



27 June 2019

Mr Paul Freeman
Team Leader
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Freeman

Re: Clarence Colliery MOD 4 – Response to Submissions

Please find attached a response to the submissions received during the public exhibition period of the Clarence Colliery MOD 4 Statement of Environmental Effects.

Please contact me on my mobile 0407 207 530 if you have any questions or require any further information in regards to this matter.

Yours sincerely

James Wearne
Group Approvals Manager

Attached:

- Attachment 1 - Clarence Colliery MOD 4 Response to Submissions

Attachment 1

Clarence Colliery MOD 4 Response to Submissions

Background

Springvale Mine is experiencing shortfalls in the amount of coal, of the required specification, that it is able to be supplied to the Mount Piper Power Station (MPPS). If the shortfall in coal supply is left unmitigated, on-site stockpiles at MPPS will continue to decline with potential impacts to the efficient operation of MPPS and the supply of electricity to NSW.

To assist in providing a supplementary supply of coal to the MPPS, Centennial Coal is seeking to modify the Clarence Colliery development consent (DA 504-00) to allow for:

- An increase total allowable coal haulage off-site by road from 200,000 tonnes (t) to 300,000 t for a limited period of time up to 31 December 2020; and
- An increase total allowable coal haulage off-site to the west by road from 100,000 t to 200,000 t for a limited period of time up to 31 December 2020.

Centennial Coal is seeking to modify DA 504-00 pursuant to Section 4.55(2) of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). A Statement of Environmental Effects (SEE) was prepared to support the modification application. The SEE was placed on public exhibition from 22 May 2019 through to 20 June 2019.

If approved, the supplementary supply of coal to MPPS will provide indirect social and economic benefits through increased job security for MPPS employees and subsequent benefits to the local and regional economy through income and expenditure and more widely in NSW in assisting to secure the current electricity supply.

Summary of Submissions

Nineteen submissions were received during the public exhibition period of the SEE. Five submissions were received from public authorities being:

- Blue Mountains City Council;
- Environment Protection Authority;
- Lithgow City Council;
- Resources Regulator; and
- Roads and Maritime Services.

Two submissions were received from non-government organisations being:

- Nature Conservation Council; and
- Bathurst Community Climate Action Network.

Twelve submissions were received from community individuals with one submission supporting the project and 11 submissions providing comment on or objecting to the project. Of the 11 submissions providing comment on or objecting to the project, 8 submissions were 'form letters' consistent with the submission from the Nature Conservation Council and Bathurst Community Climate Action Network.

A summary of the issues raised within the submissions received is provided in **Table 1** below.

Table 1 – Summary of Submission Issues

Submission	Summary of Issues
Blue Mountains City Council	Concern regarding increase risk to pedestrian and cycle access routes for children, other residents and visitors travelling to school or accessing the shops and main park in the village.
	Concern regarding the interaction of truck traffic with tourism traffic on the Great Western Highway.
	The proponent should seek to have all haulage contractors partner with the Council on the Drive Neighbourly Agreement and provide their support for the delivery of the “Respect...Our Code on Blue Mountains Roads”.
	Additional funding will need to be provided to maintain the connection between the local and state road networks.
Environment Protection Authority	No comments regarding the modification other than to advise that Condition O3.3 of EPL 726 requires <i>“trucks transporting coal from the premises be covered immediately after loading to prevent wind blown emissions and spillage. The covering must be maintained until immediately before unloading the trucks”</i> .
Lithgow City Council	The Environmental Assessment adequately highlights the relevant issues with Council having no objection to the project.
Resources Regulator	Any disturbance resulting from the activities carried out under the mining lease will need to be rehabilitated to the satisfaction of the Minister.
	The lease holder must apply to the Minister for approval of a Mining Operations Plan (MOP) prepared in accordance with the relevant Resources Regulator guidelines. An approved MOP must be in place prior to commencement of any significant surface disturbing activities, including mining operations, mining purposes and prospecting. The MOP must identify the post mining land use and set out a detailed rehabilitation strategy.
	The lease holder will be required to prepare an Annual Rehabilitation Report to the satisfaction of the Minister. The report must be prepared in accordance with the relevant Resources Regulator guidelines and must provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP.
	The lease holder will be required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all and any kind under the mining lease, including obligations of any kind under the mining lease that may arise in the future.

