

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

Attention: Stephen O'Donoghue

**COBBORA COAL PROJECT (MP 10\_0001)  
EXHIBITION OF THE PREFERRED PROJECT REPORT AND RESPONSE TO SUBMISSIONS**

Dear Mr O'Donoghue,

Thank you for your email dated 13 February 2013 regarding your request for Transport for NSW to review and provide comment on the Preferred Project Report (PPR) and Response to Submissions (RS) for the above proposal.

Transport for NSW has reviewed both Chapter 11 – 'Road Transport' and Chapter 12 – 'Rail Transport' of the PPR and RS and has identified a number of outstanding issues that remain to be addressed by the proponent. These issues primarily relate to Chapter 12 – 'Rail Transport' and have been outlined in greater detail in Attachment A.

Transport for NSW also supports the issues raised in the letter from Roads and Maritime Services dated 6 March 2013 with regard to road issues.

Should you have any questions regarding this matter, please contact Aleks Tancevski on 8202 2811 or [Aleks.Tancevski@transport.nsw.gov.au](mailto:Aleks.Tancevski@transport.nsw.gov.au)

Yours sincerely,



22/4/13

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

### Rail Transport Issues:

#### *Section 12.2.1:*

The use of spare paths or existing train paths for Cobbora project requirements, even if those paths could be made feasible, overlooks the issue that this project is in addition to the existing haulage requirements of current rail network users and therefore, in aggregate, the network still needs to support more train hauls, which requires additional train paths being provided.

Transport for NSW agrees with the comment: "Additional export coal train paths from the Hunter Valley lines to the Port of Newcastle will not affect the operation of the two existing level crossings in Newcastle at Clyde Street and Adamstown, as the railway tracks to either the Kooragang or Carrington terminals diverge from the railway network to the north of these two level crossings."

In terms of using existing coal train paths for Cobbora working, this notion is substantially constrained by the following factors:

- Freight, including coal train access is significantly constrained within the RailCorp network. On the Australian Rail Track Corporation (ARTC) network passenger and freight/coal services are effectively separated between Maitland and the Newcastle Coal Terminals at Carrington and on Kooragang Island. There is no corresponding functionality within the RailCorp network in this region.
- Steep grades and lack of suitable passing facilities for slower freight trains on the RailCorp network create significant differences in running times. This limits the scope for the programming of slower, laden trains clear of the more numerous, faster services on a fully shared network.
- The Cobbora Coal Project will require laden southbound train paths and empty northbound returning train paths. The export coal hauls from existing mines such as Newstan and Teralba operate as laden northbound train paths and southbound empty returns. They run over a shorter distance of the network compared with projected Cobbora haulage to Eraring and Vales Point balloon loops. As a consequence these two sets of operational combinations will not have readily interchangeable paths because there is a marked difference between them in their respective train running performances across the network.
- Train paths allocated to specific rail operators have contractual obligations to provide required access for their business needs and therefore it cannot be presumed those obligations are totally flexible for use by others, such as Cobbora.

Table 12.2 makes assumptions regarding:

- Train consists, which are yet to be finalised.
- Train routing through the ARTC/RailCorp interface. While the routing of trains via nominated tracks may be optimal for the trains to/from Cobbora, operationally these may not be achievable without significant delays to freight and passenger trains operating on the line.

*Section 12.2.2:*

Transport for NSW does not understand this to be accurate: "If the future configurations of the Eraring and Vales Point Power Station loops are not upgraded it may limit the amount of coal delivery to the power stations, so that the number of trains remains consistent with that assessed in the EA." Transport for NSW understands the contractual obligation to provide coal to the mines is established by tonnages to be delivered to the power stations, not the number of trains.

*Section 12.2.4:*

Transport for NSW has computer modelled Cobbora requirements for train paths and supporting infrastructure upgrades. We confirm as raised in the previous responses, this work did take into account as with other freight operations, that the future Cobbora trains will also be allocated train paths clear of commuter peaks which are required to integrate with those in the Sydney Metropolitan area as well. In noting this, RailCorp and Transport for NSW cannot guarantee that all trains will always be operated clear of peak periods for operational reasons.

*Section 12.2.7:*

As noted in 12.2.4, while this is currently the case RailCorp and TfNSW cannot guarantee that all trains will always be operated clear of peak periods for operational reasons.

*Section 12.2.15:*

This section states that *"Before the upgraded passing loops are constructed at Awaba North the daily number of coal trains serving the Eraring Power Station from the Project will remain as described in the EA but will be restricted in length."* – This may not be correct for the RailCorp network. While the number of trains leaving the mine may be the same, there is an option for these trains to split in Newcastle.

*Sections 12.2.3, 12.2.5, 12.2.6, 12.2.8, 12.2.9, 12.2.13, and 12.2.14:*

Matters for ARTC to cover and respond if need be by them.