

The Director
Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Stephen O'Donoghue

**PUBLIC EXHIBITION FOR THE COBBORA COAL PROJECT
ENVIRONMENTAL ASSESSMENT**

Dear Mr O'Donoghue,

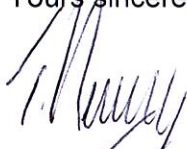
Thankyou for your letter dated 28 September 2012 regarding your request for Transport for NSW to provide comment for the public exhibition of the Environmental Assessment (EA) for the above proposal and I apologise for the delay in responding.

Transport for NSW has reviewed the EA and associated road and rail assessment reports and has identified a number of road and rail issues associated with the proposal that will be required to be addressed by the proponent. These issues are referred to in greater detail in Attachment A – Rail Issues and Attachment B – Road Issues.

Transport for NSW would appreciate the opportunity to provide further comment on any changes that may result from the response to submissions process.

Should you have any questions regarding this matter, please contact Aleks Tancevski on 8202 2811 or Aleks.Tancevski@transport.nsw.gov.au

Yours sincerely,



Mark Ozinga
**Manager, Land Use and Transport Planning
Planning and Programs**

RAIL ISSUES

In relation to Chapter 13 of the EA report *'Rail Transport'* the following matters are raised for the Department's consideration in the determination of the proposal:

- Page 318 of the EA report states that *'it is anticipated that ARTC and RailCorp will use part of the network access fees received from CHC to contribute to the costs of capacity improvements to potential additional passing loops at Awaba North on the RailCorp Central Coast to Newcastle Line'*.

Transport for NSW advises that an appropriate funding mechanism for network enhancements will be identified in due course.

- Page 335 of the EA report, 13.6.4 - *Level Crossing Waiting Times*, states that *'it is unlikely the additional coal trains will be travelling through Newcastle at the busiest times of the morning (7:00am to 9:00am) and afternoon (4:00pm to 6:00pm), it will be largely the off-peak and night time traffic that will be affected'*.

The timetabled train paths are still being developed with Transport for NSW / RailCorp. When the final train configurations are finalised with power stations, the indicative train timetables will be confirmed. Operationally, rail network is unable to restrict the hours of operations for particular trains on specific network segments as this would significantly impact on broader network efficiency and adversely affect all network users.

- Page 337 of the EA report, 13.7.3 - *Level Crossing Waiting Times*, states that *'Delays at St James Road and Clyde Street crossings are expected to be continued to be monitored. The NSW rail transport authorities will continue to periodically reassess the economic viability of improvements, taking into consideration the recently identified range of options for improvements (RailCorp 2009). The next assessment should consider use of level crossings by coal trains from the Project'*.

The draft NSW Freight and Ports Strategy identifies a project to provide real time information to motorists on train arrivals/expected road delays and intersection improvements on alternate routes as the preferred option to improve overall travel time in the vicinity of the Adamstown level crossing. This was announced by the Member for Newcastle Tim Owen AM MP on 17 September 2012. The draft Strategy also identifies a Newcastle Rail Bypass as a long term solution which would remove the majority of freight trains on this section of the network through Newcastle.

In relation to Appendix L of the EA report *'Rail Assessment Report'* the following matters are raised for the Department's consideration in the determination of the proposal:

- Whilst the methodology for the crossing delays is a sound one (i.e. a survey undertaken in March 2012), the survey results do not distinguish between Up and Down loaded / unloaded services.
- The final configuration of the trains operating from Cobbora trains to the Lake Macquarie power stations are assumed to be between 1,370 and 1,550 metres long. However, the final configuration is yet to be confirmed by the power generators.

- Page 19 of the report states that available paths can be accommodated on existing networks by 'sharing' of the Teralba and Newstan paths. This is not the position of Transport for NSW; both mines have different train path requirements to meet shipping and export coal assembly requirements.
- Page 21 notes that the unloading points at Eraring and Vales Point may require modification. The timing of this work will determine train configuration.
- The Cobbora rail spur connection to the north (triangular junction) is mentioned several times in the text but does not appear to be shown in any of the drawings. Transport for NSW understands that this is an option that is unlikely to be constructed.

