

4 August 2021

Our Reference: SYD20/00603/03

Departments Reference: MP08\_0150-Mod-3

Rose-Anne Hawkeswood  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Hawkeswood,

**SECTION 4.55 (2) MODIFICATION 3 TO APPIN MINE VENTILATION AND ACCESS PROJECT  
(MP08\_0150-MOD-3) (CAMPBELLTOWN, WOLLONDILLY SHIRE, WOLLONGONG CITY)**

Reference is made to the Department's referral dated 19 July 2021 with regard to the abovementioned modification to the State Significant Development Application (SSDA), which was referred to Transport for NSW (TfNSW) for comments.

TfNSW notes that IMC is seeking to modify the existing Appin Mine approval, pursuant to Section 4.55(2) of the NSW Environment Planning and Assessment Act 1979 (EP&A Act), to incorporate the construction and operation of infrastructure critical to the ongoing viability of the Mine referred to as the Appin Mine Ventilation and Access Project (hereafter referred to as the Project).

TfNSW has reviewed the submitted documentation and provides the following comments to the Department:

**Traffic Assessment Report**

1. Comment

The Traffic Assessment Report (TAR) outlines that Intersection traffic counts were undertaken across the road network during on Tuesday 20 October 2020 and Tuesday 3 December 2019. It is unclear which counts were taken where.

The traffic counts dated Tuesday 20 October 2020 were undertaken during Covid-19 Pandemic and would likely not indicate normal traffic conditions. In addition ideally vehicle counts should be undertaken during a typical day, to include Thursday (or Wednesday) and Friday for the study (not near school/public holidays). This will provide an accurate understanding of the existing traffic conditions and the actual impact of this development application during normal peaks to the surrounding network.

It is understood that due to the Covid-19 Pandemic, counts undertaken at the moment may not be representative. The background traffic to be used in the base model should ideally be from year 2019 (pre-covid). An appropriate growth factor should be applied for earlier counts. Or should an alternative approach be considered to understand the impact of Covid-19 on traffic patterns this should be discussed with TfNSW.

#### Recommendation

It is therefore recommended that the report indicates which counts were undertaken when and that any counts undertaken during 2020 are to not be included or are to be validated with other known data.

#### 2. Comment

TfNSW notes that the modification proposes an upgrade to the site access from Menangle Road. Figure 3B indicates that the site entrance is designed as a seagull. The speed limit along this section of Menangle Road is signposted at 80km/h. In line with TfNSW current guidelines TfNSW does not support the use of a seagull intersection treatment at locations with a speed limit greater than 70 km/h.

#### Recommendation

TfNSW recommends that the following information is provided for review:

- i. Updated concept sketch depicting an appropriate intersection treatment in line with Austroads standards that is supported by TfNSW.
- ii. The swept path of the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS.

#### 3. Comment

It is noted that the development proposes the use of rigid trucks and semi-trailers up to 19 metres. TfNSW highlights that the main access of Menangle Road is not currently classified as a 19m B-double route or as an approved heavy vehicle route. In order for heavy vehicles to use this road further approval will need to be sought.

#### Recommendation

Consultation with TfNSW and Council is to be undertaken to determine if this section of Menangle Road can accommodate the heavier vehicle. It should be noted that mitigation works may be required.

Following receipt of the above requested information, TfNSW will complete its assessment and advise its support (or) otherwise. Further information may be requested following completion of the review.

**Outer Sydney Orbital**

4. TfNSW has reviewed the Modification Report for the subject Project Approval (MP08\_0150) prepared by Niche Environmental and Heritage Pty Ltd and Element Environmental Pty Ltd on behalf of Endeavor Coal dated 30 June 2021, supports the recommended Infrastructure Management Plan (Section 6.15.2) to enable the future development of the Outer Sydney Orbital Stage 1 (OSO1) with the proposed development. Transport for NSW requests the Infrastructure Management Plan and the need to consult Transport for NSW throughout the planning and development process are included as conditions of consent, should the modification be supported.

If you have any further questions, Ms Laura van Putten would be pleased to take your call on (02) 8849 2480 or please email [development.sydney@rms.nsw.gov.au](mailto:development.sydney@rms.nsw.gov.au). I hope this has been of assistance.

Yours sincerely



**Zhaleh Alamouti**

A/Senior Land Use Assessment Coordinator