

SOUTH32 Illawarra Metallurgical Coal



DENDROBIUM MINE TRAFFIC MANAGEMENT PLAN

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DOCUMENT REVISION LOG

Persons authorising this Plan

NAME	TITLE	DATE
Chris Schultz	Superintendent Environment	May 2021

Document Revisions

REVISION	DESCRIPTION OF CHANGES	DATE
1.0	Three yearly review as required by Development Consent	Mar 2008
2.0	Review as required by the revised Development Consent (issued 8 December 2008)	April 2009
2.1	Inclusion of comments from DoP received 13 August 2009	August 2009
3.0	Triennial Review	March 2012
4.0	Review and format update	May 2017
5.0	The following changes have been made: <ul style="list-style-type: none"> Updated roles and responsibilities References to parent company changed Update in accordance with Development Consent 	June 2018
6.0	Update to new format. Inclusion of transport routes road maintenance requirements, removal of rail related information, expansion on DCOC requirements and inclusion of latest version of DCOC.	April 2021

Persons involved in the review of this Plan

NAME	TITLE	COMPANY	EXP (YRS)	DATE
Chris Schultz	Superintendent Environment	South32	25	May 2021
Tom McMahon	Specialist Environment	South32	3	March 2021
Michael Arroyo	Superintendent Logistics	South32	9	March 2021
Amanda Blunt	Principal Community	South32	10	March 2021

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1. INTRODUCTION

Dendrobium Mine is an underground mine which commenced construction in January 2002 following approval from the Minister of the then Department of Urban Affairs and Planning on 20 November 2001. Longwall mining commenced at Dendrobium in April 2005. The mine is owned and operated by Dendrobium Coal Pty Ltd, a subsidiary of Illawarra Coal Holdings Pty Ltd (ICHPL), which is a wholly owned subsidiary of South32 Limited. The mine operates on a continuous basis, 24 hours a day and 7 days a week.

The mining operations are located immediately adjacent to Mt Kembla, approximately 8 km west of Wollongong, NSW, on the Illawarra escarpment (refer to Plan 1). Mt Kembla village, located within 500 m of the Pit Top site, has close historical links with coal mining.

Dendrobium produces predominately metallurgical coal from the Wongawilli Seam (Areas 1, 2, 3) and is approved to produce up to 5.2 million tonnes of run of mine (RoM) coal per annum. The BlueScope Steel Port Kembla Steel Works (PKSW) and Liberty Primary Steel (Whyalla) are major customers. In addition to these Australian based customers, coal is exported via the Port Kembla Coal Terminal (PKCT) to international customers.

Approval for mining in Areas 1, 2 and 3 was granted under DA 60-03-2001, as modified (the Consent).

Dendrobium Mine, Cordeaux Colliery and Appin Mine (and associated facilities) collectively operate as South32 Illawarra Metallurgical Coal (IMC).

This Traffic Management Plan (TMP) has been prepared to detail the relevant traffic impacts, compliance procedures, and controls relating to the mining operations and associated activities. This TMP has been prepared to satisfy Condition 25 of Schedule 4 of the Consent for the Traffic Management Plan.

1.1 Objectives

The objectives of this TMP are to:

- outline processes to comply with the Consent conditions;
- describe transport routes and traffic types;
- manage and minimise the impact of traffic on the community and address traffic safety issues;
- outline a protocol for undertaking dilapidation surveys; and
- detail a Drivers' Code of Conduct (DCOC) for all personnel associated with Dendrobium Mine, including a monitoring and reporting process.

1.2 Scope

The scope of the TMP applies to all existing and future activities related to Dendrobium Mine including operations and construction at:

- Dendrobium Pit Top - consists of administration buildings, workshop, machinery and equipment storage areas, personnel and materials access to the underground workings via the Dendrobium Tunnel, sediment pond and water treatment facility.

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- Kemira Valley Coal Loading Facility (KVCLF) – receives coal from underground via the Kemira Valley Tunnel. Run of Mine (ROM) coal is transported from underground to KVCLF via an extensive coal clearance system. The coal is then fed into a rill tower and deposited onto a 140,000 tonne stockpile from which it is loaded into trains via an enclosed rail-loading chute.
- Dendrobium Coal Preparation Plant (DCPP) – located within the PKSW, the DCPP receives and washes ROM coal from the underground operations.
- Kemira Valley Rail Line (KVRL) – used to transport the coal from KVCLF to the DCPP.
- Ventilation Shaft (VS) 1 - located within the Metropolitan Special Area (MSA) administered by WaterNSW, operates as a downcast shaft (i.e. drawing fresh air into the underground workings). VS1 is located on land owned by IMC.
- VS2 and VS3 – located within the MSA and within Mining Lease ML 1566. VS2 operates as an additional downcast shaft whilst VS3 operates as an upcast shaft (i.e. drawing air out of the underground workings).