Submission	Summary of Issues
Roads and Maritime Services	To reflect the commitments outlined by the applicant in the latest Statement of Environmental Effects (SEE), condition 7 is to be modified to read: The Applicant may transport up to 300,000 tonnes of coal by road per calendar year. A maximum of 200,000 tonnes per calendar year may be transported to the west, via the Darling Causeway and Great Western Highway haulage route shown in EA Mod 3, and a maximum of 200,000 tonnes per calendar year transported along the approved haulage route to the east. <i>Note: Whilst maximum tonnage of coal haulage to the east is 200,000 tonnes and to the west is 200,000 tonnes per annum, the maximum tonnage of coal transported on public roads in any direction per year is to not exceed 300,000 tonnes.</i>
	The Applicant shall not cause more than 40 truck movements per day in each direction (80 total), and no more than 8 movements in each direction (16 total) in any hourly period, to or from site.
	Along the haulage route west of Mount Victoria, no more than 25 truck movements per day shall occur in each direction (50 total), and no more than 4 movements in each direction (8 total) during any hourly period.
	The setback of the existing private WPS access gate to the Castlereagh Highway (HW18) limits the available distance for trucks to queue before impacting the highway deceleration lane. The likelihood of truck arrivals at the same time will increase as a result of this proposed modification. Roads and Maritime recommends: The Wallerawang Power Station Haul Road access gate from the Castlereagh Highway (HW18) shall be kept open during the approved hours of haul operations, or shall be relocated a minimum distance of 50m back from the edge of the travel lane on HW18 to provide additional space for trucks to queue if the gate is closed.
Bathurst Community Climate Action Network Nature Conservation Council Community Individual Form Letters	Air pollution is currently not adequately monitored in the Lithgow area. Centennial must pay for the NSW Department of Planning and Environment to install, operate and maintain at least two permanent, National Association of Testing Authorities (NATA)-accredited, continuous air-quality monitoring stations in the Lithgow area. These should become part of the NSW Government's state wide air-quality monitoring network and monitor particles, sulfur dioxide, nitrogen oxides and ozone.
	While the majority of the distance travelled between the colliery and the power station under this proposal will be on sealed public roads, there will still be significant truck movements on unpaved roads at either end of the journey.
	Transportation of coal by road will add to the cumulative air pollution load. The proposed modification will result in an

Submission	Summary of Issues
	additional 30–56 daily movements of heavy diesel trucks through Lithgow. This is on top of the existing 50 truck movements per day associated with a similar modification granted in 2014 which has allowed 100,000 tonnes per year of coal haulage to the west.
	Trucks transporting coal from the premises must be covered immediately after loading to prevent wind-blown emissions and spillage. The covering must be maintained until immediately before unloading the trucks.
	The drop height when loading and unloading the trucks must be less than 1.5 metres.
	The moisture content of the material transported must be at least 2% to minimise dust emissions.
	There must be a truck wheel wash before any truck used to haul coal leaves the mine or the destination to ensure that truck is clean and free of loose material.
	All trucks used to haul coal from the site must be compliant with Euro VI standards for heavy vehicle emissions.
Community Individuals	The roads are not suited to additional heavy truck movements increasing risks of an accident.
	Object due to increased movement of heavy trucks through residential areas.
	The project and associated increase in coal production will result in an increased risk to the environment.
	The project results in an Increasingly unsafe nature of using a bicycle in the Lithgow LGA.

Response to Submissions

A response to the issues raised within submissions received is provided below.

Blue Mountains City Council

Issue: Concern regarding increase risk to pedestrian and cycle access routes for children, other residents and visitors travelling to school or accessing the shops and main park in the village.

Response: A Traffic Impact Assessment was prepared by EMM and provided as Appendix A to the SEE. The Traffic Impact Assessment concluded that the future additional daily truck movements from the proposed modification should have no adverse traffic safety impacts on the roads in which increased coal haulage will occur.

To limit interactions with the public, haulage of coal offsite from Clarence Colliery to the west is restricted to between the hours of 7 am to 10 pm Monday to Saturday and between 8 am to 10 pm on

Sunday and public holidays. Heavy vehicle movements will be managed to ensure there are no more than 8 movements in each direction (16 total) in any hourly period.

