



11 July 2016

SF2012/006519; WST11/00022/08

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

**Attention: Mr Stephen Shoesmith**

Dear Ms Shoesmith

**MP10\_0138 MOD 3: Maules Creek Coal Project**

Thank you for your email on 17 June 2016 referring MP10\_0138 (Mod 3) to Roads and Maritime Services for comment.

Roads and Maritime notes the proponent seeks to amend condition 63 of MP10\_0138. Condition 63 states:

*The Proponent shall ensure that construction and operational employees are predominately transported to the site by shuttle bus, consistent with the assumptions used in the traffic study undertaken for the EA.*

*Note: The EA assumed that 90% of construction employees and 90% of operational workers based on peak travel movements would be transported to the site by shuttle bus from Boggabri township. However, the shuttle bus service could also operate from Gunnedah and Narrabri.*

In the proponent's submission, the requested amendment to condition 63 reads as follows:

*The proponent shall ensure that **a shuttle bus service is available to facilitate the transportation of construction and operational employees to site. MCC will target that 70% (averaged per week) of the operations, maintenance and CHPP wages employees would utilise the bussing service.***

**Roads and Maritime Services**

Roads and Maritime objects to the proposed amendment, as submitted. Whilst Roads and Maritime is prepared to support a reduction in the requirement from 90% to 70% of employees using the shuttle bus provided, the use of the word 'target' is not subscripitive. The condition, as worded, could be satisfied irrespective of the percentage of employees actually using the service. Further, no details have been provided on how the proponent will manage safe mine commuter trips for the remaining employees not using the service.

Roads and Maritime recommends Department of Planning and Environment require the proponent to provide the following additional information:

- A revised amendment to condition 63 that includes a measurable and enforceable commitment for employees using the shuttle bus service that the proponent must achieve. In this regard, Roads and Maritime suggests the following:

*A shuttle bus service is to be provided to facilitate the transportation of at least 70% of all construction and operational employees to the mine site. The proponent is to provide details of compliance with this requirement in the Annual Reviews.*

- Details of measures and programs to be employed by the proponent to enforce, or at least encourage, mine staff to travel to and from work safely and/or reduce the exposure of mine staff to risks by minimising travel or providing safe travel options.

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. If you wish 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