

14 June 2022

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**SSI-33143123, ENVIRONMENTAL IMPACT STUDY (EIS) – PUBLIC AGENCY CONSULTATION  
DENDROBIUM MINE EXTENSION PROJECT, CORDEAUX ROAD, MOUNT KEMBLA**

Transport for NSW (TfNSW) refers to the notification received on 3 May 2022 for the request for input into the EIS for the abovementioned State Significant Infrastructure (SSI).

TfNSW has completed a review of the information provided, including the Road Transport Assessment (prepared by The Transport Planning Partnership dated 23 March 2022) and focusing on the impact to the State Road network.

TfNSW notes:

- The key state classified road is Picton Road.
- The proposed arrangements shown in Attachment 1.
- The development would generate additional traffic. The impact of this traffic needs to be considered and adequately mitigated.
- A separate letter of response will be provided by the TfNSW Corridor and Network Protection team in relation to the rail corridor matters within the Maldon – Dombarton Railway Corridor.

The proposal does not provide enough information to assess the EIS. TfNSW requires the matters outlined in Attachment 2 to be addressed.

Should you require further information please contact Timothy Mahoney, Development Case Officer on (02) 9549 9966 or by emailing [development.south@transport.nsw.gov.au](mailto:development.south@transport.nsw.gov.au).

Yours sincerely

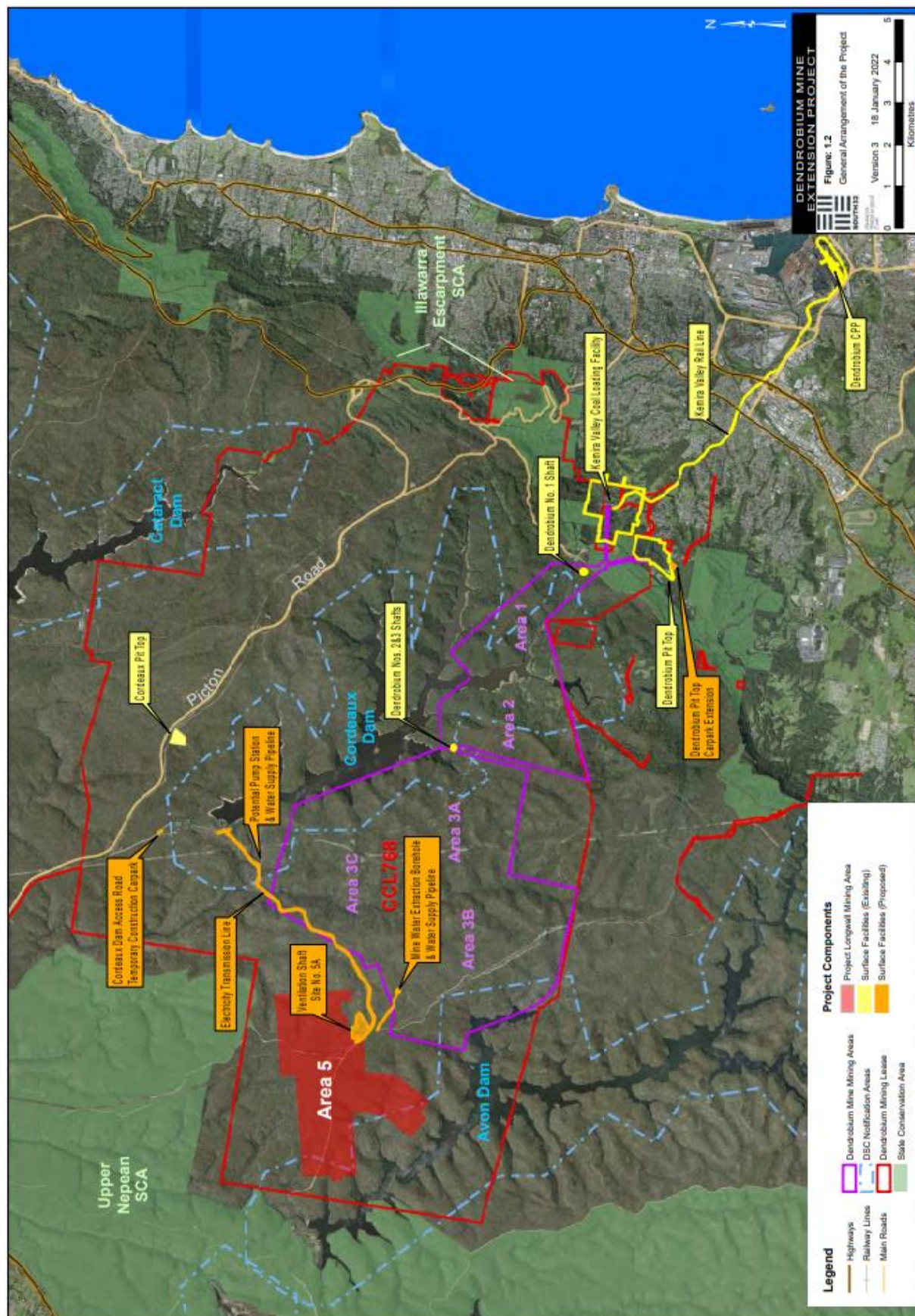


**Timothy Mahoney**

Development Case Officer, Development Services

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TfNSW provides the following comments to be addressed as part of its assessment of the EIS:

