

17 July 2020

WST13/00010/05

Ms Rose-Anne Hawkeswood  
Department of Planning Industry & Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Ms Hawkeswood,

**SSD-5765: various lots; Maloneys Road, Lue; Bowden's Silver Mine**

Thank you for referring SSD-5765 to Transport for NSW (TfNSW) for comment. TfNSW encompasses both road and rail infrastructure and as such this response provides comments on both.

I note the application has been referred to TfNSW pursuant to clause 16 of *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2017* (Mining SEPP) and clauses 86 and 104 of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). Works on classified roads will require concurrence from TfNSW pursuant to Section 138(2) of the *Roads Act 1993*.

TfNSW understands the application is for:

- A new open cut silver mine with an operational life of 15 years to produce up to 30,000 tonnes annually of mineral concentrates.
- Transportation of concentrates off site by road, including a number of State and Regional classified roads.
- Closure and realignment of part of Maloney's Road, including a new railway bridge crossing and new crossing of Lawsons Creek.
- Construction of a water supply pipeline from the mine site to the existing Moolarben and Ulan Coal Mines to be constructed on privately owned land and within formed and unformed road reserves. The pipeline corridor will impact two Regional Classified Roads being Ulan Road (MR 214) and Wollar Road (MR208).

TfNSW has reviewed the documentation submitted with the application and provides the following advice.

**1. Traffic Generation Assumptions**

- (a) The proponent proposes to load 44 tonnes of mineral concentrate into two containers and transport using B-double vehicles. This equates to 44 tonnes of mineral concentrate per B-Double, not including the container weight. Payload of B-Double (loaded product + container weight) will vary depending on make and models, however, it will generally range between 38 and 42 tonnes. The proposed total weight combined would exceed B-Double permissible weight on road network. Note that Lue Road allows up to 25/26m B-Double at GML (62.5

tonnes) and that the 25/26m B-Double HML network starts at the Castlereagh Hwy at Mudgee (68 tonnes).

- (b) This may result in traffic volume being underestimated in the TIA and may have an impact on proposed intersection treatments/modelling and road network traffic impact modelling. This needs to be reconsidered given the road limitations.
- (c) Construction haulage traffic calculations has also used assumed a capacity of 50 tonnes per B-Double. This again may result in traffic volume being underestimated and needs to be reconsidered given the road limitations.
- (d) The assessment of impacts includes assumptions of a reduction in background traffic levels due to other mining projects reducing traffic generation. Concern is raised as regarding this reduction in future background traffic levels. This is not considered to be a conservative approach to assessment which could result in adverse impacts on the functioning and safety of the local road network as a result of the development. It is therefore recommended that the assessment be revised to omit the reduction in background traffic associated with projects outside of the control of the proponent.

## **2. Heavy Vehicle Routes**

- (e) The proponent is to explore a suitable B-Double route from the mine site to Parkes. The current proposed route includes Renshaw McGirr Way which does not allow B-Double to travel on the entire length. B-Double access stops near Suntop Solar Farm, west of Wellington.

## **3. Blasting & Vibration**

The EIS indicates that blasting would be a key component of the SSD to achieve the fragmentation of the ore to be processed and waste rock to be used to construct a range of on-site infrastructure. Further information is to be provided regarding the details and locations of each blasting operation and an assessment of vibration associated with each blasting operation in terms of impact on the rail corridor for review and approval in accordance with John Holland Rail (JHR)'s *Blasting Guideline*, (copy enclosed).

## **4. Rail Overbridge**

- (a) The EIS includes a proposal to access the rail corridor to construct a new overbridge for the relocated Maloneys Road and all necessary approvals from the managing agent of the CRN on behalf of TfNSW. Our records indicate that JHR, on 16 April 2019, provided Bowden's Silver Pty Ltd a letter approving, in principle, the overbridge, subject to conditions. However, the letter purporting to approve in principle appears to have already expired, as a result of which, it appears invalid to evidence approval in principle. Accordingly, it is advised that the proponent needs to contact JHR to discuss JHR's letter dated 16 April 2019 and provide evidence of JHR's in principle support of the proposal.
- (b) The EIS includes a statement that the new railway crossing would involve the design and construction of a bridge in accordance with the Australian Standard, AS 5100:2017 (Bridge Design) and the CRN construction standard and that the bridge would be a dual lane concrete structure constructed with pre-cast concrete piles, headstocks, deck planks and retaining walls together with appropriate approach earthworks and completed with steel guardrails. Prior to

### **Transport for NSW**

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construction, the Proponent is required to obtain endorsement from JHR and approval from TfNSW to the design and construction of the overbridge as part of a formal application. As such, JHR is not in a position to provide comments on the statement of the design and construction of the bridge at this stage. For the avoidance of doubt, please note this letter does not constitute a final approval from TfNSW in respect to the construction of an overbridge over the rail corridor.

## 5. Road Safety Audit

The independent road safety audit identified the following deficiencies in the existing road conditions:

- insufficient centre line and edge line delineation particularly at night time;
- inconsistent treatments for guiding drivers through curves;
- unprotected roadside hazards within the clear zone, including substantive trees and slopes that are not traversable;
- pavement damage; and
- fretted seal edge.

Given the additional traffic, particularly on Lue Road, consideration needs to be given to how these deficiencies will be addressed as part of the development.

## 6. Concurrence

TfNSW withholds its concurrence, pursuant to section 138(2) of the *Roads Act 1993*, until such a time as more detailed information is provided on the works proposed within the road reserves of the affected classified roads.

Please confirm with TfNSW that SSD-5765 will not be determined until TfNSW has had an opportunity to undertake a thorough assessment of the proposed development, following provision of the above-mentioned additional information. If the department determines that it will not require the requested additional information, it is requested that TfNSW be provided with the opportunity to provide recommended conditions of consent for this development.

If you have any queries or wish to discuss this matter further, please contact Andrew McIntyre, Manager Land Use Assessment, me on (02) 6861 1453.

Yours faithfully



Sharon Grierson  
Acting Senior Manager Regional Customer Services  
West Region

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