



28 October 2019

SF2017/281322; WST17/00197/08

A/Director
Resource Assessments
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Elle Clémentine

Dear Ms Clémentine,

**SSD-9505: Lot 1 DP 1058009 and others; 2816 Mid-Western Highway (HW6), Kings Plains
Environmental Impact Statement (EIS)
McPhillamys Gold Mine with 8 Mtpa extraction limit**

Thank you for the notice via the NSW Planning Portal dated 10 September 2019 referring the above application to Roads and Maritime Services for comment.

From review of the submitted documentation, it is noteworthy that:

- The mine proposal includes a site area of 2,513 ha situated between Vittoria Road to the north and the Mid-Western Highway (HW6) a State Classified Road, frontage to the south. Following construction, the mine will be limited to extraction of 8,000,000 tonnes per annum of material, to be processed and deposited onsite, except for the finished gold product which will be transported by road.
- Referral to Roads and Maritime is made under the *State Environmental Planning Policy (Infrastructure SEPP) 2007* Section 104 *Traffic Generating Development*, and the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries SEPP) 2007* Section 16 *Transport*.
- The applicant consulted extensively with Roads and Maritime between February 2018 and May 2019 including a request for Secretary's Environmental Assessment Requirements (SEAR's). However, proposed traffic volumes were not provided by the applicant during these discussions.
- The Traffic and Transport Assessment report ('TTA', EMM Consulting Pty Ltd, August 2019) provides anticipated traffic movements as a result of the development in a table at Appendix 3. A summary of the proposed phases and traffic which form the basis for review is provided in the table below.

Roads and Maritime Services

| Phase | Notes | Daily Traffic |
|--|--|---|
| First 6 months construction period | <ul style="list-style-type: none"> • Works during day shift only • Construction workforce roster 4 weeks on, 1 week off i.e. maximum 80% of Full Time Equivalent (FTE) onsite on any given day. • Access via existing Dungeon Road • Concurrent early mining operations • Construction of new access on Mid-Western Highway | <ul style="list-style-type: none"> • Peak of 480 construction + 50 operations FTE personnel (530) • The TTA states 330 peak movements (inwards and outwards) ^(refer to note 1) • i.e. total at peak of 660 movements per day (inwards plus outwards) or 1.25 movements per worker per day |
| Months 7 to 15 construction period | <ul style="list-style-type: none"> • Mine works occur 24/7 in two shifts • Mid-Western Highway access intersection is operational by Month 7 • Mining ramps up to full capacity Months 12 to 17 • Construction workforce ramps down to zero by Month 16 | <ul style="list-style-type: none"> • Peak of 650 construction + 50 operations FTE personnel (700) • The TTA states 412 peak movements (inwards and outwards) ⁽¹⁾ • i.e. total at peak of 824 movements per day (inwards plus outwards) or 1.17 movements per worker per day |
| Years 2 to 11 mine operations (10 years) | <ul style="list-style-type: none"> • Mine works occur 24/7 in two shifts | <ul style="list-style-type: none"> • Peak of 320 mining operations FTE personnel • The TTA states 378 peak movements (inwards and outwards) ⁽¹⁾ • i.e. total at peak of 756 movements per day (inwards plus outwards) or 2.36 movements per worker per day. |

⁽¹⁾ The TTA Appendix 3 table refers to total daily vehicle movements (inwards and outwards). As each vehicle would be expected to generate approximately two movements per day (in plus out), for clarity the total daily movements in all directions is shown above.

- Based on the above traffic volumes provided by the applicant, and existing highway traffic counts:
 - The Annual Average Daily Traffic (AADT) on the Mid Western Highway will increase from 3,000 (existing background traffic) to around 3,820 movements per day during construction in Year 2, or an increase of 27% on current traffic volumes.
 - Once construction is complete, AADT will then marginally decrease over the mine operations phase, peaking again in Year 4 at around 3,880 movements or 24% of forecast background traffic at that time (3,120 movements using 1% p.a. growth rate).
 - In terms of peak hourly traffic during construction, based on shift times, approximately 330 vehicle movements would be expected to enter the site before 7am and leave after 6pm on a typical weekday. During the mining operations phase, assuming up to 2 out of 3 personnel work the day shift, approximately 253 vehicle movements would enter the site before 6:30am and leave after 6:30pm.

