

## Bradley James

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**From:** Bradley James  
**Sent:** Monday, 29 April 2024 12:28 PM  
**To:** Callum Firth  
**Subject:** FW: IPCN determination for proposed Lidsdale Siding Mod 5 and Clarence Colliery Mod 10

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**From:** Geoff Miell [REDACTED]  
**Sent:** Monday, 29 April 2024 12:27 PM  
**To:** Bradley James [REDACTED]  
**Subject:** IPCN determination for proposed Lidsdale Siding Mod 5 and Clarence Colliery Mod 10

**Brad James** – Principal Case Manager, Office of the Independent Planning Commission of NSW (IPCN)

It has come to my recent attention that the IPCN received on 16 Apr 2024 a referral for determining the following:

- **Lidsdale Siding Mod 5 and Clarence Colliery Mod 10**

Clarence Coal is seeking approval to continue trucking increased volumes of coal to Mount Piper Power Station (MPPS) and/or to Lidsdale Siding until 31 December 2026.

<https://www.ipcn.nsw.gov.au/cases/2024/04/lidsdale-siding-mod-5-and-clarence-colliery-mod-10>

**I'd suggest if the Proponent needs to import more coal into Lidsdale Siding for onward conveyance to MPPS then they have the necessary approvals and infrastructure to do so VIA RAIL already (since MOD 2 was approved on 24 Oct 2019). In my opinion, there is no necessary requirement for the proposed Lidsdale Siding Mod 5 and Clarence Colliery Mod 10, and thus these consent modifications should be REFUSED.**

Per the NSW Department of Planning, Housing and Infrastructure's (DPHI's) *Assessment Report*, dated Apr 2024, the **Executive Summary** included:

The Clarence Colliery (DA 504-00) and Lidsdale Siding (MP 08-0223) projects were modified in November 2022 to allow for a short-term increase in road transport of coal product to Mount Piper Power Station (MPPS) (from 100,000 tpa to 200,000 tpa) and to allow for Lidsdale Siding to temporarily receive and handle up to 200,000 tpa of coal product by road until 31 December 2023.

Centennial proposes to modify the consents to continue to truck increased coal volumes (from 100,000 tpa to 200,000 tpa) from Clarence directly to MPPS and/or to Lidsdale Siding for onward delivery to MPPS via overland conveyor until 31 Dec 2026. The modifications are proposed to maintain coal stockpile levels at the power station and assist in meeting the electricity demands of NSW.

All aspects of the proposed modifications are consistent with the most recently approved modifications for Clarence and Lidsdale Siding (MOD 9 and MOD 4, respectively), with the exception of the timeframe.

The modification applications were lodged under Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Department is satisfied that the proposed modifications are within the scope of section 4.55(1A) and can be assessed and determined under this section.

The Independent Planning Commission of NSW is the consent authority for the modification applications as Centennial has reported political donations.

The modifications were publicly exhibited and received one supporting submission from EnergyAustralia. No public submissions were received. The Environment Protection Authority (EPA) and Lithgow City Council did not raise any concerns regarding the proposed modifications. Lithgow City Council provided recommendations for conditions of consent. Transport for NSW requested a Traffic Management Plan be prepared.

The **Clarence consent (DA 504-00)** proposed modification involves:

- Increasing the maximum total annual road coal transport from Clarence from 200,000 tpa to 300,000 tpa, until 31 Dec 2026, and
- Increasing the maximum annual road coal transport from Clarence to MPPS or Lidsdale Siding from 100,000 tpa to 200,000 tpa, until 31 Dec 2026.

The **Lidsdale Siding consent (MP 08\_0223)** proposed modification involves:

- Receiving up to 25 laden trucks per day to deliver coal to the site from Clarence, until 31 Dec 2026. Deliveries would occur between 7 am and 10 pm Monday to Saturday and 8 am and 10 pm on Sundays and public holidays.

I note in the Apr 2020 report titled *Lidsdale Siding: Modification report for the modification to development consent 08\_0223* for **Lidsdale Siding MOD 3 - Removal of Rail Unloading Restrictions**, where it included in **1.5 Justification and alternatives**:

As described in the *Environmental Assessment for Modification to Development Consent 08-0223* for Mod 1 (EMM 2019a), Springvale Mine is the primary source of coal for MPPS. In early 2019, due to continued lower coal yields from Springvale Mine, associated with the commencement of mining in the southern longwall blocks, a potential shortfall in coal supply to MPPS was identified. As a result, Centennial implemented supplementary coal supply measures to ensure MPPS coal demands could continue to be met. As an immediate, short-term measure, Centennial also received approval for a modification to Clarence Colliery's development consent (DA 504-00) to:

- increase total allowable coal haulage off-site from Clarence Colliery by road from 200,000 tonnes (t) to 300,000 t for a limited period of time up to 31 December 2020; and
- increase total allowable coal haulage off-site from Clarence Colliery to the west by road from 100,000 t to 200,000 t for a limited period of time up to 31 December 2020.

