

WHITEHAVEN TEMPORARY ROAD HAULAGE INCREASE MODIFICATION
RESPONSE TO SUBMISSIONS

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1 INTRODUCTION

Whitehaven Coal Limited (Whitehaven) prepared the *Whitehaven Temporary Road Haulage Increase Modification Environmental Assessment* (the EA) for the proposed Whitehaven Temporary Road Haulage Increase Modification (the Modification) that is being assessed under section 75W of the New South Wales (NSW) *Environmental Planning and Assessment Act, 1979* (EP&A Act).

The EA was placed on public exhibition by the NSW Department of Planning and Environment (DP&E) from 20 October to 3 November 2016.

During this period, Government agencies, non-government organisations, businesses and members of the public were invited to provide submissions on the EA to the DP&E.

The DP&E has requested that Whitehaven review and respond to the submissions that were received.

Whitehaven's responses to submissions have been structured as follows:

- Part A – Responses to submissions from Government agencies.
- Part B – Responses to submissions from members of the public that objected to the Project.

No submissions were received from non-government organisations.

2 PART A – RESPONSES TO GOVERNMENT AGENCY SUBMISSIONS

Responses to issues raised by Government stakeholders are provided in the subsections below.

2.1 GUNNEDAH SHIRE COUNCIL

Issue/Comment

Council and Whitehaven Coal currently have a roads maintenance agreement, with Council contributing 5% to the maintenance cost of Bluevale Road. With the increased traffic movements proposed by the modification, it is proposed that Council's contribution for the road maintenance decrease to 4.38%.

Response

Whitehaven agrees to revise the roads maintenance agreement with the Gunnedah Shire Council (GSC) to reduce the contribution payable by the Gunnedah Shire Council for the maintenance of Blue Vale Road from 5% to 4.38% (i.e. with an equivalent additional contribution to be made by Whitehaven), in accordance with Condition 3(55) of PA 10_0047 and Condition 3(26) of PA 10_0015.

Issue/Comment

Road Safety Audit – the submitted Road Safety Audit notes that the right turn storage length on Bluevale Road at Shannon Harbour Road is too short for deceleration from 100km/h posted speed limit and storage of at least one truck. The Whitehaven commitment dismisses the audit observation. It is recommended that the intersection be assessed in accordance with the Austroad Guidelines to determine whether any road works are required as a result of the proposed modification.

Response

As noted in the EA, the intersection is part of the Rocglen Coal Mine designated haul route, and has been in use for approximately eight years without incident. GSC accepted the Shannon Harbour Road reconstruction and sealing, including its intersection with Blue Vale Road on the 20th May 2011 (reference: 543883, refer attached).

Whitehaven commits to conducting an additional road safety audit of the intersection of Blue Vale Road and Shannon Harbour Road, following approval of the Modification. The road safety audit will be completed by the end of first quarter of 2017.

Issue/Comment

The Road Safety Audit also highlighted the current need for increased maintenance and cleaning of the designated haulage route to improve the visibility of signage, guideposts, lane delineation and pavement. It is recommended that Whitehaven increase the maintenance and cleaning of the designated haul route for the current operations and the proposed increase traffic movements.

Response

Following initial consultation with RMS and GSC, Whitehaven has enhanced the existing haulage route maintenance activities. The current program includes:

- Inspection of the approved haulage route, both daily and after rainfall, to determine if the following actions are required:
 - Engaging GSC to repair pavement;
 - Engaging GSC to repaint delineation lines;
 - Cleaning/maintenance of guideposts and signage; and
 - Any other maintenance identified.
- Routine maintenance activities including:
 - Cleaning/maintenance of guideposts and signage not less than once per month (irrespective of outcome of inspections);
 - Engagement of a GSC street sweeper over an extended route on haulage days; and

- Pavement maintenance, undertaken by GSC.

Whitehaven commits to formalising these practices in a road maintenance protocol, in consultation with GSC, and providing a copy of the protocol to RMS, GSC and DP&E.

Additionally, in consultation with GSC, recent works undertaken have included:

- Resurfacing sections of the Kamilaroi Highway;
- Resurfacing sections of Blue Vale Road (to be completed in approximately 3 weeks);
- Heavy patching sections of Blue Vale Road;
- Commissioning road marking works on relevant sections of the Kamilaroi Highway (to be completed in approximately 3 weeks); and
- Development of a road maintenance schedule for 2017.

2.2 ROADS AND MARITIME SERVICES

Issue/Comment

It is understood that the proposed modification seeks a temporary increase in the total volume of coal to be transported in the 2017 calendar year to 4 million tonnes per annum.

Response

As described in the EA, the temporary increase in the total volume of coal to 4 Mtpa (without construction of the Kamilaroi Highway overpass) is sought for both the 2016 and 2017 calendar years.

