



20 June 2019

File No: F01944 - 19/137615

Andrew Rode  
Department of Planning & Environment  
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Dear Mr Rode

**SUBJECT                      Clarence Colliery - Modification 4 - DA 504-00 – Statement  
of Environmental Effects**

The Blue Mountains City Council appreciates the opportunity to comment on the proposed modification to Development Consent DA 504-00 for Clarence Colliery - Statement of Environmental Effects, being a modification seeking to modify Condition 7 Schedule 2 of DA 504-00 pursuant to Section 4.55(2) of the EP&A Act to:

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

The Council notes that the impacts on the Blue Mountains Local Government Area coming from the proposed increase of total coal haulage by road will increase the total number of trucks which transport coal from Clarence Colliery from 25 trucks per day (50 truck movements) to 40 trucks per day (80 truck movements).

The impacts on Mt Victoria from additional heavy vehicle movements along Station Road and west along the Great Western Highway include noise, together with adverse impacts upon pedestrian and cyclist safety. The Council is particularly concerned that there is potential for up to 80 heavy vehicle movements per day travelling through the village centre which includes Memorial Park, past the Mt Victoria Public School. The proposed route is the main pedestrian and cycle access route for children, other residents and visitors, travelling to school or accessing the shops and main park in the village.

Council notes that the Great Western Highway is classified as a State Road and under the care and control of Roads and Maritime Services (RMS). Any additional maintenance as a result of the additional truck movements is therefore the concern of RMS, the Council is extremely concerned that additional maintenance is put in place to ensure the current standards are maintained. The use of Harley Avenue, a regional road which is maintained by the Council will be impacted by the increase in

heavy vehicle numbers. Additional funding will need to be provided to maintain this connection between the state road networks.

Also of concern is the interaction of truck traffic with tourism traffic on the GWH. There is considerable collateral around this tourism resource.

The Blue Mountains has been subjected to a cumulative increase of heavy vehicle movements over the past 10 years. This has been primarily arisen as a result of the increase in construction activities in Sydney basin from the cartage of bulk quarry products from areas west of the LGA.

#### Drive Neighbourly Agreement – ‘Respect...Our Code on Blue Mountains Roads’

Such is the Council's concern with the movement of freight and bulk materials across the Blue Mountains, it initiated its own high profile campaign. The ‘Respect...Our Code On Blue Mountains Road’ initiative arose out of the 2016 “Blue Mountains Heavy Vehicle Drive Neighbourly Agreement” and is endorsed by community groups, major industry participants and government agencies, including the Australian Trucking Association, Road Freight NSW, the region's main heavy vehicle operators, Roads and Maritime Services and NSW Police.

At the core of the Respect initiative is promoting road safety (including implementation of advanced heavy vehicle safety technology), and reducing the impact of HV emissions and noise on residential areas.

The Respect program will reinforce good driver behaviour, especially:

- 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.

Impacts in the Blue Mountains will be minimised by:

- Installing special mufflers Reducing heavy vehicle emissions and noise – especially exhaust brakes – is also a key focus of the campaign. Working with the industry, engine brake noise close to residential to reduce engine brake noise
- Ensuring exhaust systems are in good operating condition
- Turning off noisy engine brakes in built-up areas.

The project proponent, if approval was granted, should seek to have all haulage contractors partner with the Council on this Agreement and their support for the delivery of the “Respect...Our Code on Blue Mountains Roads” Heavy Vehicle Drive Neighbourly Agreement.

The Council is strongly committed to pedestrian and cycle safety as evidenced by the Blue Mountains Bike Plan 2020 and Pedestrian Access & Mobility Plan 2025, which proposes an off highway shared pedestrian cycleway across the mountains, through and linking the villages, including Mt Victoria.

The Council would like to take this opportunity to request that the Department of Planning & Environment consider requiring the development to contribute to the upgrading of pedestrian/ cycle facilities along Station Street and the Great Western Highway.

If you would like to discuss the Council's submission further, please contact Glenn Sherlock Program Leader Transport & Infrastructure Planning on 47805692 or [gsherlock@bmcc.nsw.gov.au](mailto:gsherlock@bmcc.nsw.gov.au)

Yours faithfully

A handwritten signature in black ink, appearing to read 'Gary', followed by a horizontal line and a period.

GARY PARSONS  
Manager Infrastructure & Major Projects