

# Hunter Community Environment Centre.



167 Parry St Hamilton East 2303, NSW

[www.hcec.org.au](http://www.hcec.org.au)

[coordinator@hcec.org.au](mailto:coordinator@hcec.org.au)

August 26 2020

## SUBMISSION

### **Modification 2 Myuna MOD 2**

- Transport of up to 1.0 Mtpa of ROM coal by road from Myuna Colliery to Cooranbong Entry Site (CES).
- Receipt of up to 0.2 Mtpa of Mandalong ROM coal by road from the CES.
- Construction and use of a weighbridge.

### **Northern Coal Logistics Modification**

- Dispatch of up to 1.0 Mtpa of ROM coal by truck from Cooranbong
- Entry site (CES) to Myuna Colliery.
- Receive up to 0.2 Mtpa of ROM coal from Myuna Colliery.
- Increase the throughput of the Middlings Stockpile from 0.5 up to 1.5 Mtpa.

The Hunter Community Environment Centre (HCEC) was established in 2004 in recognition of the value of our unique landscape and bioregion. Together with 3,000 supporters and affiliates, we work with our community to protect biological diversity and special places and enhance the quality of life in the Hunter region.

HCEC objects to the **Modification 2 Myuna MOD 2** and the **Northern Coal Logistics Modification** on the basis of increased risk to the public, particularly users of the Wangi and Wilton Roads, and to the further expansion of industrial activity in an area with densely populated suburbs and sensitive ecological populations.

The Lake Macquarie and Central Coast regions bear the current and cumulative impacts of approximately five decades of coal-mining and burning, including water contamination in Lake Macquarie and surrounding systems, air and noise pollution and traffic congestion.

The proximity of the Lake Macquarie coal industry to suburban populations and townships in the region mean that additional measures to contain the industrial footprint and limit safety risks must be adopted.

Any increase in coal-truck movements on public roads inevitably presents an increased risk to the safety of local residents and road-users, a concern which has been

Calls for this proposal to be ruled-out in the interest of safety have been made by community groups, local residents and Lake Macquarie's Member of Parliament, Greg Piper MP on social media channels and in media coverage. Greg Piper launched a petition against the proposal on August 13, which has attracted over 1000 signatures to date.

Conversation and comments capture the public concern and opposition to the proposal to deploy 60, 000+ additional coal trucks onto 90km/hr public roads in Lake Macquarie.

### **Increased risks and impacts from additional coal-trucks on public roads**

The proposal to haul 1.2 million tonnes of coal per year via Wangi Road and Wilton Road is the highest-risk option for the general public and local residents, jeopardising driver safety, adding burden to public infrastructure and impeding access to an essential facility located on Wilton Road.

1.2 million tonnes would be the largest quantity of coal to be transported on public roads per year from mines in the region, with Chain Valley Colliery approved to transport a total of 840, 000 tonnes per year.<sup>1</sup>

Chain Valley Colliery supply the Vales Point power station via an overland conveyor, with trucks primarily used to transport coal 50km away to Newcastle's export terminals.

The number of coal trucks on Ruttley's road remain a concern to residents, with upgrades to private haul roads and underground conveyors being constructed after input and negotiations with local residents who expressed concerns for road safety at the planning stage.<sup>2</sup>

#### **1. Road safety and increased risk of crashes leading to injury or death**

Australia's states and territories place a high priority on research and implementation of improvements to road-safety, manifest in the NSW Governments Towards Zero<sup>3</sup> initiative and regional campaigns aimed at reducing road-related fatalities.

Transport NSW Centre for Road Safety data shows that between 2014-2018 there were 2,227 casualties from crashes in the Lake Macquarie LGA.

The Centre for Road Safety website shows that between 2014-2018 Wangi Road experienced 4 crashes resulting in injury involving heavy vehicles, with 2 taking place at the Wangi and Awaba Road intersection. No crashes involving heavy vehicles are shown for Wilton Road during the same period.

Ruttleys Road in the Central Coast LGA is currently utilised to transport coal via trucks from Chain Valley Colliery to Newcastle's coal export facility via the Pacific Highway, experienced 1 serious injury and 1 fatality from crashes involving heavy vehicles between 2014-2018.

The Traffic Impact Assessment in the proposal downplays the impact of the additional truck movements by citing a less than 7% overall increase in traffic, any increase in heavy vehicles on roads will see an increased likelihood of incidents leading to fatalities or injury.

Monash University Accident Research Centre's study into the number of light vehicle driver fatalities and serious injuries resulting from light and heavy vehicle collisions found "broad correspondence between growth in heavy vehicle travel and the number of heavy vehicle crashes" with passenger vehicles.<sup>4</sup>

Statistics from the *Department of Infrastructure, Regional Development and Local Government* conclude that heavy vehicle crashes are responsible for as much as 20% of the total road-related deaths.<sup>5</sup>, yet less than 3 per cent of all registered motor vehicles in NSW are heavy trucks.

---

<sup>1</sup> Chain Valley Colliery and Mannering Colliery MOP 2018-2020

<sup>2</sup> [Lake Coal wants to build underground conveyor](#), Newcastle Herald, 2014

<sup>3</sup> <https://towardszero.nsw.gov.au/>

<sup>4</sup> *The influence of trends in heavy vehicle travel on road trauma in the light vehicle fleet*, Monash University Accident Research Centre, 2007

<sup>5</sup> Australian Government: Fatal Heavy Crashes Australia Quarterly Bulletin (April-June), Department of Infrastructure, Regional Development and Local Government, 2009

The 2017 Centre for Road Safety *Heavy Vehicles Trauma report* states “heavy vehicles are clearly over-represented in fatality and serious road trauma in NSW” and that “over half of fatalities and serious injuries are occupants of other light vehicles and 22 per cent of fatalities are pedestrians or motorcyclists.”<sup>6</sup>

Section 4.5 of the Modification Proposal Impact Assessment refers to a 19-meter articulated vehicle which undertook a swept path assessment on Wangi Road.