Refer to Plan 1 for locations of the above.

In addition to the above, the following residential areas of Mt Kembla are also covered by this plan:

- Cordeaux Road and vehicle movements in and around the Pit Top site; and
- Stones Road and vehicle movements in and around the KVCLF.

1.3 Environmental Management System

IMC has a comprehensive Environmental Management System (EMS) in place to minimise the impact of its operations on the local environment and community. The TMP is a component of the EMS which is certified to ISO 14001.

1.4 Consultation

Consultation has been undertaken as part of this review of the TMP with the Wollongong City Council (WCC), Mt Kembla Public School (MKPS) and Dendrobium Community Consultative Committee (CCC). The comments from the consultation process have been incorporated into this version of the TMP.

Appendix 3 outlines comments from the relevant stakeholders following consultation and the IMC response.

Consultation with stakeholders as stated in Condition 25 of Schedule 4 of the Consent will only be undertaken where there is a material change to the TMP or if specifically requested by DPIE. Administrative or descriptive changes do not constitute a material change.

2. ROLES AND RESPONSIBILITIES

Roles and responsibilities associated with environmental management at Dendrobium Mine are defined in the Environmental Management Strategy. Table 1 outlines the roles and responsibilities associated with the implementation and periodic review of the TMP.

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Table 1: Roles and Responsibilities

Role	Responsibilities
Superintendent Environment	Implementation and periodic review of the TMP.
Manager Approvals General Manager Dendrobium Mine General Manager Mining Services	Provide the necessary resources and systems to ensure that requirements of the TMP are met.
Specialist Environment	Advise, coach and mentor IMC operations with respect to meeting the standards and requirements of the TMP.
Logistics Supervisors	Monitor and review compliance against the requirements of the TMP.
Logistics Superintendent	Traffic management relating to KVCLF and KVRL
External Affairs Team	Meet the commitments contained within the TMP for stakeholder engagement.
Supply Team/Warehouse Team	Investigation and follow up with delivery drivers and their parent companies on DCOC. Reinforce DCOC with transport contract partners.
Contract Service Provider Managers and supervisors	Comply with South32 project delivery and operational requirements.
Operations Personnel Delivery/Transport Drivers	Comply with DCOC.

3. LEGISLATION AND PLANNING

3.1 Consent Conditions

Potential traffic impacts associated with Dendrobium Mine were modelled during the preparation of the Dendrobium Project Environmental Impact Statement (EIS) 2001. The EIS was assessed and approved under the *Environmental Planning and Assessment Act 1979 (EP&A Act)* and associated Regulations.

All activities carried out at Dendrobium Mine will be in compliance with the conditions of the Consent and generally in accordance with the EIS.

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Appendix 1 outlines the traffic management requirements of the Consent and cross references where the requirements have been addressed within the TMP.

3.2 Environment Protection Licence Requirements

Environment Protection Licence (EPL) 3241 applies to Dendrobium Mine and associated activities. A copy of the licence can be accessed at the EPA website:

<http://www.epa.nsw.gov.au/prpoeoapp/>.

3.3 Mining Leases

Dendrobium Mine operates in accordance with the following mining leases:

- Consolidated Coal Lease (CCL) 768.
- Mining Lease (ML) 1510 (covers the KVCLF).
- ML 1566 (covers VS2 and 3).

3.4 Relevant Legislation

Key regulatory and TMP obligations applicable to Dendrobium Mine are managed via an obligations management database. The obligations are allocated to responsible personnel. This process is detailed in the Environmental Compliance/Conformance Assessment and Reporting Procedure.