ROAD ISSUES

In relation to Appendix K of the EA report '*Road Assessment Report*' the following matters are raised for the Department's consideration in the determination of the proposal:

- The level of car sharing appears to be fairly optimistic and may be underestimating trip generation. Further detail with regard to trip generation for light vehicles and car traffic shall be addressed in the submissions report.
- No consideration has been given to the movement of any oversize or wide / high loads. The proponent should identify any major impacts of oversize or wide / high loads on any intersections on the State road network and outline any proposed improvements and / or mitigation measures to off-set these impacts.
- Consideration should be given to carrying out a Traffic Analysis on Rural Roads analysis (TRARR), or similar for the Golden and Castlereagh Highways to assess the need for overtaking lane provision.
- No details have been provided regarding the proposed pavement design standards and design speeds for the new road links. The proponent shall demonstrate to the satisfaction of the Roads and Maritime Services that any new road links have been designed with the appropriate pavement design standards and design speeds.

Furthermore the following road issues have been identified by Roads and Maritime Services (RMS):

Intersection Upgrades

- The intersection of Cobbora Road and Golden Highway (HW27) shall be upgraded to include a left turn lane and a basic right turn facility (BAR) to ensure efficient movement of traffic exiting and entering Golden Highway at this location. Following construction and/or operation of the mine, adequate funding and resources to monitor if the BAR facility is adequate or higher level intersection upgrade is necessary. Should upgrading be necessary, such works should be at the expense of the mine operator.
- The proposed new Spring Ridge Rd/Golden Highway intersection will require a channelised right turn (CHR) plus a left turn lane (CHL).
- Laheys Creek Road/Castlereagh Highway (HW18) will require a left turn lane and a basic right turn facility (BAR) to ensure efficient movement of traffic exiting and entering Golden Highway at this location. Following construction and/or operation of the mine, adequate funding and resources to monitor if the BAR facility is adequate or if higher level intersection upgrade is necessary. Should upgrading be necessary, upgrading of the intersection should be at the expense of the mine operator.
- Intersection upgrades located on state roads will require the developer to undertake private financing and construction of works on roads in which RMS has a statutory interest. A formal agreement in the form of a Works Authorisation Deed (WAD) is required between the developer and RMS prior to these works commencing. The WAD's are the agreements by which all works as defined in each deed, including the proposed rail underpass of the Castlereagh Highway and works within and connecting to classified roads, will be

administered by RMS and include the design, construction, alteration, maintenance and demolition/removal of those works.

Note: RMS suggests that the project approval should expressly acknowledge that WADs and the terms provided in them will prevail to the extent of any inconsistency between the matters set out in the EA and the terms of each WAD.

- A Road Occupancy Licence is required prior to any works commencing within three metres of the travel lanes in Castlereagh and Golden Highways. Prior to any such works commencing, a licence will need to be obtained by contacting Mr Paul Maloney on (02) 6861 1686.

Castlereagh Highway Realignment / Rail Underpass

- RMS will support the permanent minor realignment of the Castlereagh Highway to allow construction of the rail underpass. The redundant section of highway would need to be removed and rehabilitated once completed. This realigned section of highway would be subject to a Works Authorisation Deed which would include security deposits for the maintenance and possible future removal of the underpass in the event the mine is decommissioned. Design detail including the bridge and pavement design, will require RMS approval and will be subject to regular inspections to ensure satisfactory construction. The design speed for the realignment shall be 100km/h and be in accordance with the appropriate Australian Standards and Austroads guidelines.
- The manager responsible for the operation for the private rail line which will pass beneath the realigned Castlereagh Highway will need to enter into a Rail Interface Agreement.

Traffic Safety

- Prior to the commencement of constructions works associated with the intersection upgrades and the realignment of the Castlereagh Highway, road safety audits are to be conducted at the design and pre-opening stages in accordance with *Austroads Guide to Road Safety Part 6: Road Safety Audit (2009)*. The developer is responsible for mitigating deficiencies noted within the audit report.
- Prior to construction works commencing on the site a Traffic Management Plan (TMP) shall be prepared in consultation with RMS and the affected Councils and submitted for approval. The TMP shall address the matters raise in Section 12.4 of the EA and any findings and/or commitments made in the TMP shall be implemented.
- Rural school bus stops on both classified and local roads affected by the mine operations and key transport links shall be upgraded to provide a safe "pull-over" area for buses and safe pick up/drop off of school students prior to the commencement of construction works.