The Australian Government’s *Fatal heavy vehicle crashes Australia quarterly bulletin* shows that articulated trucks are the leading cause of road fatalities involving heavy trucks, leading to more deaths than crashes involving heavy rigid trucks or buses.<sup>7</sup>

## 2. Degradation of public infrastructure

The correlation between weight from heavy vehicles on roads and accelerated road surface degradation is well-established.

One report by the US Accounting Office completed in 1979 cites “tractor-trailers” or trucks with axels as having an impact equivalent to 9,600 regular vehicles<sup>8</sup> with more recent research and technological solutions supporting the assertion.<sup>9</sup>

Articulated “tractor-trailer” vehicles with an axle are assumed to be the model proposed to be deployed, with the proposal referring to the average carrying capacity of trucks as 32 tonnes, of which 200 would be deployed each day for 300 days per year.

This equates to 1,920,000 million tonnes per annum of additional weight on Wilton and Wangi Roads.

There have been numerous studies carried out in the US aiming to quantify the cost of damage to roads sustained from heavy vehicle movements which have discovered that weight distributed onto roads via vehicle axles creates exponentially more damage than the overall weight.

Wangi Road is managed by Transport for NSW, formerly Roads and Maritime and Wilton Road by the Lake Macquarie City Council.

Lake Macquarie City Council’s 2018-2019 Annual Report values *Roads and Bridges* maintenance at \$7,040,126 placing it among the Councils top two expenses. The Annual report projects a 12-month future investment in road resurfacing and upgrades valued at \$42.8 million, making it the largest predicted expense.

The degradation and pavement damage sustained from this additional weight is likely to require additional or sooner than expected road maintenance works, the costs of which will be incurred by Lake Macquarie City Council and Transport for NSW, which is a cost Centennial Coal is ultimately shifting onto taxpayers.

## 3. Impediments to accessing a public facility

Access to the *Awaba Waste Management Facility* located on Wilton Road will be impeded by coal trucks if they are deployed by Centennial.

---

<sup>6</sup> Centre for Road Safety – Heavy Vehicle Trauma Trends Report, March 2017

<sup>7</sup> Fatal Heavy Vehicle Crashes Australia, January – March 2020

<sup>8</sup> US General Accounting Office, Comptroller-General’s report, Excessive truck weight: an expensive burden we can no longer support, 1979

<sup>9</sup> <http://ropi-wh-live.sgcdev.io/wh12/feature/weigh-motion-technology-reduces-road-damage>

The proposal identifies the potential for “cumulative impacts in relation to heavy vehicle traffic on Wilton Road, as Lake Macquarie City Council’s Awaba waste management facility also has its primary access/egress on that road. There is also potential interaction on Wilton Road between trucks used in the modifications, and other vehicles travelling to and from the waste facility and using the road for other purposes.”

Assuming that many of the vehicles travelling to the Awaba Waste Facility will be fully-loaded with waste and a high proportion with trailers attached, the road-safety risk as well as impediment to the public access to a necessary service present a key flaw in the proposal. No solutions to mitigate this situation were identified in the proposal.

### **Alternatives to public road use**

Alternative means of coal transport from the Myuna and Mandalong Colliery’s to facilitate coal-blending and delivery to Eraring power station that do not require trucks to be deployed on public roads have been identified by Centennial including:

1. Installation of a coal beneficiation plant at Myuna’s pit top to improve the quality of coal before it is sent to Eraring Power Station.
2. Blending coal on-site at Eraring Power Station to improve the quality of Myuna coal before it is used for energy production

The proposal states that the beneficiation plant alternative was ruled out due to high costs, additional noise near to receptors and on-going management of waste material.

The second alternative of coal blending on-site at Eraring power station was not pursued as it does “not align with Origin’s preferred coal delivery strategy”<sup>10</sup>, however an Origin Energy spokesperson has since contradicted this stating it will “commence talks with Centennial Coal about the mining company’s plans to transport coal via public roads in south-west Lake Macquarie.”<sup>11</sup>

Numerous comments from local residents on social media cite the option of coal-blending on the Eraring power station site as a logical and preferable solution to Centennial and Origins coal-supply issue.

This option would also eliminate the need for changes to the consent conditions currently in place which limit key disruptive impacts of mining operations, including public road use and noise criteria.

The proposal in its current form requests changes to consent conditions “which prohibit the transport of coal from Myuna on public roads and prescribe that all coal from Myuna is transported from the site via the enclosed overland coal conveyor to Eraring Power Station.”

Conditions to prohibit coal being transported on public roads must be maintained in the interest of public safety.

The presence of heavy industrial vehicles on public roads in populated regions are a costly public nuisance at best, and a lethal safety risk at worst and the proposal must be rejected on these grounds.

---

<sup>10</sup> Myuna Colliery Modification report for modification to project approval MP 10\_0080

<sup>11</sup> <https://www.newcastleherald.com.au/story/6878039/origin-keen-for-talks-about-controversial-plan-to-run-coal-trucks-on-lake-macquarie-roads/>