



**Transport
for NSW**

Mr Colin Phillips
Team Leader Mining Projects
Department Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Phillips

Northern Coal Logistics Project EIS for Public Exhibition

Reference is made to the above project currently on public exhibition. Transport for NSW (TfNSW) provides its comment on the above Environmental Impact Statement (EIS). Roads and Maritime Services will provide a separate response to the above EIS.

The Traffic Impact Assessment undertaken by the proponent does not adequately meet the Director General's Requirements (DGRs) in particular the following:

- Prediction of rail traffic of the project to the Port of Newcastle, Port Kembla, and/or Vales Point Power Station.
- Detailed assessment of the potential impacts of rail traffic on the rail network and at the railway crossings.
- Detailed description of the mitigation measures that would be implemented on the rail network and at the railway crossings.

TfNSW requests that the proponent undertakes further detailed assessment for the issues outlined in **TAB A** and revises the Traffic Impact Assessment Report.

If you require further clarification regarding this matter, please don't hesitate to contact me on 8202 2198.

Yours sincerely

18/1/14

Mark Ozinga
**Manager Land Use Planning and Development
Planning & Programs**

CD14/20350

TAB A – Details Comments on the EIS documents

The detailed comments in the EIS are provided below:

Further Details to be Provided

TfNSW requests the applicant provides further details on the following:

- The proponent is seeking approval to the following:

“Increase the tonnage of coal transported from the Newstan Colliery Surface Site rail loading facilities by train to the Port of Newcastle and/or Port Kembla (for export) and/or Vales Point Power Station from 3 Mtpa to up to 8 Mtpa”.

The destination of the additional coal tonnages from the project will determine the impact this rail traffic has on the rail network.

TfNSW requests that the likely train movements, frequencies required to service the project's transportation requirements between Newstan Colliery Surface Site and the Port of Newcastle, Port Kembla, and/or Vales Point Power Station and associated impact on rail network be provided, noting the different tonnages of coal to be received at each destination.

- The EIS on page 362 indicates the following:

“the Northern Coal Logistics Project does not propose to increase the number of trains above the current approved maximum of eight trains per day”.

It should be noted that the proponents only have approval in their development consent for eight train movements a day from Newstan, it does not have eight return train paths.

Based on the above, TfNSW requests that the proponent provides actual train path requirements for the Northern Coal Logistics Project from Newstan.

- Discussion and work with the network owner(s) on the issues associated with access to the rail network, such as pathing, timing and any necessary infrastructure required to support the proposed use of the network.
- Whether current infrastructure at the Port of Newcastle, Port Kembla and Vales Point Power Station is capable of handling additional tonnages of coal in the proposed train configurations.

Capacity Constraints in the Eraring Balloon Loop

- The proponent needs to note the train paths to Eraring power station that use Newstan rail infrastructure. Eraring balloon loop only has a north facing connection to the Main North Rail Line, so trains coming from the south use Newstan balloon loop to turn around. These additional trains on the Newstan balloon loop are a capacity constraint on the loop.

Traffic Impacts and Safety Risks at Level Crossings

- On page 364 of the EIS, the proponent states the following:

“it is considered that the capacity of the Main Northern Railway Line is a regional issue that is required to be managed by the State authority given it is utilised by many customers/projects. Any problems perceived as significant with the operation of the railway level crossings in Newcastle may require a regional solution, such as closure of the level crossings (i.e. re-routing of traffic) or provision of an alternate freight rail line (for example, Hexham to Toronto), to be considered at a more strategic planning level (as opposed for individual projects)”.

It should be noted that the project has the potential to generate additional traffic using existing level crossings which needs to be assessed. Additional rail traffic at level crossings may change the risk profile of the crossing as well as increase road traffic delays and waiting times at level crossings in particular at the Glebe Road, Adamstown and Clyde Street, Hamilton North railway crossings.

Movement of Coal by Rail to Vales Point Power Station

- Movement of coal by rail to Vales Point Power Station has not been included in the DGRs which only list movements by rail to the port of Newcastle and/or Port Kembla.

Incorrect Information in the Report

- The project train numbers from Wallarah are lower than those stated in the Wallarah EIS. The Wallarah EIS quotes up to 5 coal trains per day while the Northern Coal EIS estimates 2-3 trains per day.
- Rail access fees for coal on the RailCorp network are not “take or pay” as suggested by the EIS.

- On page 365 of the EIS, it states that Clyde St in Hamilton North is crossed the Main Northern Railway Line, operated by RailCorp. This railway is leased to ARTC and is not operated by RailCorp.