



August 24 2020

Department of Planning and Environment

Dear Director,

Re: Myuna Coal Mine – Modification 2

Application number: MP 10_0080-Mod-2

Thank you for the opportunity to make this submission regarding Centennial Coal's planned modification to its existing operational consent.

I am the current State Member for Lake Macquarie in the NSW Legislative Assembly and have held that role for the past 13 years. I was an elected member of Lake Macquarie City Council for 21 years, serving as Mayor for eight years.

Introduction

Centennial Coal is a significant employer locally and important to our local economy. I believe this will likely remain so for the considerable future. The nature of their operation will no doubt need to change from time to time to accommodate changing markets and the capacity to supply desirable coal. I am not opposed to what I refer to as 'traditional mining', that being underground mining.

I am however strongly opposed to this proposed modification which could see 62,400 coal truck movements a year on public roads and in doing so reopening a dangerous intersection to allow those trucks access from Myuna Colliery to Wangi Road.

This will place existing road traffic at increased risk, impact on road quality and reduce local amenity. An alternative to road haulage exists. It has for years been used to supply coal safely to Eraring power station and has the capacity to manage the additional demand. That alternative is the existing conveyor system between the colliery and the power station; and in light of that alternative, this proposed modification should be refused.

The proposal

In its application, Centennial says its Myuna mine is no longer providing the high quality coal that it's contracted to sell Origin Energy to operate Eraring Power Station. I accept that is the case. To solve that problem, it wants to blend its low-quality Myuna coal with the higher-quality coal from nearby Mandalong Mine.

In order to do this, it says it needs to send one million tonnes a year by truck via public local roads. This equates to 62,400 truck movements a year, 10 hours a day, six days a week. That's a fully-laden coal truck making a return trip every six minutes.

The impact of 62,400 trucks on local roads

On page 44 of Centennial's application, it says that based on average truck capacity of 32 tonnes per truck and 300 'active' working days per year, moving one million tonnes of coal a year equates to 208 truck movements per day, or 20 truck movements per hour of operation.

On the same page, Centennial says "safety concerns are only minor and do not generally warrant further road safety upgrades along the assessed road corridor".

As a regular user of this road I do have significant concerns for road safety and strongly disagree with their statement.

Wangi Road is part of a busy State arterial route designated as B53. The area assessed carries more than 7000 vehicles daily.

With the exception of a 1.5km overtaking lane (uphill) in the assessed area, it is a one-lane road in each direction. It is not credible to suggest that adding 208 coal trucks every day is not going to have a significant impact on traffic and road surfaces.

Almost three decades ago, coal trucks were stopped from using Wangi Road because of regular accidents and impact on road quality. The community, along with government agencies of the time, fought hard to have those trucks removed. Mines in the area, as well as the Eraring Power Station which was in Government hands at the time, were given approval to establish a network of private haul roads which didn't impact on local roads or traffic. They also established an extensive conveyor network to move coal around. Both remain in place.

I do not see any reason why Centennial could not negotiate to use the existing conveyor system which passes under Wangi Rd, to deliver the coal to the power station site and then use trucks to carry it to its desired mixing location along the haul roads.

On page 5 of the application, Centennial says it discounted the conveyor option because it "didn't align with Origin's preferred coal delivery strategy" and "would reduce on-site stockpile capacity at Eraring". My own investigations and discussions with Origin and Centennial indicate that the question had not been put to Origin Energy. I believe that Centennial Coal's reference to Origin's preferred delivery strategy was not based on a clear proposal to Origin or indeed a refusal from Origin Energy.

The assessed traffic area also includes five intersections which could generally be regarded as dangerous and are the scene of numerous accidents, yet Centennial says no work is needed to upgrade any of them.

The State Government has spent millions of dollars upgrading the safety of these intersections over the past decade. The Summerhill Drive-Wangi Road intersection is placed on the top of a crest in a 90kmh zone yet visibility for those pulling out of Summerhill is not ideal.