- Also proposed is a 90km water supply pipeline from Angus Place Colliery at Lidsdale (near Lithgow) to the mine, to meet onsite processing water demand.
- Up to 120 personnel are expected to be involved in construction, divided into five crews each working on multiple fronts along the alignment.
- The applicant proposes to limit traffic associated with the pipeline and pump stations to 30 light vehicles (LV) and 30 heavy vehicles (HV) per day, or up to 24 movements each peak hour daily.
- In addition to the above counts, an unspecified number of water truck movements will occur during the period prior to the pipeline being operational, to meet construction and operational demand for water.
- Although Section 101 of *SEPP (Infrastructure) 2007* requires new developments to preference access to a road other than a classified road, a proposal for a new access (Option 4) directly on the Mid Western Highway as opposed to the use of the existing Dungeon Road is proposed.

Roads and Maritime provides the following recommended conditions for inclusion in any consent issued by the Department of Planning, Industry & Environment in relation to SSD 9505:

- Roads and Maritime does not support the proposal to commence the first phase of construction via the existing Dungeon Road access. The new site access junction at the proposed (Option 4) location on the Mid Western Highway is to be designed and constructed to accommodate the largest vehicle accessing the intersection and include appropriate provision for access via emergency services. This access is to be constructed prior to any construction works commencing.
- Prior to the commencement of any construction work, a Channelised Right Turn Treatment (CHR) in accordance with Figure 7.7 Part 4A of *Austroads Guide to Road Design* (copy enclosed) and relevant Roads and Maritime supplements is to be provided at the proposed intersection with the Mid Western Highway. The intersection works are to be designed and constructed for a 100km/h posted speed zone and be able to accommodate the largest vehicle accessing the intersection.
- Prior to commencement of any construction work, an Auxiliary Left turn treatment (AUL) as shown in Figure 8.4 Part 4A of *Austroads Guide to Road Design* (copy enclosed), and relevant Roads and Maritime supplements is to be provided at the proposed intersection with the Mid Western Highway. The intersection works are to be designed and constructed for a 100km/h posted speed zone and be able to accommodate the largest vehicle accessing the intersection.
- Safe Intersection Sight Distance (SISD) requirements as outlined in the *Austroads Guide to Road Design* Part 4A and relevant Roads and Maritime supplements is to be provided and maintained in both directions at the intersection with the Mid Western Highway. For a 100km/h posted speed zone the minimum SISD is 262 metres.
- Roads and Maritime support the initial first kilometre of the site access road from the Mid-Western Highway to be sealed with bitumen.
- The Walkom Road intersection and associated turning lanes will need to be accommodated for in the detailed design of the aforementioned treatments. Further discussion with Roads and Maritime and Council will need to be undertaken in this regard.
- Details of closure of all existing accesses between properties that comprise the mine site and the Controlled Access Road (CAR) segment of highway are to be provided to Roads and Maritime prior to construction commencing. This is a condition of Roads and Maritime consenting to the new access to the CAR under Section 70 of the *Roads Act 1993*.

- If supported by Council, the procedure for permanently closing part of Dungeon Road is set out in Part 4 Division 3 of the *Roads Act 1993*, and Roads and Maritime is a notifiable authority.
- To negate future issues with access rights (e.g. in relation to the Controlled Access Road) and servicing requirements, all lots that make up the mine site are required to be consolidated before the processing facility commences operation.
- Roads and Maritime advises the proponent that the Mid Western Highway is currently the subject of a road safety improvement investigation project. The scope of works resulting from this investigation is yet to be determined however the proposed site access may fall within the project scope and further detailed discussion will need to be undertaken between Roads and Maritime and the proponent regarding this matter. Features that may need to be incorporated and possibly undertaken as part of any required upgrade to the proposed access include:
 - Wide centre line treatments.
 - Continuous edge flexible barrier.
 - Three metre wide sealed shoulders in front of where barriers are located and
 - Where there is an adjacent through travel lane, two metre allowable shoulder adjacent to turning lanes.
 - Audio tactile line marking.
- Roads and Maritime supports the provision of safety features including truck advance warning signage (sign W5-22 Size B) with distance plates under (W8-5 Size B) and vehicle or fog-activated wig wag lights on the highway approaches at least 300m from the site access intersection, with fail-safe operation. Roads and Maritime will work directly with the proponent as to the required specifications for installation.
- Details of ancillary works are to be provided, including relocation of services, vegetation removal, transitions for drainage, batter slopes and any required road reserve acquisition.
- Any works impacting a rail line or rail corridor require the relevant consent prior to works commencing.
- The Mid Western Highway is a State road and the Developer will be required to undertake private financing and construction of works on a road in which Roads and Maritime has a statutory interest. A formal agreement in the form of a Works Authorisation Deed (WAD) is required between the Developer and Roads and Maritime prior to works commencing.
- A Road Occupancy Licence (ROL) is required prior to any works commencing within three (3) metres of the travel lanes of a State classified road, or work that has potential to impact traffic flow such as the use of traffic control devices or signage. A Traffic Control Plan (TCP) is to be submitted as part of the ROL application. This is to be applied to include the proposed pipeline construction works as well as all other proposed works.
- It is noted that any future proposal for electricity supply lines in connection with the development will require the concurrence of Roads and Maritime where they cross classified road reserves.
- Details on any proposed visual screening and or landscape plans and potential for impacts with the classified road are to be submitted and approved prior to being undertaken.