Legislation that may be applicable to traffic management includes but is not limited to:

- *Protection of the Environment Operations Act 1997 (POEO Act);*
- *Environmental Planning and Assessment Act 1979 (EP&A Act);*
- *Road Transport Act 2013;*
- *Road Transport (General) Regulation 2013;*
- *Road Transport (Mass, Loading and Access) Regulation 2005;*
- *Road Transport (Safety and Traffic Management) Act 2013;*
- *Road Rules 2014;*
- *Road Transport (Safety and Traffic Management) (Road Rules) Regulation 1999;*
- *Road Transport (Vehicles Registration) Act 1999;*
- *Road Transport (Vehicles Registration) Regulation 2017;*
- *Heavy Vehicle National Law (HVNL) Act 2012;*
- *Heavy Vehicle National Law and Other Legislation Amendment Bill 2018;*
- *Heavy Vehicle National Regulations;*
- *Heavy Vehicle (Fatigue Management) National Regulation;*
- *Heavy Vehicle (General) National Regulation;*
- *Heavy Vehicle (Mass, Dimension and Loading) National Regulation; and*
- *Heavy Vehicle (Vehicle Standards) National Regulation.*

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3.5 Guidelines and Standards

This TMP has been developed to be consistent with the principles of the following:

- ISO 14001:2015 Environmental Management Systems;
- South32 Sustainability Policy; and
- South32 Environment Standard.

Other relevant guidelines for traffic management include:

- NSW RMS Road Users' Handbook;
- NSW RMS Heavy Vehicle Driver Handbook; and
- Australian Code for the Transport of Dangerous Goods by Road and Rail.

4. BASELINE ASSESSMENT

A Traffic Impact Statement was prepared in 2001 by Forbes Rigby Pty Ltd as part of the original Dendrobium Project EIS (refer to Volume 2). The purpose of the assessment was to document the findings of the traffic investigations.

The assessment was used as a basis for the identification and implementation of suitable management strategies to minimise traffic impacts associated with the Dendrobium operations. The strategies are outlined in Section 5.

5. TRAFFIC MANAGEMENT AND MITIGATION

There are various locations where the Dendrobium operations could have an impact on local traffic management. These areas, and the associated management strategies, are discussed in more detail in this section.

5.1 Operational Activities and Potential Traffic Issues

5.1.1 Dendrobium Surface Activities

Due to its proximity to Wollongong, Dendrobium Mine employees mostly travel to the site by light vehicle. Employee and contractor numbers vary according to operational activities being undertaken at the time, however are generally around 330 and 280 respectively. Due to the shift times at Dendrobium Mine, light vehicle movements are spaced out over a 24 hour period rather than concentrated at one time.

Medium and heavy vehicles require access to the site for the purposes of:

- delivery of materials and equipment;
- waste bin delivery and removal; and
- providing services where external equipment is required (e.g. environmental monitoring, drug and alcohol testing, crane hire etc).

Buses may be used periodically e.g. during maintenance periods to move personnel between off site parking areas and site.

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Vehicles accessing the site are required to adhere to the DCOC (see Section 5.2.3) and allowable travel times (see Section 5.2.4).

Access to the Pit Top is via Cordeaux Road, which is accessed from either:

- Picton Road > Mount Keira Road > Harry Graham Drive (northern route); or
- Princes Highway (southern route).

The majority of traffic accessing the Pit Top is via the Princes Highway.

5.1.2 **KVCLF**

The KVCLF is designed to operate mostly unattended except for the stockpile equipment operators and site supervisors. Medium to heavy vehicles require access to the site to transport equipment such as earth moving machinery, as well as materials such as fuels, chemicals and lubricants. Vehicles also regularly access the site for maintenance purposes and environmental monitoring.

Vehicles accessing the KVCLF are subject to the DCOC and associated allowable travel times (see Section 5.2.4).

Access to the KVCLF is via Stones Road, which is accessed from either:

- Picton Road > Mount Keira Road > Harry Graham Drive > Cordeaux Road (northern route); or
- Princes Highway > Cordeaux Road (southern route).

The majority of traffic accessing the KVCLF is via the Princes Highway.

All Dendrobium coal is transported via the KVCLF and KVRL. No coal will be transported from the KVCLF by road.

5.1.3 **KVRL**

The KVRL is accessed from multiple public roads for maintenance activities, dependent on the location of works to be undertaken. The primary access points are from Cordeaux Road, Stones Road, Five Islands Road and Marley Place.

5.1.4 **DCPP**

The DCPP is located within the PKSW site. There are multiple entries into the PKSW site, however the most frequently utilised entry gate to the DCPP is from Flinders Street, Port Kembla. Transport of coal from the DCPP to PKCT is via internal PKSW roads.

