

9 March 2017

SF2016/032905; WST16/00045/02

The Manager
Resource Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Elle Donnelly

Dear Ms Donnelly

SSD-7538: Lots 7313, 7314, 7316, 7318 & 7319 DP 1185108 and Lots 3870, 3871 & 4143 DP 757298; Broken Hill North Mine, Broken Hill; Recommencement of Operations

Thank you for your email on 2 February 2017 referring SSD-7538 to Roads and Maritime Services for comment. Reference is made to your telephone conversation with Andrew McIntyre from Roads and Maritime on 7 March 2017 and your emails to Mr McIntyre on 27 and 28 February 2017.

The documentation submitted in support of the proposed development has been reviewed. Roads and Maritime notes the proposal involves the following:

- Recommencement of underground mining at North Mine.
- Extraction and crushing of up to 300,000 tonnes per annum of ore material with a total projected extraction of 4.2 million tonnes over 25 years.
- Transporting crushed ore via road to Broken Hill South Mine using 30 metre A-double road trains. Transportation hours are proposed to be restricted to between 7:00am to 7:00pm with a maximum of 96 trips (48 each way) per day, maximum of eight trips per hour (four each way).

Roads and Maritime Services

Following discussions with the Department of Planning and Environment (DPE), Roads and Maritime is not in a position to provide comments, and at this time, objects to the proposed haulage of ore using 30 metre road trains between North and South Mines. In objecting to the proposal, Roads and Maritime notes three outstanding issues that require further information and clarification:

1. State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007

Clause 16(1) of the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007* (Mining SEPP) states:

Before granting consent for development for the purposes of mining or extractive industry that involves the transport of materials, the consent authority must consider whether or not the consent should be issued subject to conditions that do any one or more of the following:

- (a) *require that some or all of the transport of materials in connection with the development is not to be by public road,*
- (b) *limit or preclude truck movements, in connection with the development, that occur on roads in residential areas or on roads near to schools,*
- (c) *require the preparation and implementation, in relation to the development, of a code of conduct relating to the transport of materials on public roads.*

Roads and Maritime, notes that under clause 16, it is the responsibility of the DPE as the relevant consent authority, to consider whether some or all of the transport of materials is not to be by public road.

The applicant in section 2.14.5 of the Environmental Impact Statement (EIS) has provided reasons for the proposal not recommencing haulage of ore by rail to South Mine. The reasons given are:

- Prior to 2008, the mine's access to the ARTC controlled section of rail network was limited.
- Prior to 2008 the total tonnage of ore allowed to be transported by rail was restricted to 20,000 tonnes per month (the current proposal requires the transportation of 25,000 tonnes per month).
- Rail corridor movements have increased substantially since 2008.
- Use of road transport affords a greater level of flexibility.

There is no evidence that the applicant has made contact with ARTC to enquire what access would be available and what tonnage could be transported by rail. In your email of 27 February 2017 you requested Roads and Maritime's opinion regarding transportation by rail. In this regard it is our opinion that the applicant has not demonstrated that some or all of the haulage of ore cannot be by rail. As previously stated, Roads and Maritime notes the responsibility for considering if haulage can or cannot occur on rail sits with DPE. In this regard, Roads and Maritime requests DPE advise its conclusions after consideration of clause 16(1) of the Mining SEPP.

2. Haulage of ore by road including Menindee Road (MR66) and Crystal Street

The EIS identifies the preferred haulage route as North Mine access road, Barrier Highway (HW8), Menindee Road, Crystal Street, South Road (HW22), Gypsum Street and South Mine access road. Roads and Maritime does not object to this proposed route, noting that works would be required at the intersections of North Mine access road and Barrier Highway, Barrier Highway and Menindee Road, Gypsum Street and South Road and South Mine access and Gypsum Street to accommodate the longer vehicles. Road pavement improvements along the route would also be required.

The swept path analysis provided by the applicant has not been thoroughly reviewed and assessed by Roads and Maritime on the basis that it now appears this route will not be pursued. Clarification from the applicant is sought confirming the proposed haulage route.

3. Haulage of ore by road via Iodide Street (HW22)

Roads and Maritime has received verbal advice that this route is now preferred by the applicant. It appears from the swept path analysis provided by the applicant that the use of this section of road in the haulage route would require widening of the Iodide and Crystal Streets intersection, relocation of an electricity pole, setback of a hold line at the Iodide/Argent intersection, loss of car parking in Iodide Street and road shoulder reconstruction. Roads and Maritime, at this time, is not satisfied that 30 metre road trains will be able to safely pass each other through this section of the road network.

Please note that 30 metre road trains are Restricted Access Vehicles (RAVs) and this section of road is currently open to RAVs up to 36.5 metres in length. At the time this part of the network was gazetted to permit 36.5 metre vehicle access, the road environment was assessed, including geometry and traffic volumes. An increase in length and/or volumes of vehicles using this route would change the environment. Should such change be assessed as adversely impacting road safety, the gazettal may be revoked or modified. It is important to be aware that the ability for RAVs to operate on this route should not be assumed and that improvements may be necessary to ameliorate an increased road safety risk, particularly that of conflict between RAV's and other vehicles.

Should the use of the rail not be considered a viable option for the transportation of ore, and, the Menindee Road/Crystal Street route no longer part of the applicant's proposal, careful assessment of the preferred route will be required before Roads and Maritime will be in a position to comment on the proposal.

Roads and Maritime is prepared to undertake its own detailed analysis of road haulage operations, but prior to doing so, the following information is requested:

1. Advice from DPE as to whether some or the entire haulage task can occur on rail.
2. Should the response in relation to (1) be no, clarification of the current approved haulage route.
3. Submission of a road safety audit for the proposed haulage route. The audit is to be prepared by a level 3 recognised road safety auditor and include template reviews of all intersections along the route.

Please confirm with Roads and Maritime that the development application will not be determined until such time as Roads and Maritime has had an opportunity to comprehensively assess the development application following provision of the additional information.

To discuss this matter further please contact Andrew McIntyre, Manager Land Use Assessment, on 02 6861 1453.

Yours faithfully



Susie Mackay
Network & Safety Manager
Western