To reduce risks to the public, including pedestrians and cyclists, all coal haulage truck operators are required to hold current NSW drivers licences and must obey all road rules and signage. To further reduce risks associated with heavy vehicle movements along the haulage route, Centennial Coal undertakes truck driver training in accordance with the sites Training and Competency Management Plan and enforces strict policies and procedures. All transport companies are required to adhere to the Clarence Colliery Haulage Management Standard which:

- Sets out the guidelines and procedures for the loading and transportation of coal product from Clarence Colliery to the west;
- Outlines the controls in place to minimise the risk from identified hazards;
- Sets out a framework to manage the controls through the assignment of roles and responsibilities; and
- Defines a process to audit, monitor and review to measure performance and correct non conformances with the management standard.

To improve driver awareness of Centennial's expectations for truck drivers when operating on the public road network, a Code of Conduct for coal haulage operators, with input from Blue Mountains City Council, will be developed. The Code of Conduct will focus on good driver behaviour including:

- Keeping appropriate distances between vehicles
- Overtaking with care
- Observing designated speed limits
- Making sufficient allowance for slowing down and stopping
- Exercising caution in reduced visibility conditions
- Considering cyclists and pedestrians
- Convoying

Once developed, Centennial Coal will make all Coal haulage operators aware of the Code of Conduct through the sites induction program. The purpose of the Code of Conduct will be to reinforce appropriate and safe driver behavior and expectations when operating on the public road network and align these expectations with the Blue Mountains City Councils 'Respect...Our Code on Blue Mountains Roads' program.

Centennial will continue to reinforce appropriate driver behavior through the sites induction process and reviews implemented in accordance with the Clarence Colliery Haulage Management Standard.

Issue: *Concern regarding the interaction of truck traffic with tourism traffic on the Great Western Highway.*

Response: A Traffic Impact Assessment was prepared by EMM and provided as Appendix A to the SEE. The Traffic Impact Assessment concluded that the future additional daily truck movements from the proposed modification should have no adverse traffic safety impacts on the roads in which increased coal haulage will occur.

To limit interactions with the public, haulage of coal offsite from Clarence Colliery to the west is restricted to between the hours of 7 am to 10 pm Monday to Saturday and between 8 am to 10 pm on Sunday and public holidays. Heavy vehicle movements will be managed to ensure there are no more than 8 movements in each direction (16 total) in any hourly period.

To improve driver awareness of Centennial's expectations for truck drivers when operating on the public road network, a Code of Conduct for coal haulage operators, with input from Blue Mountains City Council, will be developed. The Code of Conduct will focus on good driver behaviour including:

- Keeping appropriate distances between vehicles
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- Observing designated speed limits
- Making sufficient allowance for slowing down and stopping
- Exercising caution in reduced visibility conditions
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- Convoying

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Issue: *The proponent should seek to have all haulage contractors partner with the Council on the Drive Neighbourly Agreement and provide their support for the delivery of the "Respect...Our Code on Blue Mountains Roads".*

Response: To improve driver awareness of Centennial's expectations for truck drivers when operating on the public road network, a Code of Conduct for coal haulage operators, with input from Blue Mountains City Council, will be developed. The Code of Conduct will focus on good driver behaviour including:

- Keeping appropriate distances between vehicles
- Overtaking with care
- Observing designated speed limits
- Making sufficient allowance for slowing down and stopping
- Exercising caution in reduced visibility conditions
- Considering cyclists and pedestrians
- Convoying

Once developed, Centennial Coal will make all Coal haulage operators aware of the Code of Conduct through the sites induction program. The purpose of the Code of Conduct will be to reinforce appropriate and safe driver behavior and expectations when operating on the public road network and align these expectations with the Blue Mountains City Councils 'Respect...Our Code on Blue Mountains Roads' program.

Centennial will continue to reinforce appropriate driver behavior through the sites induction process and reviews implemented in accordance with the Clarence Colliery Haulage Management Standard.