Coal wash is transported by road to either the Coal Wash Emplacement Area, located at Appin North (via Springhill Road > Masters Road > Princes Motorway > Appin Road) or transported to various locations in the Illawarra Region for beneficial reuse.

All coal/coal wash haulage routes have been authorised, with the requisite permits issued by the National Heavy Vehicle Regulator (NHVR).

5.1.5 **Ventilation Shafts**

Existing Ventilation Shafts (1, 2 and 3) are generally unattended sites, with access generally limited to a weekly maintenance inspection. Additional access to the sites will be infrequent

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and only for specific works. It would only be during these times, and upon decommissioning of the sites, that medium or heavy vehicles would require access to the site.

5.1.5.1 VS1

Access to VS1 is via Harry Graham Drive, which is accessed from either:

- Picton Road > Mount Keira Road (northern route); or
- Princes Highway > Cordeaux Road (southern route).

5.1.5.2 VS2 and 3

Access to VS2 and 3 is via Firetrail 6c, located in the MSA, managed by WaterNSW. There is no general public access to Firetrail 6c.

Firetrail 6c is accessed from Picton Road > Firetrail 6 through the Cordeaux Dam Picnic Area.

5.2 Traffic Mitigation and Management Measures

Control measures are implemented as required to minimise the effects of traffic on the local communities associated with Dendrobium Mine and its related sites during the construction, operational and decommissioning phases of the development.

These control measures may include, but are not limited to, the following:

- signage and physical structures to notify and control drivers to encourage correct behaviour and manage road safety;
- road maintenance;
- DCOC to inform appropriate driver behaviour;
- allowable travel times for road transport;
- provision of designated car parking;
- encouraging 'car-pooling' for employees and contractors or providing bus transport; and
- notification of relevant stakeholders when large loads are required, or road closures are to occur.

5.2.1 Signage and Physical Structures

Physical structures are in place to inform drivers of road conditions in relation to the mine and its associated sites. These include signage, pedestrian refuge areas and painting of road markings both on and off the mine site¹. Detours may be implemented as required. Authorised traffic controllers will be engaged to direct traffic if required.

¹ Marking of lines off site is only undertaken for roads required to be maintained by IMC i.e. Stones Road.

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All employees, contractors and visitors are required to comply with the signposted speed limits on all roads, unless lower self-imposed speed limits are in place².

Temporary variable message signs are also used intermittently to inform drivers of the local road conditions, speed limits, and alert them of area of high pedestrian activity (i.e. around the MKPS).

The speed limit for roads in the MSA is 60 km/hr unless otherwise signposted.

IMC has previously contributed to the widening of access roads and improvement of bridges along Cordeaux Road.

5.2.2 Road maintenance

An agreement is in place between IMC and WaterNSW as required by Condition 26 of Schedule 4 of the Consent for the maintenance of all non-public roads, bridges and creek crossings located in the MSA on land controlled by WaterNSW and used by IMC.

Road maintenance on Stones Road is undertaken as required. A maintenance agreement is in place with the WCC as required by Condition 27 of Schedule 4 of the Consent³.

Dilapidation surveys will be undertaken of public roads and firetrails utilised by IMC:

- prior to the commencement of construction activities and following completion of construction activities⁴; and
- prior to the commencement of decommissioning activities and following completion of decommissioning activities;

as required by and agreed with the infrastructure owner.

Where road maintenance is required during construction or decommissioning, or where emergency repairs are required due to IMC operations, IMC will work with the infrastructure owner to manage the repairs in a timely manner.

Any dispute over implementation of repairs or rehabilitation of public roads will be referred to the Planning Secretary for resolution.

5.2.3 Drivers' Code of Conduct

Dendrobium encourages employees, contractors and visitors to focus on their driving behaviour by reinforcing requirements during site inductions and through relevant training such as the Site Induction and Environment Awareness Training package. Driver behaviour is managed across the sites through measures such as the DCOC (Appendix 2).

Employees, contractors and visitors accessing the Dendrobium Pit Top, KVCLF or ventilation shaft sites will continue to be made aware that responsible driving is a condition of employment at Dendrobium.

The DCOC outlines the driving behaviour required of all employees, contractors and visitors. Any drivers reported or found to be acting in a manner contrary to the DCOC may

² Stones Road has a 40 km/hr speed limit for heavy vehicles.

