

NOTICE OF OBJECTION

Myuna Coal Mine Modification 2 to Project Approval MP 10_0080

Northern Coal Logistics Modification 2 to Project Approval SSD 5145

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Introduction

With my wife Vicki Gorman I am co-owner of a residential property at 94 Alexander Parade, Arcadia Vale NSW 2283. I regularly drive the route along Wilton Road and Wangi Road to access this property.

I object to the proposed Modification 2 to the Myuna Coal Mine Project Approval MP 10_0080 and the complementary Northern Coal Logistics Modification 2 to Project Approval SSD 5145 for the reasons outlined as per the following. The objection is particularly directed towards the routing and proposed number 32t capacity heavy vehicle coal truck journeys along Wangi Road and Wilton Road.

I have no objection to proposals to transfer coal between Myuna Pit Top and CES for the purposes of blending coal to a desired quality for supply to the Eraring Power Station. However I believe this transfer needs to be achieved essentially within existing mining lease areas, using infrastructure – preferably overland conveyor – installed at the Proponents own expense.

Grounds for Objection

1. The nature and volume of proposed truck traffic on Wangi Road and Wilton Road will provide a safety hazard to other road users, with potential for serious injury or death from vehicle accidents. Reasons and observations as follows:
 - a) 32t semi trailer trucks are likely to travel at speeds of 60km/hr or less on uphill sections of Wangi Road and Wilton Road, where other light vehicle traffic is likely to be travelling at close to the posted speed limits of 90km/hr and 80km/hr on those roads. This will add complexity for all drivers negotiating the various intersections along the proposed route.

- b) As one example, a right hand turn out of Donnelly Road onto Wangi Road entails a driver making a complex traffic assessment, requiring them to:
- i. identify vehicles cresting the hill to the right, and emerging into view from a sweeping left hand bend
 - ii. assess their speed
 - iii. assess whether they will pass in front (continuing south on Wangi Road) or are indicating they propose to turn left into Donnelly Road (in which case it would be safe to commence the turn and cross in front of them)
 - iv. assess if indicating a left turn, the vehicle is actually slowing to make the turn
 - v. identify vehicles approaching up the hill from the left, emerging into view from a sweeping left hand bend
 - vi. assess their speed
 - vii. identify whether they are in the left hand climbing lane or the right hand climbing lane, or whether in fact they are in the process of changing from the left hand to the right hand lane (in which case they may well be accelerating)
 - viii. identify whether a vehicle in the right hand climbing lane is continuing north along Wangi Road, or in fact slowing down to turn right into Donnelly Road (in which case the driver turning right from Donnelly Road would need to delay their turn out).

Making the turn safely requires multiple simultaneous good judgements of the speeds and intentions of vehicles from both directions, together with a decision as to how the fairly short acceleration lane will be used (i.e. to pause or accelerate promptly).

To add slow moving traffic to this mix – i.e. 32t semi trailer trucks heading north, travelling at 60km/hr or less in the left hand climbing lane and very likely pushing more light vehicles into the right hand climbing lane, and very likely resulting in them accelerating in the process, will add significant further complexity to driver decision making and has a strong potential to cause more accidents at this intersection – potentially with a severe or catastrophic result (i.e. severe injury or death).

- c) Drivers seeking to make a right hand turn out of Buttaba Hills Road onto Wangi Road are likely to face similar complexities and increased hazard from this proposal – it is noted however that the writer does not have direct experience of regularly using this intersection.
- d) Trucks travelling east on Wilton Road, making a right hand turn onto Wangi Road to return to Myuna Pit Top descend down a reasonably steep decline to a Stop Sign before making the right hand turn. Again this is a reasonably complex intersection and any brake failure on loaded trucks making the return trip, or loss of concentration by the driver, seeing the truck travel beyond the Stop line before coming to a stop, would have the potential to cause a collision with serious injury potential for light vehicle occupants.