Issue: *Additional funding will need to be provided to maintain the connection between the local and state road networks.*

Response: The proposed modification is seeking a temporary increase in the total volume of coal that can be transported offsite from the Clarence Colliery by truck and sent west to the MPPS. Specifically, the increase in coal transported offsite and to the west by truck from Clarence Colliery is only sought for the 2019 and 2020 calendar years. The modification is required to provide a short term supplementary coal supply to the power station due to shortfalls in the coal currently being supplied to the MPPS from the Springvale Mine. If approved, the proposed modification will result in a temporary increase in the number of heavy vehicle movements between the Clarence Colliery and the intersection of Station Street and Harley Avenue. The proportional daily traffic increases from the additional daily truck movements on Clarence Colliery Road, Chifley Road, Darling Causeway and Station Street will be approximately 1.4%–8.3% of existing traffic. As this daily traffic volume increases will all be generally less than 10% of the existing daily traffic movements, the daily and peak hourly traffic conditions along these roads will remain effectively unchanged with negligible traffic flow impacts for the local road network.

Due to the temporary nature of the impact and negligible consequences to the safety and efficiency of the road network within the Blue Mountains City Council area, no additional funding for road maintenance is considered warranted.

Environment Protection Authority

Issue: *Condition 03.3 of EPL 726 requires “trucks transporting coal from the premises be covered immediately after loading to prevent wind blown emissions and spillage. The covering must be maintained until immediately before unloading the trucks”.*

Response: Centennial Coal notes the requirements of the Environment Protection Licence (EPL 726). The requirement to cover loads is adhered to and is captured within the Clarence Colliery Haulage Management Standard. In accordance with the Clarence Colliery Haulage Management Standard all trucks transporting coal from the premises will be covered immediately after loading to the point of unloading.

Audits of the Clarence Colliery Haulage Management Standard are undertaken to establish and demonstrate compliance with the requirements of the Standard. Training to all drivers on the Clarence Colliery Haulage Management Standard is provided during the sites induction process.

Lithgow City Council

Issue: *The Environmental Assessment adequately highlights the relevant issues with Council having no objection to the project.*

Response: Noted

Resources Regulator

Issue: *Any disturbance resulting from the activities carried out under the mining lease will need to be rehabilitated to the satisfaction of the Minister.*

Response: No additional disturbance is required to support the activities proposed by this modification.

Issue: *The lease holder must apply to the Minister for approval of a Mining Operations Plan (MOP) prepared in accordance with the relevant Resources Regulator guidelines. An approved MOP must be in place prior to commencement of any significant surface disturbing activities, including mining operations, mining purposes and prospecting. The MOP must identify the post mining land use and set out a detailed rehabilitation strategy.*

Response: Clarence Colliery operates under an approved MOP which covers the period from 1 January 2018 to 31 October 2022. The MOP was approved by the Division of Resources and Geosciences on 12 February 2018. The approved MOP includes details on the post mining land use and rehabilitation strategy for the Clarence Colliery. The key objective of site rehabilitation at Clarence Colliery is to achieve an optimum post-mining land capability suitable for supporting the natural bushland environment which surrounds the site.

Issue: *The lease holder will be required to prepare an Annual Rehabilitation Report to the satisfaction of the Minister. The report must be prepared in accordance with the relevant Resources Regulator guidelines and must provide a detailed review of the progress of rehabilitation against the performance measures and criteria established in the approved MOP.*

Response: Progress of rehabilitation activities are included in the sites Annual Review which is designed to satisfy the requirements of the Annual Rehabilitation Report. Copies of the Annual Review are provided to the Resource Regulator and made available on the Centennial Coal website.

Issue: *The lease holder will be required to provide and maintain a security deposit to secure funding for the fulfilment of obligations of all and any kind under the mining lease, including obligations of any kind under the mining lease that may arise in the future.*

Response: Centennial Coal has lodged a security deposit with the Division of Resources and Geosciences to cover the costs for the Government undertaking rehabilitation of the site should it be required. The security deposit held for Clarence Colliery has been calculated in accordance with the Division of Resources and Geosciences Rehabilitation Cost Estimate Tool. The security deposit is reviewed annually.

