18 October 2012

Office of the General Manager
Reference File: F05049 - 12/160428

Dr Neil Shepherd AM
Chair, Coalpac Commission Chair
GPO Box 3415
SYDNEY NSW 2001

Dear Dr Shepherd,

**SUBJECT** Blue Mountains submission to the Proposed Coalpac Consolidated Project - Castlereagh Highway, Cullen Bullen

The Council welcomes the opportunity to express its views on the Coalpac Consolidated Project proposal and offers the following comments for your consideration.

The Council considers the proposed additional 102 coal trucks and 128 sand truck (delivery and return) movements per day for up to the 290 haul days as totally unacceptable. This increase of 230 truck movements per day would have a detrimental effect on the life style, amenity of residents in the Blue Mountains. The changes in vehicle movement numbers as detailed in the proposal will change the current and tolerated movements residents have, to some extent, accepted.

The Blue Mountains Corridor already attracts approximately 1018 truck movements per day (359,523 total movements in 2011). The proposed increase in truck movements within this application represents a 23% increase on the current levels.

The issue of road freight movement in the Blue Mountains is highly contentious and requires careful management to secure the highest possible standards of road safety and amenity for all road users. The Council continues to advocate for an increased use of rail freight to transport bulk products such as coal, gravel, sand and fuel.

The current Draft NSW Long Term Transport Master Plan and the re-working of the NSW State Metropolitan and Transport plans provides further opportunity to advocate for the establishment of improved rail freight infrastructure into and within the Sydney basin. It is essential that the objective of securing a long term transferral of freight from the road to rail can be achieved by continuing to lobby the appropriate state and federal agencies. The Council is aware that capacity currently exists on the western railway line to accommodate growth in freight movements and considers that it remains the imperative for both the State and Federal Governments to shift freight from our roads to rail.

At present, the highway through the Blue Mountains is currently under pressure from both the high volume and impact of trucks which currently access the Sydney basin via the Great Western Highway and Bells Line of Road. The highway is also
experiencing unprecedented disruption due to the state governments upgrade program, when completed will provide significant road safety and functional improvements.

**Recommendations**

The following recommendations are provided for consideration in the Environmental Assessment being conducted under section 23D(1)(b)(ii) and Schedule 3 of the NSW Environmental Planning and Assessment Act 1979, of the Coalpac Consolidation Project Proposal (10_0178) at Cullen Bullen.

The Council strongly recommends that the impact of additional heavy traffic travelling through the City is properly assessed and that, in particular, the following recommendations are considered and addressed:

- Blue Mountains City Council objects to any increase in the number of heavy vehicles routinely using Harley Avenue;
- Blue Mountains City Council strongly urge that Coalpac Consolidation Project prepare a detailed investigation into the use of rail transport for the haulage of coal to a central depot/s with the intention that coal and sand is stockpiled in the Hunter/Central Coast region, south coast region and a western region. The coal then be loaded onto trucks at the stockpile for delivery to individual customers. The investigation should include all costs and logistical issues relevant to the haulage of coal, including the savings of not hauling the coal by road such as fuel costs, reasonable estimates of wear and tear on infrastructure, road crash reductions and consequent savings, repair and replacement costs of vehicles and labour costs for drivers for the life of the consent. A comparison of the complete and reasonable cost alternatives should be included in the Environmental Assessment;
- The planned upgrade of the road between Mt Victoria and Lithgow could impact significantly on the proposal and may eliminate impacts on Harley Road. Blue Mountains City Council requests that the Coalpac Consolidation Project make representation to the Roads and Maritime Services as to the route and the timing for the upgrade and that this information be included in the Environmental Assessment. Blue Mountains City Council requests that the advice be factored into the assessment and properly addressed within the proposal;
- Blue Mountains City Council requests that if the above information alters the proposed haulage strategy, then Coalpac Consolidation Project advise Blue Mountains City Council with a view to amending their requirements in accordance with the probable impacts from the additional information; and
- Blue Mountains City Council notes concerns about the impact that increased coal mining will have on our World Heritage status, given the contribution of coal to the threat posed by climate change.

**Determinations - Consent Approval**

In the event that consent is approved Blue Mountains City Council will strongly urge that the Planning Assessment Commission require Coalpac Consolidation Project to undertake the following:

- That Harley Avenue be upgraded in accordance with Blue Mountains City Council design plans;
- That Coalpac Consolidation Project enter into a formal agreement with whom with respect to the road maintenance of Harley Avenue based on either an average number of truck movements or the actual number of truck movements as a percentage of the total of the trucks using Harley Avenue;
I trust that this submission conveys the seriousness of the issue and the significant concern with which the Council views the proposal by Coalpac Consolidation Project.

Ensuring that the quality and values of the Blue Mountains are not negatively impacted by this proposal is critical and that the aims and objectives of the Great Western Highway Management Plan are adhered to in addition, at the time of seeking World Heritage status, the listing was significantly jeopardised by the challenge of a city and major transport corridor being contained within a World Heritage area recognised for its natural values. Ongoing vigilance in protecting those values is therefore essential.

If you require any further information on this matter then please Andy Turner, Manager City Planning on (02) 4780-5513 or aturner@bmcc.nsw.gov.au

Yours faithfully

Robert Greenwood
General Manager