accommodate the approval challenges that have been experienced

accommodation issues over time. This view is supported by the additional accommodation capacity that the Village could continue to provide in an area that tends to experience periods in which there is insufficient accommodation capacity to meet the demand for accommodation.

BMA therefore requests that the Coordinator-General re-examine the Coordinator-General's February 2011 assessment in relation to Change Request 1 while having regard to the 2012 BBCG Housing Study and subsequently approved Housing Impact Plan and this Change Request 8. BMA further requests that following the requested re-examination, the Coordinator-General determine that the permanent nature of all rooms at the Buffel Village Accommodation facility (up to a maximum of 1,945 rooms) can now be supported following the completion of the Housing Study and Housing Impact Plan.

BMA is seeking flexibility in terms of the use of the Buffel Park Accommodation Village, specifically; that the Village be used for the accommodation of workers from BMA mines as well as for contractors associated with operations, construction and maintenance activities at BMA mines.

BMA submits that these changes will provide for greater flexibility over time to accommodate any personnel and contractors visiting the area without causing adverse impacts on the accommodation demand-supply balance. The proposed changes are supported by the Housing Study and Housing Impact Plan recently approved by the by the Coordinator-General.

3.3 Reasons for Proposed Change

The reasons for the proposed condition changes, as required under Section 35E(b) of the SDPWOA, have been outlined in section 3.2 of this Change Request 8.

Change Request 8 is required because the accommodation village conditions imposed on the Caval Ridge Project result in increased costs, reduced flexibility and reduced potential for operational innovation. BMA is seeking changes to these conditions so as to alleviate these impacts and to provide greater flexibility for BMA to manage activities in the most effective and efficient way.

Part 2 of the Stated Conditions in the Coordinator-General's Change Report dated February 2011 in relation to Change Request 1 should be changed because:

- These stated conditions require certain rooms in the Project's accommodation facility to be decommissioned after 4 years;
- The decommissioning of accommodation results in significant costs to BMA, and results in the removal of an asset which has been designed and constructed for an operational life of over 30 years;
- The decommissioning of accommodation, given the findings of a 2012 Housing Study required by the Coordinator-General, is unwarranted and will exacerbate accommodation shortages in the region in the future;
- The additional accommodation capacity that the Village could continue to provide will be useful in an area that tends to experience periods in which there is insufficient accommodation capacity to meet the demand for accommodation;
- The additional accommodation capacity will provide BMA with greater flexibility over time to accommodate personnel and contractors visiting the area without causing adverse impacts on the accommodation demand-supply balance;
- The change will provide for the sustainable use of site infrastructure (e.g. sewage treatment facilities) that has been designed and constructed to cater for at least 2000 people; and

- The ongoing availability of 1,945 rooms at Buffel Park Accommodation Village will remove the potential costs associated with building replacement rooms in the future when, inevitably new accommodation has to be constructed to meet BMA's growing accommodation needs over time.

3.4 Potential effects of the proposed change

In response to Section 35E(c) of the SDPWOA, this section outlines the potential effects of the proposed condition changes on the Project.

3.4.1 Land Resources

There will be no additional land disturbance proposed as result of the proposed change. The proposed changes will not alter any land disturbance related recommendations or conditions identified in the Coordinator-General's Report or those arising from Change Request 1.

3.4.2 Mineral Waste

The Project's Mineral waste includes the overburden/interburden (spoil) removed to expose the coal resources, and coarse and fine rejects from coal processing. This activity is associated with the Project's mining operation. As mineral waste is not relevant to the proposed condition changes there will be no alternations to any recommendations or conditions identified in the Coordinator-General's Report or previous Change Reports. Accordingly this matter does not require assessment as part of this Change Request.

3.4.3 Surface Water Resources

The change has no impact in terms of surface water impacts when compared to those previously identified.

The proposed condition changes will not alter the land disturbance area associated with the Project and will not alter any surface water-related recommendations or conditions identified in the Coordinator-General's Report or previous Change Reports.

3.4.4 Groundwater Resources

The proposed condition changes have no effects in terms of the previously assessed groundwater impacts. The proposed condition changes will not alter the land disturbance area associated with the Project.

As a result, there will be no influence on natural groundwater recharge or regional flow patterns. No additional groundwater monitoring is required to either establish a baseline or within the ongoing groundwater monitoring program.

The proposed changes will not alter any groundwater-related recommendations or conditions identified in the Coordinator-General's Report or previous Change Reports.

3.4.5 Ecology (Terrestrial and Aquatic)

The proposed condition changes have no effects in terms of the previously assessed ecological impacts of the Caval Ridge Mine Project. The proposed condition changes will not alter the land and vegetation disturbance areas associated with the Project.

The proposed condition changes will not alter any recommendations or conditions identified in the Coordinator-General's Report or previous Change Reports. Furthermore, no change to the EPBC Act approval is required.

The changes requested by BMA will not affect the Project's construction or key plans already approved by regulators for implementation such as the Social Impact Management Plan or the Environmental Management Plan required by the *Environment Protection Act 1994*.