Roads and Maritime Services

Issue: *To reflect the commitments outlined by the applicant in the latest Statement of Environmental Effects (SEE), condition 7 is to be modified to read:*

The Applicant may transport up to 300,000 tonnes of coal by road per calendar year. A maximum of 200,000 tonnes per calendar year may be transported to the west, via the Darling Causeway and Great Western Highway haulage route shown in EA Mod 3, and a maximum of 200,000 tonnes per calendar year transported along the approved haulage route to the east.

Note: Whilst maximum tonnage of coal haulage to the east is 200,000 tonnes and to the west is 200,000 tonnes per annum, the maximum tonnage of coal transported on public roads in any direction per year is to not exceed 300,000 tonnes.

Response: Although the proposed wording of condition 7 of the development consent is consistent with the intent of the proposed modification, it should be noted that the increase in coal transportation from site is only requested for the 2019 and 2020 calendar years.

Issue: *The Applicant shall not cause more than 40 truck movements per day in each direction (80 total), and no more than 8 movements in each direction (16 total) in any hourly period, to or from site.*

Response: The proposed restrictions on haul truck movements is consistent with the proposed modification assessments however it should be noted that the increase in daily truck movements is limited to the haulage route between Clarence Colliery and the intersection of Station Street and Harley Avenue. Coal haulage volumes beyond this point remain within previously assessed and approved limits of 25 one way truck movements per day.

Issue: *Along the haulage route west of Mount Victoria, no more than 25 truck movements per day shall occur in each direction (50 total), and no more than 4 movements in each direction (8 total) during any hourly period.*

Response: Although the number of truck movements per day is consistent with the modification application, the number of truck movements should be *no more than 8 movements in each direction (16 total) in any hourly period.*

Issue: *The setback of the existing private WPS access gate to the Castlereagh Highway (HW18) limits the available distance for trucks to queue before impacting the highway deceleration lane. The likelihood of truck arrivals at the same time will increase as a result of this proposed modification. Roads and Maritime recommends:*

The Wallerawang Power Station Haul Road access gate from the Castlereagh Highway (HW18) shall be kept open during the approved hours of haul operations, or shall be relocated a minimum distance of 50m back from the edge of the travel lane on HW18 to provide additional space for trucks to queue if the gate is closed.

Response: Centennial Coal will ensure the Wallerawang Power Station Haul Road access gate from the Castlereagh Highway (HW18) is kept open during the approved hours of haul operations, or shall be relocated a minimum distance of 50m back from the edge of the travel lane to provide additional space for trucks to queue if the gate is closed.

Nature Conservation Council, Bathurst Community Climate Action Network & Community Individual Form Letters

Issue: *Air pollution is currently not adequately monitored in the Lithgow area. Centennial must pay for the NSW Department of Planning and Environment to install, operate and maintain at least two permanent, National Association of Testing Authorities (NATA)-accredited, continuous air-quality monitoring stations in the Lithgow area. These should become part of the NSW Government's state wide air-quality monitoring network and monitor particles, sulfur dioxide, nitrogen oxides and ozone.*

Response: Centennial Coal operates a comprehensive air quality monitoring network across the Western Region surrounding its operations including Clarence Colliery, Lidsdale Siding, Springvale Mine, Angus Place Colliery and Springvale Coal Services. Centennial Coal has adopted a regional approach to the management and monitoring of air emissions which, amongst other benefits, allows management of airshed emissions, rather than focusing on individual operations. The air quality monitoring network operated by Centennial Coal across the Western Region is detailed within the Western Region Air Quality and Greenhouse Gas Management Plan and includes continuous real time air quality monitoring where necessary.

The Western Region Air Quality and Greenhouse Gas Management Plan has been developed in consultation with relevant stakeholders, including the Environment Protection Authority, and approved by the NSW Department of Planning and Environment.

The results from the air quality monitoring network operated by Centennial Coal for each respective operation is summarised in a monthly environmental monitoring data reports prepared in accordance with the requirements of Part 3.5, Section 66(6) of the Protection of the Environment Operations Act 1997 and in the sites Annual Review. Both the monthly Environmental Monitoring Data report and the Annual Review are made available on the Centennial Coal website.

Centennial monitors and manages air emissions to ensure compliance with relevant air quality criteria as details within each operations respective conditions of consent. NATA accredited laboratories are used for analysis of field samples. Contributions by Centennial Coal to additional regional air quality monitoring is not considered necessary.

