



30/09/2021

SF2012/000358 | WST07/00087/10 and 11

The Manager
Resource and Energy Assessments
Department of Planning, Industry and Environment
PO Box 39
SYDNEY NSW 2001

Attention: Philip Nevill

Dear Mr Nevill

**Narrabri Coal, Lot 152 DP816020 & others; Kurrajong Creek Rd, Baan Baa
SSD-10269: Stage 3 Extension, 11 Mtpa production and 540 FTE workforce, and
MP08_0144 MOD-7: Stage 2, bord and pillar mining of longwalls 201 and 202**

Thank you for the additional information received by Transport for NSW (TfNSW) in relation to SSD-10269 and MP08_0144 MOD-7 between 26 July and 14 September 2021.

The proposals have been referred to TfNSW pursuant to Clauses 84 and 104 of *SEPP (Infrastructure) 2007* (ISEPP) and Cl 16 of *SEPP (Mining, Petroleum Production and Extractive Industries) 2007*.

The information submitted in support of the proposal does not provide alterations to the proposed design or operation of the development that would adequately address the safety and efficiency concerns raised by TfNSW in its previous submission dated 25 June 2021.

TfNSW has reviewed the provided information and disagrees with the assessment that there will be no significant impacts on traffic safety and efficiency. Accordingly, at this time TfNSW withholds making final comment and is unable to concur with the extension or modification of the development which will generate additional peak traffic volumes accessing the site via the Kurrajong Creek Road and Kamilaroi Highway intersection.

The following concern in relation to safety and efficiency impacts remain unaddressed:

- Operational staff at the mine site have incrementally increased from some 211 persons (Stage 2 EA, R W Corkery, Nov 2009) since the original Stage 2 MP08_0144 approval, to 370 FTE in the latest approved MOD-5, and 520 FTE currently.

The Stage 3 (SSD-10269) application seeks to extend the mine life from 2031 to 2044, permit during temporary short-term construction and shutdown periods an additional 20 FTE workers on day shift generally 7am to 6pm.

The Stage 2 (MP08_0144) MOD-7 application seeks 30 additional FTE workers per shift to carry out bord and pillar mining (as opposed to current longwall mining), with day shift 6:30am to 6:30pm and night shift 6:30pm to 6:30am.

The increase in staff numbers from Stage 2 MP08_0144 approval to the current operation has resulted in additional traffic volumes accessing the site via the Kurrajong Creek Road and Kamilaroi Highway intersection.

The Stage 3 Extension (SSD-10269) application has documented, under existing conditions, vehicle queues that occur for 5 to 10 minutes, back from the Kurrajong Creek Road railway level crossing (LX534) and into the Kamilaroi Highway (State classified HW29) when workers arriving for shift changes coincide with a coal train arriving at LX534.

TfNSW concurs with the applicant's assessment (TTPP, Jul 2021) that basic warrants are met for a northbound Basic Left (BAL) turn treatment and a southbound Channelised Right Short (CHR/S) turn treatment, however, noting Austroads AGRD04A designs provides minimum deceleration lengths and no storage (except the provision for space for one design vehicle length for the turning vehicle).

It is also noted that the lanes exceed the length of warrant requirements apparently to provide vehicle storage in addition to the deceleration purpose of the lane due to the potential for extended queuing at the location based on the original project approvals which envisaged both shorter train delays and lower peak traffic volumes than the current circumstance.

It is critical that vehicles exiting the high-speed highway lanes have space to decelerate safely in accordance with the warrant required lane lengths. TfNSW is not satisfied that the existing development is resulting in safe outcomes at the intersection with respect due to the deceleration space of the lanes being exhausted by queuing vehicles. The proposed modification includes increasing staff numbers and will further exacerbate the danger created by queuing vehicles at the intersection.

The site and facilities layout, the operation of the development and/or the potential for modification of the mine access, including treatments at the intersection of Kurrajong Creek Road and Kamilaroi Highway need to be reconsidered and amended to adequately address these concerns.

Please confirm with TfNSW that the SSD will not be determined until TfNSW has had an opportunity to undertake an assessment following amendments to the development designed to address the matters raised above.

TfNSW welcomes the opportunity to discuss further. If you have any further queries or wish to discuss this matter further, please contact Bevan Crofts, Case Officer by email, development.western@transport.nsw.gov.au or phone (02) 6861 1530.

Yours faithfully



Howard Orr
Team Leader
Development Services West

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