

WTC Submission December 2015
Inbox

Mon, Dec 7, 2015 at 4:24 PM

WOLLONGONG TRANSPORT COALITION

Submission to the Planning
Assessment Commission re Russell Vale Colliery
Underground Expansion Project December 2015

The Wollongong Transport Coalition (WTC) appreciates that the Commission is reviewing the application along with the many submissions lodged in response to an earlier proposal, and, a December 2014 Secretary's Environmental Assessment report.

The applicant, now Wollongong Coal, is seeking, inter alia, approval for its mine at Russell Vale to expand run-of-mine coal production.

WTC is most concerned at the prospect of extra coal trucks being placed on Bellambi Lane, Memorial Drive, and to the Port Kembla Coal Terminal

WTC strongly supports the stated position of Wollongong City Council that (to quote page 57 of the Secretary's Environmental Assessment report) "that Wollongong Coal should be required to contribute to the maintenance of Bellambi Lane...".

WTC questions why the Department of Planning and Environment does not support this view, and

asks why the burden of the extra road maintenance costs due to heavy truck operations should be placed onto Wollongong City ratepayers.

In addition, WTC supports Council's proposal that "Wollongong Coal should be required to seal and line-mark the employee car park" and would also question why the Department of Planning and Environment does not support this request.

WTC would remind the Planning Assessment Commission that 1979 conditions on the Russell Vale mine (formerly the South Bulli Colliery) included overall coal haulage to the PKCT being capped at two million tonnes per annum (mtpa), and this was to be achieved by construction of a conveyor from the South Bulli Colliery to rail loading facilities near Bellambi Station. Agreement for this conveyor construction was reached in 1979. These conditions were not mentioned in the application, or, the 2014 Secretary's Environmental Assessment report.

Freight

Wollongong's main roads to Port Kembla have no shortage of coal trucks, now over five million tonnes per annum (mtpa) to the Coal Terminal and with the prospect of 10 mtpa, plus more coal to the steel works. Plus car carrying trucks since 2008, and approval in mid 2011 to expand Port Kembla Outer Harbour with more big trucks.

These cumulative impacts increased following a determination by the Planning and Assessment Commission in December 2011 to approve an application to lift road haulage of grain to Port

Kembla from 200,000 to 500,000 tonnes per annum.

On top of the coal and the grain along with general freight and car imports, there are now extra quarry products on Mt Ousley and other roads (Hanson's Bass Point Quarry and Boral's Dunmore Quarry).

No other city in Australia is subject to this imposition of bulk haulage by road with its increased road crash risk, noise and air pollution, plus road congestion. To add insult to injury, the operations of the heavier trucks are arguably subsidised by lower fuel taxation (than for cars) and for the road damage big trucks that travel large distances each year, fixed annual registration charges.

In assessment, regard should be paid to the statement on page 4 of the 2006-2031 Illawarra Regional Strategy of the Department of Planning as follows: "It is important that the Region's transport networks support economic growth and maximise the efficiency of freight transport. In particular, what is required are strategic transport corridors to support development of the port of Port Kembla, increase the proportion of freight transported by rail (emphasis added), efficiently link regional centres and towns, and support public transport."

At the very least, the Department of Planning and Environment should adhere to the stated policy of the NSW Government in the late 1970s which was clear and to the point: All coal from new

or expanded mines shall be transported by rail, and, road transport of coal shall be subject to tough conditions.

Draft conditions to restrict hours of truck operation are support - surely, coal transport on week days could cease at 6 pm rather than 10 pm?

Another draft condition provides for a traffic management plan to involve RMS etc - why not extend consultation to include Wollongong City Council and residents?

It is recommended that this plan also require for the installation of tachographs on all coal trucks, and that trucks have specified noise limits.

In addition, a condition should be inserted that Wollongong Coal shall contribute to the road maintenance costs of Bellambi Lane.

A 1990 Report of a Wollongong City Council Coal Transportation Task Force noted that the NSW Roads and Traffic Authority had then suggested that an average external cost of pavement wear and tear due to bulk haulage was then 3 cents per net tonne kilometre. This estimate is in part supported by the NSW Independent Pricing and Regulatory Tribunal of New South Wales in its 2012 Review of Access Pricing for the NSW Grain Line Network.

The suggestion by the Secretary's Environmental Assessment report) that Wollongong Coal should not be required to contribute to the maintenance of Bellambi Lane comes at a time when Council's infrastructure budget is under extreme pressure, and ratepayers

have had to accept special rate increases. WTC asks the Planning and Assessment Commission to impose a charge to cover the costs to both Council and the RMS roads. With a 14 km haul from the mine to the Port Kembla Coal Terminal, it is recommended that a charge of at least 50 cents per tonne be levied.

If the Company wishes to expand its production of its Russell Vale mine past five years and or above one million tonnes per annum, it is suggested that consideration be given to opening of a new mine outlet and connection to the proposed Maldon Dombarton rail link. Or the company should be required to show cause why it should not construct a conveyor from the mine to rail loading facilities near Bellambi Station (as agreed by the previous owners of the mine).

Maldon Dombarton link

The Maldon Dombarton project is one third completed already. Port Kembla expansion to date has already put more pressure on the Mt Ousley, Picton and other roads. Plans for further expansion of the Outer Harbour envisage most extra freight on rail, however, as seen by the NSW Roads and Traffic Authority in regards to projected Stage 1 Port Kembla outer harbour traffic volumes (bulk, general and limited containers) in an official June 2010 submissions report; if the predicted rail mode share could not be achieved, there would be likely "... unacceptable impacts to road safety and traffic efficiency as well as environmental issues such as amenity, noise and air quality."

We note that Maldon Dombarton link has advanced to the point where invited expressions of interest to complete this link have been recently declined by Transport for NSW. The region deserves better than this.

In conclusion

WTC requests that the application, if approved, have consent conditions that make it very clear that there will no expansion run-of-mine coal from above a level of one million tonnes per annum (mtpa) AND that any further applications for increasing production of run of mill coal production above 1 mtpa be accompanied by analysis of the wider benefits and costs opening of a new mine outlet and connection to the long proposed Maldon Dombarton rail link and/or construction of a conveyor from the South Bulli Colliery to rail loading facilities near Bellambi Station (as agreed to by the previous owners of the mine in 1979).

In addition, consent conditions regarding the road haulage of coal should extend to requiring Wollongong Coal to make payments to Wollongong City Council for the maintenance of Bellambi lane and minimizing road safety risks and improve amenity for residents. In addition to any code of driver behaviour, there should be requirements for coal trucks to be fitted with tachographs.

Irene Tognetti

Spokesperson