Issue: *While the majority of the distance travelled between the colliery and the power station under this proposal will be on sealed public roads, there will still be significant truck movements on unpaved roads at either end of the journey.*

Response: All coal haulage transport routes are on sealed roads/hardstand area. In accordance with condition O3.2 of the Clarence Colliery Environment Protection Licence (EPL 726) all trafficable areas, including coal storage areas and vehicle manoeuvring areas, in or on the premises are maintained, at all times, in a condition that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.

Issue: *Transportation of coal by road will add to the cumulative air pollution load. The proposed modification will result in an additional 30–56 daily movements of heavy diesel trucks through Lithgow. This is on top of the existing 50 truck movements per day associated with a similar modification granted in 2014 which has allowed 100,000 tonnes per year of coal haulage to the west.*

Response: As a result of the proposed modification, the increase in daily truck movements is limited to the haulage route between Clarence Colliery and the intersection of Station Street and Harley Avenue. Truck movements along this section of the haulage route will increase from 25 to 40 one way truck movements per day. Coal haulage volumes beyond this point remain within previously assessed and approved limits of 25 one way truck movements per day (50 total). The 2014 modification assessed and approved up to 100,000 t of coal transport to the west, however this was achieved using 25 one way truck movements per day for an average of 125 days per year. As a result of the proposed modification, to achieve the increase in coal haulage to the west, the number of days per year the coal haulage to the west will occur will increase to up to 250.

Issue: *Trucks transporting coal from the premises must be covered immediately after loading to prevent wind-blown emissions and spillage. The covering must be maintained until immediately before unloading the trucks.*

Response: All coal haulage trucks leaving site are immediately covered after loading to prevent wind blown emissions and spillage. The covering is maintained until immediately before unloading the trucks. This is consistent with the requirements of Condition O3.3 of the Clarence Colliery Environment Protection Licence (EPL 726) and as is detailed within the Clarence Colliery Haulage Management Standard.

Issue: *The drop height when loading and unloading the trucks must be less than 1.5 metres.*

Response: All coal haulage trucks are loaded using Front End Loaders which limits the drop height as far as practicable. Clarence Colliery implements a range of onsite dust mitigation measures in accordance with the approved Western Region Air Quality and Greenhouse Gas Management Plan. Air quality impacts from the sites operations will continue to be monitored in accordance with the approved air quality monitoring program detailed within the Western Region Air Quality and Greenhouse Gas Management Plan.

Issue: *The moisture content of the material transported must be at least 2% to minimise dust emissions.*

Response: Dust mitigation of coal during coal transport is managed through covered loads. Additionally, trucks are maintained and cleaned to ensure no loose material is transported off site and all trucks pass through a truck wheel wash prior to leaving site.

Issue: *There must be a truck wheel wash before any truck used to haul coal leaves the mine or the destination to ensure that truck is clean and free of loose material.*

Response: Clarence Colliery has a truck wheel wash installed on site. Prior to leaving the Clarence Colliery, all haulage trucks pass through the truck wheel wash to ensure they are in a clean state prior to accessing the public road network (i.e. sides, undercarriage, draw bars, etc.).

Issue: *All trucks used to haul coal from the site must be compliant with Euro VI standards for heavy vehicle emissions.*

Response: Haulage of coal offsite is undertaken by private haulage contractors. As such, Centennial has limited control over the emission standards of the coal haulage trucks utilised. Regardless, all haulage trucks must be registered and must be roadworthy, comprehensively insured and registered in full compliance with all relevant authorities.

Community Individuals

Issue: *The roads are not suited to additional heavy truck movements increasing risks of an accident.*

Response: The increase in heavy vehicle movements above what was previously assessed and approved is for a short period of time only (2019 and 2020 calendar years) to provide a supplementary coal supply to the MPPS as a result of shortfalls in coal supply from Centennial's Springvale Mine. The proposed modification will utilise existing approval coal haulage routes and will only result in an increase in maximum daily heavy vehicle movements between Clarence Colliery and the intersection of Station Street and Harley Avenue via Darling Causeway.

A Traffic Impact Assessment was prepared by EMM and provided as Appendix A to the SEE. The Traffic Impact Assessment concluded that the future additional daily truck movements from the proposed modification should have no adverse traffic safety impacts on the roads in which increased coal haulage will occur.