These supplementary coal supply measures are a short-term, temporary solution and are not a long-term option to supply additional coal to MPPS. This is due to the limited volume of coal that can be transported by road from Clarence Colliery and the potential impacts associated with a sustained increase in heavy vehicle movements on the local and regional road network.

As a result, Centennial and EnergyAustralia NSW Pty Ltd (EnergyAustralia) investigated other opportunities to supplement coal supplies to MPPS should there be another coal supply shortfall. The alternatives considered included:

- Road haulage of coal from Airly Mine. Airly Mine has sufficient available coal; however, this was not considered a viable alternative due to potential impacts on the local and regional road network and the outcomes of community engagement during previous environmental assessments.
- Coal extraction and transfer from Angus Place. Angus Place was placed on care and maintenance in 2015 and additional approvals under the EP&A Act would be required to facilitate the transfer of coal from Angus Place to MPPS. This is not a viable alternative to meet predicted shortfalls in coal supply to MPPS due to the length of time required to obtain additional approvals.

- Other historical local suppliers. None of the other mines that have historically supplied coal to MPPS are currently operational. Even if it was technically and commercially feasible to reopen these mines, there would be long lead times (years) to complete the necessary design work and obtain approvals so this is not a viable alternative to meet predicted shortfalls in coal supply to MPPS.
- Other rail unloading and coal transfer options. EnergyAustralia received approval for the construction of the Pipers Flat rail unloader facility in 2009 and a modification to the consent in 2019 included a revised design to improve efficiency and reduce the environmental impacts of the development, as well as a request to extend the required start date of the approval permit. Construction of the Pipers Flat rail unloader facility is anticipated to take a number of years so the Pipers Flat rail unloader facility is not considered an option to meet predicted shortfalls in coal supply to MPPS.
- Road haulage of coal from other operations in NSW. The additional heavy vehicle traffic required to meet predicted shortfalls in coal supply to MPPS would be significant and it is anticipated that associated impacts to the local and regional road network is unlikely to be considered acceptable by affected local communities or regulatory stakeholders.

Mod 1 to Lidsdale Siding’s consent was approved on 23 August 2019. It allowed the receipt and unloading of up to one coal-laden train to the facility and construction of supporting infrastructure to facilitate unloading activities at the facility. This modification was considered to be the most viable option for the supply of coal to MPPS under emergency situations, as it allows coal to be unloaded, handled and transported off-site to MPPS using the existing overland conveyor system via the WCS site and existing approved infrastructure at Lidsdale Siding.

Mod 2 to Lidsdale Siding’s consent was approved on 14 October 2019. It allowed an increase in the number of laden trains being unloaded at the site. This modification enabled an increase in the volume of coal that can be unloaded at, and transferred from, the facility to MPPS.

The proposed modification would allow an ongoing supply of supplementary coal to MPPS and remove risks associated with coal supplies being provided by a single mining operation. The continued supply of coal from the facility will help support the ongoing and efficient operation of MPPS and continued supply of electricity to NSW.

The proposed modification is within the objectives of the facility’s consent, being the handling and transportation of coal with a reduced reliance on road transport for coal deliveries, and thus is substantially the same development as the original project, as discussed in Chapter 5.

<https://www.planningportal.nsw.gov.au/major-projects/projects/lidsdale-siding-mod-3-removal-rail-unloading-restrictions>

**Why has DPHI, Blue Mountains City Council (BMCC) and Lithgow City Council (LCC) allowed “an immediate, short-term measure” to become, without OBJECTION, a longer-term measure? Do BMCC and LCC welcome a continued reliance on heavy road transport for coal deliveries within their respective LGAs and the consequences that has on road maintenance, noise levels, vibrations and emissions?**

I note that Southern Shorthaul Railroad (SSR) offers a fleet of **PTHH-class rail coal hopper wagons**. The specifications include:

- Manufacturer: Bradken Rail Australia
- Build Dates: 2010-2011
- Quantity Operated: 152 (permanently coupled in pairs)
- Tare Weight: 43.4 t (per pair)
- Gross Weight: 200.0 t (per pair)
- Load Capacity: 156.6 t (per pair)
- Maximum Speed: 100 km/h
- Unit Length: 32.3 m (per pair)

<https://ssrail.com.au/locomotives-wagons/specifications/>

Per my calculations:

- 25 pairs x 156.6 t = 3,915 t (per 50-wagon train)
- **52 trains/year x 3,915 t = 203,580 tonnes/y**

It seems to me one laden coal train per week, consisting of 50 PTH-class wagons with two locomotives at one end & one locomotive at the other end, can more than adequately substitute for up to 175 laden road coal trucks (or 350 total truck movements) per week for the movement of up to 200,000 tpa of coal proposed between Clarence Colliery and Lidsdale Siding for onward conveyance to MPPS.