Issue/Comment

The Road Safety Audit has identified a number of issues for consideration and the Proponent's commitments are noted.

Response

Noted.

Issue/Comment

The proposal to develop and implement measures to improve the visibility of signage, guideposts, lane delineation and pavement along the designated transport route is supported. Project documents should be updated and submitted to the Consent Authority to demonstrate that appropriate arrangements are in place prior to the proposed increase in haulage movements.

Response

Following initial consultation with RMS and GSC, Whitehaven has enhanced the existing haulage route maintenance activities. The current program includes:

- Inspection of the approved haulage route, both daily and after rainfall, to determine if the following actions are required:
 - Engaging GSC to repair pavement;
 - Engaging GSC to repaint delineation lines;
 - Cleaning/maintenance of guideposts and signage; and
 - Any other maintenance identified.
- Routine maintenance activities including:
 - Cleaning/maintenance of guideposts and signage not less than once per month (irrespective of outcome of inspections);
 - Engagement of a GSC street sweeper over an extended route on haulage days; and
 - Pavement maintenance, undertaken by GSC.

Whitehaven commits to formalising these practices in a road maintenance protocol, in consultation with GSC, and providing a copy of the protocol to RMS, GSC and DP&E.

Additionally, in consultation with GSC, recent works undertaken have included:

- Resurfacing sections of the Kamilaroi Highway;
- Resurfacing sections of Blue Vale Road (to be completed in approximately 3 weeks);
- Heavy patching sections of Blue Vale Road;
- Commissioning road marking works on relevant sections of the Kamilaroi Highway (to be completed in approximately 3 weeks); and
- Development of a road maintenance schedule for 2017.

Under the current approval, there are daily peaks and troughs in daily truck movements. This Modification will not result in an increase in daily peak truck movements. Whitehaven has reviewed current relevant project documents and management approaches and determined that they are adequate for the proposed Modification.

Additionally, Whitehaven has consulted with the haulage contractor and reviewed their relevant project documents, including their Driver Code of Conduct and associated induction procedures, and determined that they are adequate for the proposed Modification.

In accordance with Condition 5(5) of PA 10_0047 and Condition 5(4) of PA 10_0015, relevant documents will be reviewed, and if necessary revised, following approval of the Modification. Document review will be undertaken within one month of approval of the Modification.

Issue/Comment

It is suggested that all relevant project documents be updated to address the proposed increase in peak transport vehicle movements, in particular the Transport Contractor's Driver Code of Conduct and associated induction procedures.

Response

As noted in above, under the current approval, there are daily peaks and troughs in daily truck movements. This Modification will not result in an increase in daily peak truck movements. Whitehaven has reviewed current relevant project documents and management approaches and determined that they are adequate for the proposed Modification.

Additionally, Whitehaven has consulted with the haulage contractor and reviewed their relevant project documents, including their Driver Code of Conduct and associated induction procedures, and determined that they are adequate for the proposed Modification.

Issue/Comment

The Transport Assessment and Road Safety Audit did not comment on the separation distance between intersections on the Kamilaroi Highway. It is unclear if there is sufficient distance to enable acceleration, merging, diverging, deceleration and storage for heavy vehicles manoeuvring between the two intersections. It is suggested that this length is reviewed in accordance with Austroads Guidelines, Australian Standards and RMS Supplements to determine it's suitability for the proposed traffic movements.

Any improvements deemed necessary by the Consent Authority on the Kamilaroi Highway must be designed and constructed in accordance with the current Austroads Guidelines, Australian Standards and RMS Supplements.

Where the Developer is required to undertake road works on the classified (state) road, a 'Works Authorisation Deed' (WAD) with Roads and Maritime would be required. All works would be undertaken at full cost to the Developer to the satisfaction of Roads and Maritime. Further information on undertaking Private Developments adjacent to classified roads can be accessed on the Roads and Maritime website at:

<http://www.rms.nsw.gov.au/projects/planning-principles/index.html>

Response

As noted in the EA, the intersections of the Kamilaroi Highway along the designated haulage route are currently in use without incident. Under the current approval, there are daily peaks and troughs in daily truck movements. This Modification will not result in an increase in daily peak truck movements. However, Whitehaven commits to conducting an additional road safety audit of intersection separation distances, following approval of the Modification. The road safety audit will be completed as soon as practicable, but not later than by the end of first quarter of 2017.

3 PART B – RESPONSES TO PUBLIC SUBMISSIONS

Responses to issues raised by members of the public are provided below.

Issue/Comment

This modification proposes a temporary increase in road haulage of coal from 3.5Mt to 4Mt per annum. Any increase in coal mining operations including transportation is at odds with Australia's 2015 commitment at Paris to reduce CO2 emissions. Burning coal is incompatible with efforts to keep global temperature rise under 1.5 degrees.