To reduce risks to the public, including pedestrians and cyclists, all coal haulage truck operators are required to hold current NSW drivers licences and must obey all road rules and signage. To further reduce risks associated with heavy vehicle movements along the haulage route, Centennial Coal undertakes truck driver training in accordance with the sites Training and Competency Management Plan and enforces strict policies and procedures. All transport companies are required to adhere to the Clarence Colliery Haulage Management Standard which:

- Sets out the guidelines and procedures for the loading and transportation of coal product from Clarence Colliery to the west;
- Outlines the controls in place to minimise the risk from identified hazards;
- Sets out a framework to manage the controls through the assignment of roles and responsibilities; and
- Defines a process to audit, monitor and review to measure performance and correct non conformances with the management standard.

To improve driver awareness of Centennial's expectations for truck drivers when operating on the public road network, a Code of Conduct for coal haulage operators, with input from Blue Mountains City Council will be developed. The Code of Conduct will focus on good driver behaviour including:

- Keeping appropriate distances between vehicles
- Overtaking with care
- Observing designated speed limits
- Making sufficient allowance for slowing down and stopping
- Exercising caution in reduced visibility conditions
- Considering cyclists and pedestrians
- Convoying

Once developed, Centennial Coal will make all Coal haulage operators aware of the Code of Conduct through the sites induction program. The purpose of the Code of Conduct will be to reinforce appropriate and safe driver behavior and expectations when operating on the public road network.

Centennial will continue to reinforce appropriate driver behavior through the sites induction process and reviews implemented in accordance with the Clarence Colliery Haulage Management Standard.

Issue: *Object due to increased movement of heavy trucks through residential areas.*

Response: The increase in heavy vehicle movements above what was previously assessed and approved is for a short period of time only (2019 and 2020 calendar years) to provide a supplementary coal supply to the MPPS as a result of shortfalls in coal supply from Centennial's Springvale Mine. The proposed modification will utilise existing approved that were designed to minimise impacts to surrounding residential communities as far as practical. The impacts of increased heavy vehicle movements are limited to the haul route between Clarence Colliery and the intersection of Station Street and Harley Avenue via Darling Causeway. A Road Traffic Noise Assessment prepared by EMM as part of the SEE determined that the proposed modification will result in an imperceptible increase in traffic noise level along affected roads and, in accordance with the Road Noise Policy, is unlikely to impact residences.

Issue: *The project and associated increase in coal production will result in an increased risk to the environment.*

Response: The proposed modification will not result in any additional surface disturbance activities, will not require any additional infrastructure to be constructed and operated and will not result in any increase in coal production from the Clarence Colliery. The impacts of the modification are limited to an increase in heavy vehicle movements between Clarence Colliery and the intersection of Station Street and Harley Avenue via Darling Causeway.

The SEE prepared to support the modification application concluded that the proposed modification will have minimal environmental impacts. These impacts are temporary in nature as the increase in heavy vehicle movements are being sought for the 2019 and 2020 calendar years only in order to provide a supplementary coal supply to the MPPS.

Issue: *The project results in an increasingly unsafe nature of using a bicycle in the Lithgow LGA.*

Response: As part of the proposed modification, the daily truck movements between the intersection of Station Street and Harley Avenue, in Mount Victoria, and the Wallerawang Power Station Haul Road (i.e. haulage to the west along the Great Western and Castlereagh highway) will remain within the previously assessed and approved limits (i.e. 25 trucks per day or 50 truck movements).

The Great Western Highway and Castlereagh Highway, are high standard arterial roads, which either has multiple traffic lanes in each direction, or where there is only a single traffic lane in each direction, the road has wide sealed shoulders.

To reduce risks to the public, including pedestrians and cyclists, all coal haulage truck operators are required to hold current NSW drivers licences and must obey all road rules and signage. To further reduce risks associated with heavy vehicle movements along the haulage route, Centennial Coal undertakes truck driver training in accordance with the sites Training and Competency Management Plan and enforces strict policies and procedures. All transport companies are required to adhere to the Clarence Colliery Haulage Management Standard which:

- Sets out the guidelines and procedures for the loading and transportation of coal product from Clarence Colliery to the west;
- Outlines the controls in place to minimise the risk from identified hazards;
- Sets out a framework to manage the controls through the assignment of roles and responsibilities; and
- Defines a process to audit, monitor and review to measure performance and correct non conformances with the management standard.