- Where the pipe alignment is proposed along or crossing a classified road reserve:
 - The pipeline is to be located as far from the carriageway as practicable to allow for future widening or upgrades. Crossings are to be made at or near 90 degrees to the road centreline, and at least 30 metres from road intersections, unless otherwise approved.
 - For State roads, crossings are to be under bored a minimum of 1.2 metres with an outer encasing pipe. Design details are to be submitted and approved to the satisfaction of Roads and Maritime and relevant Council prior to any works commencing.
 - For Regional classified roads, details of bored or trenched crossings are to be submitted and approved to the satisfaction of Roads and Maritime and relevant Council prior to any works commencing.
 - Further detail is requested regarding any proposed pipeline crossings with *Controlled Access Roads*, under *section 49 of the Roads Act 1993*.
- The consent holder shall implement a Traffic Management Plan (TMP), including a Construction Traffic Management Plan (CTMP), including a Driver Code of Conduct. Prior to commencement, the TMP is to be circulated for review and incorporate any requirements of Councils for their affected local roads and Roads and Maritime Services for affected classified roads. The plan(s) shall include (but not be limited to):
 - A commitment to the use of mine-operated buses and car-pooling during both construction and operation.
 - An enforceable policy for staff and contractors to use Millthorpe Road (Blayney – Shadforth, a State classified road) in preference to Guyong Road where the journey is not unreasonably lengthened, as outlined in the approved Environmental Impact Statement (EIS).
 - Heavy vehicle transport procedures in compliance with the requirements of the National Heavy Vehicle Regulator (NHVR) and codes for transport of hazardous materials.
 - Details of origin, destination, quantity, size and frequency of heavy vehicles movements including water cart movements and Over Size Over Mass (OSOM) truck loads associated with the development and any special measures required accommodating these. This is to include the pipeline crossing as well as mine construction.
 - Any OSOM will be the subject of a separate approval and relevant permits by the relevant consent authority(s).
 - Fill generated by the pipeline construction is noted as requiring transportation offsite in some instances. This should be further quantified and routes identified in the CTMP.
 - Potential for queuing was further noted, in particular pertaining to concrete pours. Roads and Maritime supports as part of the CTMP that mitigating measures to negate any impacts of queuing, in particular on public roads and where any rail crossings are located is to be further addressed.
 - Restriction of traffic associated with construction of the pipeline to operate on public roads during daylight hours only.
 - Procedures for addressing concerns raised by the community on project-related matters.

- Toolbox meetings to facilitate continuous improvement initiatives and incident awareness.
- Truckloads are to be covered at all times when being transported, to minimise dust and loss of material onto roads which may form a traffic hazard.
- Scheduling of heavy vehicle movements to occur outside of commuter peak periods, outside of school bus pick up and drop off locations is to be avoided, to avoid local events, and to minimise convoy or platoon lengths. Noting there are currently a number of school buses operating within proposed project locations consultation should be undertaken so as to avoid interactions.
- Procedures for heavy vehicle movements to mitigate the effects of local climatic conditions during all phases of the project (e.g. dust, heavy fog, wet weather, ice or snow).
- Measures to ensure responsible fatigue management and discourage driving under the influence of alcohol and/or drugs, dangers of mobile phone use, importance of driving to the conditions, and adherence to posted speed limits.

It would be appreciated if a copy of the determination for SSD 9505 is forwarded to Roads and Maritime at the same time as it is sent to the proponent. Should you wish to discuss this matter further, please contact Ainsley Bruem, A/Manager Land Use Assessments on (02) 6861 1449.

Yours faithfully



Holly Davies
A/Senior Manager Regional Customer Services
Western Region