2. The Traffic Impact Assessment incorporated in the Modification Proposal does not address potential impacts on driver behaviour. For example:
- a) The introduction of heavy truck traffic in the volume proposed is likely to provide the incentive for other drivers to engage in riskier behaviours, whether through frustration or innocently conceived intention to “beat the trucks” into sections of road where they would be compelled to travel behind them at speeds significantly less than the posted speed limit (eg Wilton Road which is double lined – no overtaking – has no passing lanes and upon which heavy vehicles have been observed by the writer to travel at typically 60 – 65 km/hr along this undulating, curved section of road).
 - b) 32t heavy coal haulage trucks travelling north on Wangi Road, down the hill past the Dorrington Road intersection will be decelerating and moving to the left into the left turning lane. Light vehicle drivers coming from behind, and also intending to turn left into Wilton Road, may be tempted to accelerate to get in front of a coal truck to avoid a constrained slow trip (“locked in” behind the truck) along Wilton Road. This is also likely to cause accidents with potentially serious injuries resulting.
 - c) It is contended that the Traffic Impact Assessment is seriously flawed in that it considers only a numerical analysis based on vehicle number averages and queuing modelling, where this modelling considers current traffic and the proposed new heavy vehicle coal transport traffic as being single vehicle units of homogeneous size and characteristics.
 - i. There is no consideration of impacts on potential or likely driver behavioural responses.
 - ii. There is no consideration of the likely seriousness of any accidents that may occur, due to the huge disparity of vehicle size and mass (were a collision to occur between a light vehicle and a 32t laden coal truck).
 - iii. Where the Traffic Impact Study finds that the rate of accidents is currently low, and that any likely increase is likely to be small, it omits to consider that the potential seriousness of any injury resulting from that small increase in accident rate is likely to be vastly greater (because of the great disparity in size and mass of the incrementally added traffic).
 - iv. There appears to be no consultation with NSW Police in respect of road safety impact of the proposal on Wangi Road and Wilton Road.

In summary, the Traffic Impact Study concludes that increases in individual traffic movements and queuing/delay times at intersections will be minor and therefore the proposal is acceptable. It neglects to consider that potential for serious or catastrophic injury or fatality events will most likely be significantly increased.

3. The nature and volume of proposed truck traffic on Wangi Road and Wilton Road will significantly reduce amenity of the area for residents and others, through heavier traffic, longer travel times, deteriorated roads, increased noise, increased dust and vehicle emissions, the latter two with potentially direct health impacts. This is a subjective, qualitative view held by the writer and which is contended will likely be felt by a significant number of other residents.

4. Anecdotal evidence from residents of Singleton where coal trucks previously used public roads, but have since been removed, was that there was a very significant and ongoing impact in that coal dust and slurry impacted road sides and residents cars, obstructing vision, obscuring street signs, lane marking reflectors and the like. This had a serious road safety impact as well as imposing high cleaning/maintenance costs on local authorities. These are views expressed to the writer by residents of the Singleton area from their own direct experience.
5. It does not seem credible that the loading and unloading of trucks at Myuna Pit Top and CES, to 1.2mtpa (more than 1/3 of the currently approved volume from Myuna Colliery) will not inevitably generate more airborne coal dust than the present conveyor based transport system, in turn potentially impacting the health of nearby residents, together with the causing of nuisance and potentially damaging fallout on nearby residents, houses, vehicles etc. Utilisation of the existing overland conveyor to Eraring, and potentially extended on to CES appears, on the face of it, to be a vastly superior solution.
6. The nature and volume of proposed truck traffic on Wangi Road and Wilton Road will very likely cause accelerated deterioration, imposing maintenance costs on Transport for NSW in respect of Wangi Road and Lake Macquarie City in respect of Wilton Road, with potentially an increased burden of cost ultimately passed through to ratepayers in the case of the latter.
7. The reason and justification for the proposed modification to the Project Approval MP 10_0080 is not clearly and credibly explained, allowing the possibility that the proposed modification may be used for purposes outside the scope and intention of the original MP 10_0080 Project Approval (adoption of this proposal would appear to enable trucking of coal to Newstan site for export by rail for example). Further:
 - a) To claim that this proposal is required to protect employment at Myuna Colliery seems disingenuous when it has been well enough documented that coal fired power stations such as Eraring are running at low capacity (for an example, refer to article "Nation's top coal plant cuts output amid COVID-19, renewables pressure", Sydney Morning Herald, 24/06/20 – copy attached). Myuna Colliery (from information in the Proposal) supplies all its coal output to Eraring Power Station, and it might be concluded, consequentially, that its output, level of business and therefore, presumably, employment, declines in sync with Eraring's output. Thus the writer's claim that it seems disingenuous to link a failure to adopt this proposal to a potential loss of employment at Myuna Colliery.
 - b) Commercial pressure from Origin Energy (operator of the Eraring Power Station) on Myuna Colliery to delivery higher quality coal may be understandable and a predictable commercial response, but to claim that there has been some sudden (presumably unforeseen) deterioration in ROM coal quality ex Myuna Colliery, demanding a sudden and immediate response (in the context of decades long planned mine life) lacks credibility – at least to this writer.
8. It is contended by this writer that the proposed means of transporting a total of 1.2m tonnes of coal pa by truck between Myuna Pit Top and CES will have an unjustifiable environmental impact as compared with a direct overland conveyor alternative.
 - a) One basis for this judgement is that the travel distance of trucks appears to be approximately 12km each way (measured approximately from Google Earth), whereas the direct conveyor route is estimated at 6.5km (also approximated from

Google Earth), of which an estimated 4.5km appears to already exist (from Myuna Pit Top to Eraring).