Further north, the Donnelly Rd-Wangi Rd intersection and the Buttaba Hills Rd-Wangi Rd intersection are located reasonably close together at the top of the hill. While safety has been improved, numerous accidents still occur there due in part to poor visibility of oncoming traffic, speed, and the fact that two lanes merge in that vicinity.

Further north, the State and Federal governments spent a combined \$4m building a roundabout at the Dorrington Rd-Wangi Rd intersection at Rathmines in 2010. While this improved safety and reduced crash numbers, it was built with a north-bound slip lane which, while appropriate in most circumstances, is more likely to cause merging anxiety and conflicts when the approaching through vehicle is a truck carrying 30 tonnes of coal.

Slightly further north again, Lake Macquarie Council and the State spent several million dollars recently upgrading the Wilton Rd-Wangi Rd intersection. This is already a dangerous intersection where garbage trucks heading to and from Awaba Waste Management Facility have to turn into traffic doing 80kmh. Adding a coal truck every three minutes to that intersection will I believe exacerbate safety concerns there.

I cannot support any plan that will unnecessarily add risk to everyone using those roads, including the truck drivers.

The intersection of Wangi Point Road and Wangi Road

In its application, Centennial is proposing to reopen the now-disused intersection of Wangi Point Road and Wangi Road. This will provide access to and from the Myuna colliery for the 62,400 annual truck movements it proposes.

On page 46 of its application it says "no widening or improvement works are required on Wangi Road to facilitate the efficient entry/exit of heavy vehicles" at the location.

There may be a technical argument that this is the case, however it will not be the real world case as judged by other road users. That intersection was closed decades ago because it was the scene of numerous accidents which I understand resulted in some fatalities.

Traffic coming from the south at 90kmh on Wangi Road head down a hill towards that intersection. There is a bend that veers to the left. Any driver coming around that bend cannot even see the intersection until they are 150m from it. Likewise, no truck driver pulling out of the intersection will see the oncoming traffic until it's just 150m away. We'll have cars and trucks and school buses coming around a bend at 90kmh to be suddenly confronted by a fully-laden coal truck pulling out across two lanes of traffic at very low speed. In anyone's language, that will create disastrous consequences.

It must be noted that there is only one turning lane at the intersection, but it's a right-turn lane into Wangi Point Road from the south. Centennial's trucks will be leaving and entering from the opposite direction where no turning or merge lanes exist!

Similarly, trucks returning to the colliery will be coming down a steep hill in a 90kmh zone and then heading up the mild incline before slowing to turn into Wangi Point Road. Again, there is no existing turning lane and none proposed by Centennial.

It is extremely difficult to understand how Centennial reached the conclusion that this would be safe!

That intersection was closed decades ago for a reason – it claimed lives. It cannot be allowed to reopen, least of all for the purposes proposed by Centennial.

Petition

Centennial's application prompted dozens of inquiries to my office. I successfully sought Ministerial intervention to increase the amount of time people had to make their submissions to Planning NSW, and I am grateful to the Minister and Planning NSW for that extension.

I also started a petition, controlled by the NSW Parliament, which allowed people to register their concern. The petition calls for Centennial's application to be rejected in full and attracted the names of more than 1100 local people in little more than a week. That number will almost certainly grow as the planning process continues.

Conclusion

I am very strongly of the belief that this application should be rejected.

It is a dangerous proposal that will almost certainly cost lives on the local roads Centennial intends to use. I also believe it will diminish Centennial's social licence to operate in the area.

There is an alternative available to Centennial and I don't believe it's been properly investigated. This is the use of the existing conveyor system.

Centennial should also be encouraged to work more closely with Origin Energy with a view to finding an alternative location for mixing that doesn't impede the power station's current operations or stockpiles.

I acknowledge the difficulties faced by Centennial in these challenging times, but we cannot allow an application such as this to go ahead, regardless of the conditions Planning NSW are being requested to consider.

I again thank you for the opportunity to make this submission. I make myself available to you at any stage to discuss the matter further.

Yours sincerely,



Greg Piper
Member for Lake Macquarie