To improve driver awareness of Centennial's expectations for truck drivers when operating on the public road network, a Code of Conduct for coal haulage operators, with input from Blue Mountains City Council will be developed. The Code of Conduct will focus on good driver behaviour including:

- Keeping appropriate distances between vehicles
- Overtaking with care
- Observing designated speed limits
- Making sufficient allowance for slowing down and stopping
- Exercising caution in reduced visibility conditions
- Considering cyclists and pedestrians
- Convoying

Once developed, Centennial Coal will make all Coal haulage operators aware of the Code of Conduct through the sites induction program. The purpose of the Code of Conduct will be to reinforce appropriate and safe driver behavior and expectations when operating on the public road network.

Centennial will continue to reinforce appropriate driver behavior through the sites induction process and reviews implemented in accordance with the Clarence Colliery Haulage Management Standard.

Conclusion

The proposed modification to increase coal volumes transported offsite from the Clarence Colliery and to the west is necessary to provide a supplementary coal supply to the MPPS as a result of shortfalls in coal being supplied by Centennial's Springvale Mine. If the shortfall in coal supply is left unmitigated, on-site stockpiles at MPPS will continue to decline with potential impacts to the efficient operation of MPPS and the supply of electricity to NSW.

No other mines have approval to transport coal by road direct to MPPS and MPPS does not currently have a rail unloading facility. A temporary increase (up to 31 December 2020) of coal supplied from the Clarence Colliery is considered the most suitable short term solution. The temporary increase (up to 31 December 2020) will allow time to apply for the necessary approvals and/or install the infrastructure required to provide an alternative source of coal (for example from another mine) or an alternative transport method (rail).

The SEE prepared to support the modification application concluded that the proposed modification will have minimal environmental impacts. Issues raised in submissions are considered to be adequately managed through Centennial Coal's existing environmental management systems and monitoring networks. As is currently implemented, all haul trucks will be covered immediately after loading and immediately prior to unloading and will pass through a truck wheel wash at the Clarence Colliery before leaving site to minimise dust emissions.

Centennial will continue to inform haulage operators of, and enforce the implementation of, the Clarence Colliery Haulage Management Standard. In addition, to improve driver awareness of Centennial's expectations for truck drivers when operating on the public road network, a Code of Conduct for coal haulage operators, with input from Blue Mountains City Council will be developed. The Code of Conduct will focus on good driver behaviour including:

- Keeping appropriate distances between vehicles
- Overtaking with care
- Observing designated speed limits
- Making sufficient allowance for slowing down and stopping
- Exercising caution in reduced visibility conditions
- Considering cyclists and pedestrians
- Convoying

Once developed, Centennial Coal will make all Coal haulage operators aware of the Code of Conduct through the sites induction program. The purpose of the Code of Conduct will be to reinforce appropriate and safe driver behavior and expectations when operating on the public road network.

To limit interactions with the public, haulage of coal offsite from Clarence Colliery to the west will continue to be restricted to between the hours of 7 am to 10 pm Monday to Saturday and between 8 am to 10 pm on Sunday and public holidays. Additionally, Centennial Coal will ensure no more than 8 movements in each direction (16 total) in any hourly period, to or from site occur as a result of the modification should it be approved.

To minimise the potential risk of trucks queuing at the Wallerawang haul road intersection with the Castlereagh Highway, the gate at the Wallerawang haul road intersection will be kept open during the approved hours of haul operations, or shall be relocated a minimum distance of 50m back from the edge of the travel lane to provide additional space for trucks to queue if the gate is closed.

The proposed modification is in the public interest as it will help to maintain current operations at MPPS and, with the exception of additional truck movements, it can be carried out without any additional plant, equipment or supporting infrastructure. The proposed modification will also enable

continued efficient operations at MPPS. The supplementary supply of coal to MPPS will provide indirect social and economic benefits through increased job security for MPPS employees and subsequent benefits to the local and regional economy through income and expenditure and more widely in NSW in assisting to secure the current electricity supply.