## **1. Additional Coal Wash**

The EIS (Section 4) prepared for the project highlights that “approximately 5.2 Mt of additional coal wash would be produced from the processing of coal from the Project” and that the project includes “road transportation of up to 1 Mtpa of coal wash material from the Dendrobium CPP (located within Port Kembla Coal Terminal) to customers for beneficial use, including in the Wollongong, Shellharbour, Macarthur, Southern Tablelands and Nowra regions”. It is also noted that any excess coal wash would be transported to the West Cliff Coal Wash Emplacement Area (off Appin Road) via backloaded truck.

There is no further detail in relation to heavy vehicle traffic generation associated with coal wash management as the Road Transport Assessment (Appendix H) report states that “The Project does not propose any changes to the operational activities at the Dendrobium CPP, Ongoing conditions would be consistent with existing operations with no additional traffic anticipated, so these sites are not considered further in this assessment”.

Whilst haulage routes are not identified in the Road Transport Assessment, it is noted that the transport of an additional 5.2Mt of coal wash could generate significant additional freight movements on the State Road network, whether being delivered to customers for beneficial use or for emplacement. TfNSW notes that the use of the State Road network i.e. B65 Five Islands Road/ Springhill Road and Route M1 Princes Highway would appear to be unavoidable. In reviewing existing approvals for the Dendrobium Mine, Bulli Seam Operations project and the Appin Mine, it appears there are no existing limits in place in relation to coal wash haulage. TfNSW therefore requires additional information in relation to proposed coal wash haulage routes and associated truck volumes and network impacts.

Similarly, the Road Transport Assessment highlights that “a number of oversize or overmass (OSOM) vehicle movements may be generated on an occasional basis during the life of the Project, consistent with the current Dendrobium Mine operations”. OSOM movements introduce specific challenges for the freight network. Details of the anticipated volume of OSOM movements and the associated access arrangements required to support the proposal are requested to highlight the operational freight needs of the project.

## **2. Picton Road and Cordeaux Dam Access Road Intersection**

The Road Transport Assessment (Appendix H, Section 6.2.2) states “The existing layout of the intersection of Picton Road with the Cordeaux Dam access road allows a vehicle turning right out of the Cordeaux Dam access road to conduct a staged turn. A right-turning vehicle can select a gap and cross the westbound traffic lane, then shelter in the wide median area before selecting a gap to enter the eastbound travel lane”. A desktop review has found that a staged turn cannot be undertaken at this intersection. Any vehicles seeking to turn right would be required to wait for a gap in traffic travelling both eastbound and westbound along Picton Road.

The assessment of Picton Road and future forecast is based on the TfNSW AADT Volume Viewer (permanent classifier 06179) for the first half of 2021, as opposed to the 2017 survey referenced in the provided report. Upon review, the traffic volume data referenced in the Road Transport Assessment (Section 6.1.2) is significantly lower than given by the AADT Volume Viewer. In the morning peak eastbound total vehicles are 701 from the AADT Volume Viewer whereas a figure of 358 is reported. This contradicts the report itself in Section 4.3 which states “during the morning peak hour, the traffic is reasonably evenly split between



eastbound (48.5%) and westbound (51.5%)'. TfNSW has found it is 35.4% eastbound and 64.5% westbound.

SIDRA modelling undertaken by TfNSW using data from the same AADT (Station 06179) has shown that the proposed right turn out from Cordeaux Dam access road onto Picton Road would operate at Level of Service (LOS) F. Any additional traffic utilising this intersection would contribute to further unacceptable impacts on the operation and traffic flow of this section of Picton Road.

The Road Transport Assessment calculates a 2.5% annual growth rate based on data from the AADT Volume Viewer (2017-2021). TfNSW believes that due to changes in land use at the Wilton and Macarthur growth areas, the forecast growth would realistically be closer to 4-5% overall and 5-8% along Picton Road. TfNSW additionally suggests that the traffic data as extracted from Station 06179 from 2021 is not an accurate reflection of traffic volumes due to COVID restrictions in NSW in 2021.

Additional information is required in order to address the above discrepancies and determine the suitability of the intersection of Picton Road and Cordeaux Dam access road for the proposed traffic related to the project. The traffic data used is to be reviewed and resubmitted ensuring it is consistent with the AADT Volume Viewer. The response must also demonstrate and justify that the above intersection can facilitate a right turn from and onto Picton Road by providing updated SIDRA modelling, including electronic copies and justification of the inputs and assumptions used. TfNSW additionally notes that internal comments have advised allowing right turns onto Picton Road across large volumes of opposing traffic raises significant safety concerns.