3.4.6 Air Quality

The proposed changes will not alter any air quality recommendations or conditions identified in the Coordinator-General's Report, for example, Conditions 16(a)-(f), Schedule 1, Appendix 1 (air quality review); and Recommendations 6(a)-(b), Schedule 5, Appendix 1 (communicating with the community).

3.4.7 Noise and Vibration

The proposed changes will not alter any recommendations or conditions identified in the Coordinator-General's Report, specifically Conditions D1 – D17, Schedule 3, Appendix 1 for the Environmental Authority (monitoring and mitigating noise impacts); Condition 9(c), Schedule 1, Appendix 1 (community complaints register and response system); and Conditions 5–8, Schedule 1, Appendix 1 (BMA's communication obligations).

3.4.8 Waste Management

There will be no alterations to any waste management-related recommendations or conditions identified in the Coordinator-General's Report. Accordingly this matter does not require assessment as part of this Change Request.

3.4.9 Transport and Traffic

There will be no alterations to any transport and traffic-related recommendations or conditions or plans identified in the Coordinator-General's Report or the Change Report relating to Change Request 1. Accordingly this matter does not require assessment as part of this Change Request 8.

3.4.10 Cultural Heritage and Native Title

The EIS and Supplementary EIS considered the potential Indigenous and Non-Indigenous cultural heritage impacts associated with the Project. Assessments of the cultural heritage impacts associated with the proposed rail change are provided in Appendix H (Indigenous Cultural Heritage) and Appendix I (Non-Indigenous Cultural Heritage). Cultural heritage impacts identified in the EIS and SEIS, as well as through Change Request 1, demonstrated there are no cultural heritage values that impede the requested condition changes.

The proposed changes will not alter any recommendations or conditions identified in the Coordinator-General's Report, specifically Recommendation 1, Schedule 4, Appendix A (preparation of a CHMP to address Aboriginal cultural heritage). The CHMP was signed by the BB Claim Group and BMA in June 2010, and is now registered with DNRM's Cultural Heritage Unit.

3.4.11 Social Impacts

The necessary management arrangements are contained within the Social Impact Management Plan and Housing Impact Plan approved by the Coordinator-General in December 2012 and May 2013, respectively.

While this change will reduce administrative burden over the life of the Project, there will be no resulting impacts on the requirements of the approved Housing Impact Plan.

In addition, the changes requested by BMA will not affect the Project's construction or other key plans already approved by regulators for implementation such as the Social Impact Management Plan or the Environmental Management Plan required by the *Environment Protection Act 1994*.

3.4.12 Economic Impacts

The economic impacts of the Project and of the Buffel Park Accommodation Village have been explored and specified in detail in the EIS, Supplementary EIS, Change Requests 1 and 4, the 2012 BBCG Housing Study (required by the Coordinator-General). The proposed changes will have no materially different economic impacts at the National, State or regional level.

However, the ongoing availability of 1,940 rooms at Buffel Park Accommodation Village will remove the potential costs associated with building replacement rooms in the future when, inevitably new accommodation has to be constructed to meet BMA's growing accommodation needs over time. In addition, the Project will be more cost-effective as room decommissioning costs will not need to be incurred for up to 30 years.

3.4.13 Workforce Accommodation Arrangements

The accommodation village conditions stated to apply to the Caval Ridge Mine Project before the finalisation of the 2012 Housing Study required by the Coordinator-General result in increased costs, reduced flexibility and reduced potential for operational innovation. BMA is seeking changes to these conditions so as to alleviate these impacts and to provide greater flexibility for BMA to manage activities in the most effective and efficient way.

BMA submits that the decommissioning of accommodation, given the findings of a 2012 Housing Study required by the Coordinator-General, is unwarranted and will exacerbate accommodation shortages in the region in the future.

The objective of the proposed changes is to resolve some of the above-mentioned issues and the proposed changes are consistent with the workforce accommodation arrangements specified in Change Requests 1 and 4, and the Housing Impact Plan approved by the Coordinator-General. The only changes from the already approved arrangements, as specified in section 1.2.2 (replicated below), are identified below via the strike through text.

"The EIS and Supplementary EIS indicated that project workers would be accommodated in an accommodation village contained on the mining leases associated with the Project, although BMA confirmed in the EIS that further analysis was to be completed in relation to the optimum arrangements.

As a result of further analysis after the completion of the EIS and the assessment processes associated with Change Requests 1 and 4 and subsequent development approvals, the following key workforce arrangements are now being implemented

- *Up to one hundred per cent of the operational workforce for the Caval Ridge Mine will be fly in fly out workers;*
- *The Buffel Park Accommodation Village is to be the primary facility for use by the workforce, with existing villages being used temporarily by some of the construction workforce;*
- *the construction of the initial stages of Buffel Park Accommodation Village was completed in March 2013;*
- *at its peak operating level, Buffel Park Accommodation Village will have up to 1,945 rooms available for use, ~~including temporary and permanent rooms;~~*

- ~~existing approvals require that 900 rooms of the 1,945 rooms at BPAV cannot be occupied after 4 years—that is, 46% of the room capacity must be decommissioned”~~

BMA is seeking flexibility in terms of the use of the Buffel Park Accommodation Village, specifically; that the Village be used for the accommodation of workers from BMA mines as well as for contractors associated with operations, construction and maintenance activities at BMA mines.