- On the face of it, the current 3mtpa coal delivery conveyor from Myuna to Eraring may need to be extended from Eraring to CES – estimated as an additional 2km).
- Essentially a 2km conveyor extension to save a potentially huge negative community impact from proposed trucking solution.

It is suggested that the Proponent, rather than be permitted to use public infrastructure assets at essentially zero cost, with great community harm, to achieve its own commercial goals, should be required to invest funds in its own infrastructure – eg. an extension and appropriate modification to the overland conveyor systems mostly already in place.



Michael Trask

Attachment: Newspaper article “Nation’s top coal plant cuts output amid COVID-19, renewables pressure”, Sydney Morning Herald, 24/06/20

The Sydney Morning Herald

BUSINESS COMPANIES ENERGY

Nation's top coal plant cuts output amid COVID-19, renewables pressure

By Nick Toscano

June 24, 2020 – 7.00pm



Australia's largest coal-fired power plant has sharply reduced its daytime output in response to the impact of coronavirus gutting the nation's electricity demand and renewable energy pushing down wholesale prices.

As Australians consume less electricity during coronavirus lockdowns, lower demand coupled with an influx of cheap renewable energy is driving daytime prices to the point where it's no longer economically feasible to run coal generators. Origin Energy's Eraring plant on the shores of New South Wales' Lake Macquarie has been running its four 700-megawatt generation units as low as 200 megawatts amid falling energy demand and prices.



Origin's Eraring power plant in NSW is the largest coal-fired generator in Australia. NICK MOIR

Greg Jarvis, Origin's head of energy supply and operations, said the changes to the power station's daytime generation would cause its coal-fired power output to

drop by up to 3 terawatt-hours for the 2020 financial year – a drop of nearly 20 per cent from the previous year.

"We are running our plant differently in the middle of the day because that reduced demand really highlighted the downward pressure on [daytime] prices because of renewable energy," Mr Jarvis said at the annual Credit Suisse Australian energy conference.

"Eraring is pretty flexible. When we see prices in the mid-\$30s or lower, we tend to save the coal and stockpile it or just delay deliveries from the mine and buy energy for our customers from the pool at those prices."

Across the nation, lockdowns aimed at arresting the advance of the coronavirus had led to a 10 per cent drop in electricity demand, Mr Jarvis said, the bulk of which was driven by big businesses' consumption falling 10-15 per cent and small-to-mid-size business consumption falling 15-20 per cent. Residential power use increased as more people worked from home.

Experts and analysts say the surge of renewable energy coming into the grid – which now accounts for more than 20 per cent of the nation's power and is on track to increase sharply in the coming years – was hollowing out daytime spot prices, piling ever-growing pressure on coal-fired generators and could hasten the retirement of some plants. The Yallourn plant in Victoria's Latrobe Valley has been identified as one of the most likely to face the risk of an earlier-than-expected closure due to its old age and lack of ability to quickly ramp up and down.

Origin's Eraring power plant, however, "can flex up and down very quickly", and therefore was able to ramp up when needed most during the morning and afternoon peaks and swiftly respond to changes in the market, Origin said.

"I am absolutely looking at how we can run Eraring differently going forward, making it more flexible or running the units differently and putting batteries on," Mr Jarvis said on Wednesday. "But quite frankly, as you get more renewables and they are cheap, [coal] is a very expensive technology to run because maintenance costs a lot of money."

AGL, the nation's largest power supplier, said flexibility would become increasingly important in order to handle the market volatility expected in the coming years including through the greater adoption of battery-storage technology.

"We're investing in flexibility, storage because we see price volatility – whether it be spot market intra-hour volatility or generally longer-term volatility in prices – we see that increasing," AGL general manager of trading Simon Sarafian said. "And the way to capture that is to have a diverse portfolio and many different options of fuels."



Nick Toscano



Business reporter for The Age and Sydney Morning Herald.