Mining and transporting coal enables burning of coal and is likewise incompatible with this goal.

Current policies are not working to reduce Australia's greenhouse gas equivalents which are rising again (National Greenhouse Gas Inventory Dec 2015). Australia needs to be serious about reducing not increasing coal production for combustion here and elsewhere through its exports.

Whitehaven's justification that "The increased haulage rate is required due to favourable mining conditions which are allowing increased coal recovery without material changes to other approved operations such as the mining rate, operating hours or number of employees" does not consider the negative impacts of this continued activity on "the atmospheric conditions" (global warming) which affect us all.

Response

As described in the EA, the Air Quality and Greenhouse Gas Assessment prepared for the Vickery Coal Project EIS (PAEHolmes, 2012) considered potential greenhouse gas emissions associated with 4.5 Mtpa of ROM coal transport along the southern section of the haulage route following construction of the approved Kamilaroi Highway overpass.

It is noted that while the Modification seeks a temporary increase in total road haulage of ROM coal from 3.5 Mtpa to 4 Mtpa (without construction of the approved Kamilaroi Highway overpass) Therefore, the potential greenhouse gas emissions associated with the Modification would not be greater than the potential greenhouse gas emissions associated with the approved road haulage (i.e. up to 4.5 Mtpa ROM coal).

Issue/Comment

In addition there will be adverse local effects for the community from 88 additional truck haulages per day due to extra noise and pollution and the potential for more road accidents. "Favourable mining conditions" are no longer a satisfactory justification for coal projects (all of which are jeopardise climate and local amenity).

Response

Under the current approval, there are daily peaks and troughs in daily truck movements. This Modification will not result in an increase in daily peak truck movements.

As noted in the EA, no additional exceedances of the relevant air quality or noise criteria are expected as a result of the Modification and existing mitigation measures would remain in place.

Following initial consultation with RMS and GSC, Whitehaven has enhanced the existing haulage route maintenance activities. The current program includes:

- Inspection of the approved haulage route, both daily and after rainfall, to determine if the following actions are required:
 - Engaging GSC to repair pavement;
 - Engaging GSC to repaint delineation lines;
 - Cleaning/maintenance of guideposts and signage; and
 - Any other maintenance identified.
- Routine maintenance activities including:
 - Cleaning/maintenance of guideposts and signage not less than once per month (irrespective of outcome of inspections);

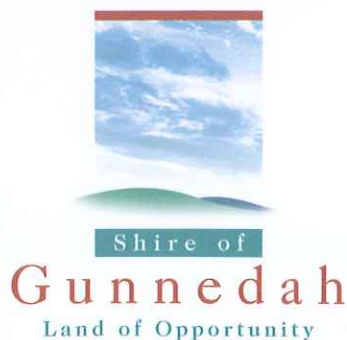
- Engagement of a GSC street sweeper over an extended route on haulage days; and
- Pavement maintenance, undertaken by GSC.

Whitehaven commits to formalising these practices in a road maintenance protocol, in consultation with GSC, and providing a copy of the protocol to RMS, GSC and DP&E.

Additionally, in consultation with GSC, recent works undertaken have included:

- Resurfacing sections of the Kamilaroi Highway;
- Resurfacing sections of Blue Vale Road (to be completed in approximately 3 weeks);
- Heavy patching sections of Blue Vale Road;
- Commissioning road marking works on relevant sections of the Kamilaroi Highway (to be completed in approximately 3 weeks); and
- Development of a road maintenance schedule for 2017.

Additionally, Whitehaven has consulted with the haulage contractor and reviewed their relevant project documents, including their Driver Code of Conduct and associated induction procedures, and determined that they are adequate for the proposed Modification.



The Manager
Constructive Solutions Pty Ltd
PO Box 1498
TAMWORTH NSW 2340

ATTENTION: Mr Ben Rossiter

20 May 2011

Dear Sir

Rocglen Coal Mine Consent

Further to your letter dated 29 April 2011, I am pleased to advise that Council's requirements with regard to the roadworks on its local road network associated with this mine's development have been completed to Council's satisfaction; being the Wean Road reconstruction and sealing and the Shannon Harbour Road reconstruction and sealing including its intersection with the Bluevale Road.

It is noted that a commitment has been given towards minor outlet drainage works in the property below Wean Road to further enhance stormwater flows together with continued monitoring of the minor defects associated with the Bluevale Road concrete slip lane.

Should you require any further feedback please contact me on 6740 2130 during business hours.

Yours faithfully

Wayne Kerr
DIRECTOR INFRASTRUCTURE SERVICES

Contact: 02 6740 2130
Reference: 543883
wk:hj