

Howard Reed  
Director - Resource Assessments  
Department of Planning & Environment  
GPO Box 39  
Sydney NSW 2001

**ATTN: Matthew Sprott, Senior Planning Officer**

Dear Mr Reed

**Drayton South Coal project in the Hunter Valley (SSD 6875)**

Thank you for your email dated 15 May 2015 requesting Transport for NSW provides comments on the above referenced State Significant Development. Roads and Maritime Services will be providing a separate response.

Transport for NSW (TfNSW), has reviewed the documentation presented in support of the development application and provides the following comments.

The Traffic and Transport Impact Assessment submitted in the 2015 application is the same report submitted in their 2012 submission. As such, issues previously flagged by TfNSW to the Department of Planning & Environment in December 2012 remain:

- The proposal documentation cites the ARTC 2009 Hunter Valley Corridor Capacity Consultation Document. Subsequent to the issue of the 2009 Strategy, ARTC has issued revised strategies in 2011 and 2012. Drayton should reference the more recent documents and demonstrate engagement with ARTC, the Hunter Valley rail network owner. The 2014-2023 Hunter Valley Corridor Capacity strategy can be found at: <http://www.artc.com.au/library/2014%20HV%20Strategy%20-%20Final.pdf>.
- The train described in Section 6.1 (p. V-71) does not reflect those operating on the Hunter Valley network. Trains serving most mines in the Hunter Valley use either 80 or 91 x 120t gross wagons (noted on p. 28) not 100t wagons. It is also noted that 120t wagons generally carry 95 to 98t of coal. However, the assumed payload of 8,500t per train is appropriate.
- It is noted that Edderton Road will be realigned for this project (south end) in 2019 for BHP-Billiton's Mt Arthur coal mine (north end). The supporting documentation does not outline the cumulative impact of the works or whether there is a community benefit from undertaking these works jointly.

Rail issues:

- There needs to be consistency between rail traffic generation reported in the EIS Main Report and that in the Traffic and Transport Impact Assessment. The main report (p. 7-117) states "A total of 308 trains will be needed to transport approximately 5.2 Mt of product coal to Newcastle". Using the same production yield and train payload, approximately 612 trains per year per direction would be required for this freight task. This number is more aligned to the forecast train volume generations identified in the Traffic and Transport Impact Assessment (Section 6, p. V-72). The supporting documentation needs to demonstrate the ability of the rail network to accommodate this increase in demand.

Road issues:

With the 2012 Traffic and Transport Impact Assessment being resubmitted without modification, the 2015 Application appears to have insufficiently addressed the traffic issues (in either their Main Report or Traffic Assessment) requested by the Muswellbrook Shire Council in the 2015 SEARs, such as:

- Project impact on Skellatar Stock Route
- Management of oversize vehicles
- Estimation of vehicle mass and equivalent standard axles

TfNSW would be happy to discuss our comments, and review any revised documentation for the development application.

Should you have any questions regarding this matter, please contact Robert Rutledge, Principal Land Use and Transport Planner on 8202 2203 or [Robert.rutledge@transport.nsw.gov.au](mailto:Robert.rutledge@transport.nsw.gov.au).

Please note for future reference; when sending proposals to TfNSW via email, could you kindly use the following email address: [development@transport.nsw.gov.au](mailto:development@transport.nsw.gov.au)

Yours sincerely



17/6/15

Mark Ozinga  
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