The Consolidated Consent for **Lidsdale Siding Coal Loader MOD 4** was approved on 17 Nov 2022, and includes (on page 5):

### Coal Transport

6. The Proponent must not receive more than 6.3 million tonnes of coal at the site in any calendar year.
7. Except for the period referred to in condition 7A, the Proponent must ensure that:
  - (a) all coal is transported to or from the site by conveyor or by rail;
  - (b) no more than 7 trains arrive at or leave the site each day (a maximum of 14 movements per day);
  - (c) no more than 5 trains arrive at or leave the site each day, when averaged over a calendar year; and
  - (d) coal train loading operations are not undertaken on the same day as coal train unloading operations.
- 7A. Until 31st December 2023, the Proponent may receive up to 25 laden trucks per day to deliver coal to the site between 7 am to 10 pm Monday to Saturday and 8 am to 10 pm on Sundays and public holidays.

<https://www.planningportal.nsw.gov.au/major-projects/projects/lidsdale-siding-coal-loader-mod-4>

Five coal laden trains per day for 365 days represents up to 7,144,875 t, which exceeds the 6.3 Mt/year limit for the Lidsdale Siding site.

I'd suggest this is far more than MPPS requires for its operations. Per the Sep 2006 report by SKM for the **Western Rail Coal Unloader Preliminary Environmental Assessment**, on page 3:

### 2.4 Project Need

The current demand for coal at Mt Piper Power Station is approximately 3.7 million tonnes per annum (mtpa) while at Wallerawang Power Station it is approximately 2.3 mtpa. Forecast increases in electricity demand together with the recently approved upgrade of Mt Piper, providing a 14% increase in capacity, may increase the total coal demand by up to 1.0 mtpa.

<https://www.planningportal.nsw.gov.au/major-projects/projects/project-application-rail-unloader>

Per OpenNEM, between 28 Apr 2023 through to 28 Apr 2024, MPPS produced circa 6.3 TWh of energy, with an average capacity factor of 51.2%.

<https://opennem.org.au/facility/au/NEM/MP/?range=1y&interval=1d>

MPPS requires about 3.5 Mt/y of coal to produce of the order of 8-9 TWh of electrical energy.

I'd suggest if the Proponent needs to import more coal into Lidsdale Siding for onward conveyance to MPPS then they have the necessary approvals to do so via rail already (since MOD 2 was approved on 24 Oct 2019). IMO, there is no need for the proposed Lidsdale Siding Mod 5 and Clarence Colliery Mod 10.

Some train sightings I've personally witnessed have included:

1. **26 Oct 2023:** eastbound empty coal wagon train traversing through the Geordie Street, Bowenfels rail crossing consisting of 1 SSR loco leading + 50 coal wagons + 2 SSR locos trailing;
2. **4 Nov 2023:** westbound loaded coal wagon train traversing across the James Street. Lithgow stone bridge, 1 SSR loco leading, 2 SSR locos trailing;
3. **11 Nov 2023:** eastbound empty coal train stopped at Lithgow Railway Station with 1 SSR loco crewed at the rear (I didn't see front of train); and
4. **A Thursday afternoon sometime in 2023:** westbound coal wagon train traversing under the pedestrian bridge near the end of Hughes Street, Lithgow with several leading wagons loaded full with coal and the remainder empty, and propelled by 3 SSR locos, 2 at one end & the other at the other end.

**It seems to me adequate rail transport infrastructure and approvals are already in place to accommodate the proposed volumes of coal transfers between Clarence Colliery and Lidsdale Siding, and there have been instances I've witnessed of westbound laden coal trains, presumably originating from Clarence Colliery.**

Perhaps the IPCN may wish to ask the Proponent why they require a continuation of trucking increased volumes of coal to Mount Piper Power Station (MPPS) and/or to Lidsdale Siding until 31 December 2026, when it seems to me there is already adequate rail transport infrastructure and approvals in place to accommodate the proposed volumes of coal transfers between Clarence Colliery and Lidsdale Siding/MPPS that I'd suggest would have less detrimental impact on the local community?

Food for your thoughts.

Regards,

Geoff Miell  
LITHGOW NSW 2790

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