BMA submits that these changes will provide for greater flexibility over time to accommodate any personnel and contractors visiting the area without causing adverse impacts on the accommodation demand-supply balance. The proposed changes are supported by the Housing Study and Housing Impact Plan recently approved by the by the Coordinator-General.

3.4.14 Greenhouse Gas Emissions

There will be no alterations to any greenhouse gas-related recommendations or conditions or plans identified in the Coordinator-General’s Report or the Change Report relating to Change Request 1. Accordingly this matter does not require assessment as part of this Change Request 8.

3.5 Summary of Effects and Required Approvals

While providing BMA with greater flexibility and the ability to secure administrative benefits and cost savings, BMA has assessed the potential impacts of the proposed condition changes and has concluded that the changes will not materially change the assessment undertaken within the Caval Ridge Mine EIS / Supplementary EIS and various previous project change processes.

Should the requested changes be approved by the Coordinator-General, BMA will be required to make a development application in accordance with the *Sustainable Planning Act 2009* to enable the rooms previously approved as temporary rooms to have a longer approved timeframe for use by BMA.

4 Conclusion

Following ongoing review, BMA seeks to change accommodation village conditions that have previously been stated to apply to the Project by the Coordinator-General.

The accommodation village conditions set for the Project result in increased costs, reduced flexibility and reduced potential for operational innovation over the life of the Project. BMA is seeking changes to these conditions so as to alleviate these impacts and to provide greater flexibility for BMA to manage activities in the most effective and efficient way.

The proposed changes to the conditions are warranted on the basis that the Housing Study and Housing Impact Plan have now been finalised and approved by the Coordinator-General. The changes are designed to reduce operational constraints on the Caval Ridge Project whilst not materially affecting any part of the implementation of the Project or various plans (e.g. Housing Impact Plan, Accommodation Village Management Plan, Social Impact Management Plan,) that have been approved since the original conditions were imposed.

BMA recommends that the Coordinator-General evaluates this Change Request 8 in accordance with the SDPWOA and approves the requested condition changes for the reasons detailed.

Part 2 of the Stated Conditions in the Coordinator-General's Change Report dated February 2011 in relation to Change Request 1 should be changed because:

- These stated conditions require certain rooms in the Project's accommodation facility to be decommissioned after 4 years;
- The decommission of accommodation results in significant costs to BMA, and results in the removal of an asset which has been designed and constructed for an operational life of at least 30 years;
- The decommissioning of accommodation, given the findings of a 2012 Housing Study required by the Coordinator-General, is unwarranted and will exacerbate accommodation shortages in the region in the future;
- The additional accommodation capacity that the Village could continue to provide will be useful in an area that tends to experience periods in which there is insufficient accommodation capacity to meet the demand for accommodation;
- The additional accommodation capacity, together with full flexibility relating to the use of the Village for the accommodation of workers from BMA mines as well as for contractors associated with operations, construction and maintenance activities, will provide BMA with greater flexibility over time to accommodate personnel and contractors visiting the area without causing adverse impacts on the accommodation demand-supply balance;
- The ongoing availability of 1,945 rooms at Buffel Park Accommodation Village will remove the potential costs associated with building replacement rooms in the future when, inevitably new accommodation has to be constructed to meet BMA's growing accommodation needs over time;
- The change will provide for the sustainable use of site infrastructure (e.g. sewage treatment facilities) that has been designed and constructed to cater for 2,000 people.

Appendix A – Relevant Conditions Stated by the Coordinator-General

Coordinator-General's Report reference	Condition text
<p>Appendix 1 Stated conditions for</p> <p><i>Sustainable Planning Act</i></p> <p>2009 approvals; Part 2 of Appendix 1 of</p> <p>Coordinator-General's Change Report on the accommodation village location and capacity – February 2011</p>	<p>Part 2. Development permit for an MCU for accommodation building (1400 rooms), hotel and shop (for the temporary construction accommodation village associated with the Caval Ridge Mine, in stages)—general condition</p> <p>Any approval of the temporary construction village must be limited to a maximum period of four (4) years from commencement of the use. The entity with jurisdiction for this condition is the Isaac Regional Council.</p>



Appendix B –Change Request - Accommodation Location and Capacity (September 2010) – Executive Summary

Note: The complete set of the Change Request (No. 1) and supporting documents can be viewed at <http://www.dsdip.qld.gov.au/assessments-and-approvals/caval-ridge-mine-part-of-the-bma-bowen-basin-coal-growth-project.html>



Appendix C – Housing Study



Appendix D – Housing Impact Plan