

CR2020/003646
CR2020/003647
SF2014/099091
DSN

14 August 2020

Department of Planning, Industry & Environment
Energy and Resource Assessments
GPO Box 39
SYDNEY NSW 2001

Attention: Joe Fittell

**WANGI ROAD (MR217): SSD-5145 - NORTHERN COAL LOGISTICS HUB – MODIFICATION 2
MP10_0080 – MYUNA COLLIERY – MODIFICATION 2**

Transport for NSW (TfNSW) advises that legislation to dissolve Roads and Maritime Services and transfer its assets, rights and liabilities to TfNSW came into effect on 1 December 2019. It is intended that the new structure will enable TfNSW to deliver more integrated TfNSW services across modes and better outcomes to customers and communities across NSW.

For convenience, correspondence, advice or submissions made to or by Roads and Maritime Services prior to its dissolution, are referred to in this letter as having been made to or by 'TfNSW'.

On 20 July 2020 TfNSW accepted the referrals by the Department of Planning, Industry & Environment (DPIE) through the Planning Portal regarding the abovementioned two modification applications (Modification Applications). The DPIE referred the Modification Applications to TfNSW for comment. This letter is a submission in response to these referrals.

TfNSW understands the modification application (SSD-5145) to be for permitting transport of coal by trucks between Myuna Colliery's pit top and Cooranbong Entry Site (CES), blending of this coal at CES, and associated activities. The other modification application (MP10_0080) is for permitting coal from CES to be received, handled and blended at Myuna Colliery's pit top. It is understood that the approved operational life of CES (31 December 2045) and Myuna Colliery (31 December 2032) is not proposed to be modified.

TfNSW understands that the proposed modifications primarily seek:

- Transportation of up to 1.0 Mtpa of coal by road from Myuna Colliery to CES;
- Transportation of up to 0.2 Mtpa of Mandalong coal by road from CES to Myuna Colliery; and
- Construction and operation of a new weighbridge and wheelwash at Myuna Colliery.

The proposed transport route consist of Wangi Point Road (private road) within Myuna Colliery, Wangi Road (State road) and Wilton Road (local road) between Myuna Colliery and the Awaba Colliery surface site, and private haul roads between Awaba Colliery surface site and CES.

The proposal is estimated to generate 31,250 return truck trips (62,500 movements) per annum or approximately 104 return truck trips (208 movements) per active day, assuming the use of 19m articulated trucks, average truck capacity of 32t and 300 active days per annum. This would result in generation of a maximum of 10 return trips (20 movements) per hour between the Myuna Colliery's pit top and CES between 7am and 6pm (Monday to Saturday).

It is noted that the Applicant proposes to restrict truck movements to 5 loaded trucks (10 movements) per hour between 3pm and 4pm (Monday to Friday) to minimise impacts during the afternoon peak hour.

TfNSW Response & Requirements

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

Wangi Road (MR217) is a classified State road and Wilton Road is a local road. Council is the roads authority for both roads and all other public roads in the area, in accordance with Section 7 of the *Roads Act 1993*.

TfNSW has reviewed the referred information, including the Modification Report dated 3 July 2020 and Traffic Impact Assessment (Appendix C) dated 1 July 2020 prepared by EMM Consulting.

It is understood that the Applicant prefers transport of coal by trucks, as proposed, compared to other alternatives such as installing and operating a coal beneficiation plant at Myuna Colliery or on-site blending of coal at Eraring Power Station due to varying reasons.

TfNSW highlights that it does not in-principle support transport of coal by trucks that may be otherwise catered for within the internal operations of the site. Using public roads has potential inherent traffic and road safety impacts which will be required to be addressed.

TfNSW requires that the Applicant demonstrates potential alternatives are not practicable or feasible, to meet its operational and contractual obligations.

Notwithstanding the above comments, the transport route as currently proposed, has the following deficiencies, including but not limited to, which are required to be addressed:

- The TIA proposes no turn treatment is warranted on Wangi Road for left-turning trucks into Wangi Point Road in accordance with Chart (a) of Figure 4.7. TfNSW does not concur with this assessment and highlights that Chart (a), updated version of which is provided in the *Austrroads Guide to Traffic Management Part 6: Intersections, Interchanges and Crossings*

Management (2020), warrants provision of an Auxiliary Left-turn Treatment – Short Turn Lane [AUL(S)] on Wangi Road to cater for future traffic volumes.

TfNSW recommends that an AUL(S) treatment, as a minimum, is provided on Wangi Road which would assist 19m articulated trucks to slow down outside of southbound traffic lane in order to mitigate the risk of crashes.

