



Transport
for NSW

Director, Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Clay Preshaw

**State Significant Development
Wallahah 2 Coal Project (SSD 4974)
Exhibition of Environmental Impact Statement**

Dear Mr Preshaw

I refer to a letter from Hansen Bailey Environmental Consultants dated 22 April 2013 regarding a request for Transport for NSW to forward comments to you regarding the Exhibition of the Environmental Impact Statement for the Wallarah 2 Coal Project (SSD 4974).

The Environmental Impact Statement does not satisfactorily address all of the Director General's Requirements under the key issues for Traffic and Transport. It is requested that the proponent address the issues raised in the detailed submission contained in **Attachment 1**.

Please note that the Roads and Maritime Services and RailCorp will be submitting separate State's cluster responses for the subject proposal.

Should you have any questions regarding this matter, please contact Mark Ozinga, Manager Land Use & Transport Planning on 8202 2198 or Mark.Ozinga@transport.nsw.gov.au.

Yours sincerely

Carolyn McNally
**Deputy Director General
Planning and Programs**

1-7-13

CD13/07632

ATTACHMENT 1

**TRANSPORT FOR NSW TRANSPORT CLUSTER COMMENTS
EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT
WALLARAH 2 COAL PROJECT (SSD 4974)**

Executive Summary

The EIS does not appear to address and close out all aspects raised in the Director General Requirements particularly with regard to rail network impacts, and other matters including social and economic assessment.

Traffic and Transport Impact Assessment – Appendix Q

The Traffic and Transport Impact Assessment – Appendix Q of the EIS does not appear to address all aspects required in the Director General Requirements, specifically:

- A large number of intersection scenarios have been modelled but only partial results are reported. Results presented for Level of Service (LoS) and Degree of Saturation (DoS) are generally for the worst performing leg, however the worst performing leg is not identified. Full intersection summary results should be provided.
- It should be confirmed with Roads and Maritime Services (RMS) that the proposed future intersection layout for F3/Sparks Rd is acceptable. The adequacy of other proposed intersection treatments should also be confirmed by RMS.
- The Tooheys Road site access is located immediately to the west of one of the balloon loop bridges. In the absence of any further detail regarding the geometry of this intersection it appears that a potential safety issue is Safe Intersection Sight Distances given that the proximity of the bridge and abutments could impede sight distance. What vertical clearance is proposed? Will any high vehicle access be required during operation? It is not clear if the F3 underpass is sufficient in this regard. Detail design should address all these issues to the satisfaction of RMS.
- Clarification is sought with regard to subsidence. How many bridges are located in the vicinity of the extraction area? It is not clear if the bridges within the vicinity of the extraction area are included in the subsidence analysis, and if so, what was the outcome of the analysis?
- There does not appear to be any cross reference to zone of mine influence up to the F3 and any potential settlement on the F3 and possible impact to private and freight vehicles using the motorway.
- There does not appear to be any reference to Wyong Council's proposal for an airport in this location.

While not specifically required by the DGR's but given the type of proposed development it would be expected that some oversized loads will need to be moved to site either during construction or production. While a separate RMS protocol exists for the approval to move oversized loads the identification of a suitable route or any major constraints to such movement could be identified at this stage.

Rail Study – Appendix R

The Rail Study – Appendix R of the EIS does not appear to address all aspects required in the Director General Requirements, specifically:

- Coal Handling / Loading. Only a general arrangement of the rail loop and coal handling infrastructure is shown. Director General Requirements require detailed description and plans of any proposed building works.
- It is unclear from the Rail System Capacity Assessment discussion what the demand year is. The RailSys graphs have Wallarah 2 paths superimposed on North Sydney Freight Corridor Stage 1 paths, so presumably this is out to 2028. Mine life is expected to be until 2041. The proponent should clarify this.

- The Rail Study provides details on train paths and freight interface as modelled by RailCorp however there is little discussion on passenger network strategic objectives and impacts to availability of freight paths.
- Does not appear to contain any analysis or description of the measures that would be implemented to maintain and/or improve the capacity, efficiency and safety of the road and rail network in the surrounding area for the life of the project. That is a minimum period of 28 years and potentially 40 years.
- There is little discussion regarding wider Transport for NSW interface with the broader rail network. Discussion regarding potential impact on/to proposed New Warnervale Station North, Warnervale new town and possibly Warnervale Stabling as well as any future quadruplication of the Short North. An emerging interface may also exist with Bushels Ridge Aboriginal lands claim.

The Rail Study – Appendix R of the EIS appears to contain some contradictory information, specifically:

- Rail Study, the second paragraph on page 2 states that analysis of the “Project rail systems impact will be included in the Environmental Impact Statement” – but this analysis does not appear to have been included.
- Page 4: Mine Operation: “There will be no coal handling and preparation plant....”. This is inconsistent with the project description provided in the Introduction. The Introduction mentions “The mine will produce a single thermal coal product to be marketed for export and domestic electricity generation.” While the domestic scenario is unlikely and excluded from analysis, if it were to eventuate how would coal be transported to either Vales Point or Eraring given that the existing turnouts face the wrong way? Would trains travel the Teralba “detour” through Newcastle, require new south facing turnouts, or does road hauling become an option? Again, while unlikely, the scenario is not discussed in either road or rail appendices. While a full analysis is probably not required a most likely method of transport should be identified.

Economic Assessment

The provided documentation does not address the implications of this project as required in the Director General Requirements on the broader rail network or incorporate any assessment of costs. The analysis should include an apportionment of both capital and recurrent costs e.g. Awaba North loops project, upgrade to 30t axle load, increase in maintenance and asset renewal costs.