- The TIA does not assess potential conflict between northbound high-speed traffic on Wangi Road and slow-moving 32t 19m articulated trucks that would have turned right out of Wangi Point Road. TfNSW raise concern that trucks, after making the right-turn, will be unable to reach to the 85th percentile speed of northbound traffic (96 km/h) on Wangi Road without an appropriate turn treatment.

TfNSW recommends that an acceleration and merge lane is provided on Wangi Road for trucks turning right out of Wangi Point Road. This will enable trucks to gain higher speed prior to merging in order to mitigate the risk of crashes.

- The TIA does not assess potential conflict between vehicles turning right at the existing right-turn bay on Wangi Road and trucks entering/exiting Wangi Point Road. TfNSW considers that it is appropriate to ban right-turning movements into Wangi Point Road by replacing the right-turn bay with a concrete median.
- The TIA does not assess the suitability of recently implemented improvements at the Wangi Road / Wilton Road intersection to cater for proposed truck movements. The TIA states that *“These intersection improvements are considered to have been constructed to the required design standard and additional intersection improvements are not required for either the current or proposed levels of turning traffic at this intersection.”*

TfNSW does not concur with this approach and requires that a comprehensive assessment of the Wangi Road / Wilton Road intersection is undertaken to demonstrate that no further improvements are required to cater for the proposed truck movements.

- The TIA does not assess safety risks associated with the lack of street lighting, especially at the Wangi Road / Wangi Point Road intersection, given that the proposal involves transporting coal by trucks outside of daylight hours i.e. up to 6pm (Monday – Saturday). TfNSW requires that a comprehensive assessment of street lighting is conducted on the proposed transport route and necessary upgrades are provided by the Applicant.
- TfNSW requires that a road safety audit of the proposed transport route is conducted by a team of accredited road safety auditors to identify any other risks and mitigation measures.
- TfNSW requires that concept plans for the improvements identified by TfNSW and road safety auditors are provided for review. TfNSW considers the review of this additional information critical prior to supporting the modification applications.

- TfNSW highlights that all works associated with the subject modifications would require to be undertaken at full cost to the developer and at no cost to TfNSW, and to TfNSW's requirements.

Advice to DPIE

TfNSW recommends that the following matters should be considered by the DPIE in assessing this development:

- TfNSW has no proposal that requires any part of the property.
- TfNSW recommends that DPIE or the developer undertake consultation in accordance with the Roads Act Part 8 for the required amendments to the intersections and ensure relevant environmental assessment undertaken as part of DPIE's assessment.
- TfNSW concurrence is required in accordance with Section 138 of the Roads Act (1993) as the roadworks required affect Wangi Road, a classified State road. As such, the works are to be designed in accordance with the current version of Austroads Guide to Road Design (with Roads and Maritime Services supplements) and relevant Australian Standards to the satisfaction of both TfNSW and Lake Macquarie City Council.
- Furthermore, TfNSW highlights that in determining the application under Part 4 of the Environmental Planning & Assessment Act, 1979 it is the consent authority's responsibility to consider the environmental impacts of any road works which are ancillary to the development, such as (inter alia) removal of trees, relocation of utilities, stormwater management, etc. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of development consent. Depending on the level of environmental assessment undertaken to date and the nature of the works, the DPIE may require the developer to undertake further environmental assessment for any ancillary road works.
- Any works on Wangi Road (MR227) will require the developer to enter into a Works Authorisation Deed (WAD) with TfNSW. TfNSW would exercise its powers and functions of the road authority, to undertake road works in accordance with Sections 64, 71, 72 and 73 of the Roads Act, as applicable, for all works under the WAD (Attachment A).

Comment: It is requested that DPIE advise the developer that the Conditions of Consent do not guarantee TfNSW's final consent to the specific road work, traffic control facilities and other structures or works, for which it is responsible, on the road network. TfNSW must provide a final consent for each specific change to the classified (State) road network prior to the commencement of any work.

The WAD process, including acceptance of design documentation and construction, can take time. The developer should be aware of this and allow sufficient lead time within the project development program to accommodate this process. It is therefore suggested that the developer work through this process as soon as possible with the TfNSW.

- All road works under the WAD would be required to be completed prior to any additional truck movements under the modification applications.

Should you require further information please contact Dipen Nathwani, Development Assessment Officer, on 0418 514 166 or by emailing development.hunter@rms.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Peter Marler', with a large circular flourish at the start.

Peter Marler
Manager Land Use Assessment
Hunter Region