³ Current agreement is in place until 28 August 2026.

⁴ Note that this applies to new sites as opposed to construction activities on existing sites.

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be subject to disciplinary action. The Consequence Management Procedure may apply to IMC employees for managing continued underperformance and misconduct.

All drivers, including operators of heavy vehicles, are required to comply with the speed limits designated by signage installed by the Roads and Maritime Services (RMS) and to drive to road conditions i.e. slow down in wet conditions and on narrow roads. A heavy vehicle speed limit of 40 km/hr has been imposed by IMC on Stones Road.

Delivery vehicles can only access the mine during the allowable travel times (see Section 5.2.4) except for safety or production related emergencies where the General Manager is required to approve deliveries outside of the allowable times.

IMC reserves the right to review a contractors' continued working association with IMC following any breaches of the DCOC. This may include a review of site access by contract partners' employees, a review of contract terms or suspension/termination of the contract for repeated breaches.

5.2.4 Allowable Travel Times

The Allowable Travel Times for vehicles, other than personnel passenger vehicles⁵, to the Pit Top, KVCLF or VS1 are as follows:

- Monday to Friday – 7.00 am - 8.00 am, 9.30 am - 2.30 pm, 4.00 pm - 5.00 pm.
- Saturday – 8.00 am - 1.00 pm.

Dendrobium Mine shift changeover times take into account the MKPS pick up and drop off times.

5.2.5 Car Parking

Off street car parking is provided for employees, contractors and visitors at the Dendrobium Mine Pit Top. Upgrades of car parking areas have been undertaken to provide additional car parking, and additional car parking areas will be developed as required.

Employees and contractors are advised through pre-start shift communications that parking on Cordeaux Road in the vicinity of the Pit Top is not permitted. Reminders are provided periodically to the workforce to reiterate this requirement.

Designated off road car parking is available at the KVCLF and DCPD.

5.2.6 Car Pooling

Employees and contractors at the Dendrobium Mine Pit Top are encouraged to car pool to minimise work-related light vehicle movements and parking issues. Designated car parking spaces are available for car pool vehicles.

Buses may be used to transport personnel to site e.g. when major maintenance and shutdown activities are occurring.

⁵ Personnel passenger vehicles are defined as vehicles used to transport people to and from work, including trades persons required to travel with their tools of trade in work vehicles to get to and from work. This definition also includes buses.

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5.2.7 **Community Notifications**

Proactive communications will be made to relevant stakeholders where a planned operational activity has the potential to create significant traffic related issues. This may include where greater than normal volumes of heavy vehicle movements are anticipated e.g. during longwall moves, when over-dimensional loads are anticipated and where roadworks associated with IMC operations are planned. These notifications may be made by phone calls, door knocks, email notifications, letterbox drops, via the community newsletter or at a CCC meeting.

Notification will nominally include the scheduled date(s) and approximate time(s) of the traffic movement/s and a description of the traffic movement (i.e. piece of equipment etc) or disruption.

5.2.8 **Ongoing Improvement Opportunities**

IMC will continue to research and where relevant, develop and implement, reasonable and feasible traffic management and mitigation measures to maintain traffic and noise related issues at acceptable levels to the community, and to address any community concerns.

6. **TRAFFIC MONITORING PROGRAM**

Traffic related issues associated with the Dendrobium operations will continue to be closely monitored to ensure that they are managed to an acceptable level. The ways in which traffic related issues are monitored at Dendrobium include:

- a) DCOC; and
- b) Community Call Line.

6.1 **Drivers' Code of Conduct**

The DCOC is an integral part of the traffic management system for the Dendrobium operations. The monitoring of compliance against the DCOC occurs both internally (via Dendrobium Mine operational personnel and Leadership Team, IMC External Affairs Team and Warehouse employees) and externally (via the community call line – see Section 7.1). Breaches of the DCOC are followed up immediately with the employee, contractor or contract company involved, via the process outlined in the DCOC, to minimise the risk of follow-up incidents or breaches of the DCOC.

6.2 **Community Call Line**

Traffic issues related to the Dendrobium operations can be identified by members of the local community. The community call line (see Section 7.1) allows the local community to provide feedback on these issues to IMC. Enquiries and complaints received via the community call line will be followed up by the appropriate IMC personnel.

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7. COMPLAINTS AND NON-COMPLIANCE MANAGEMENT

7.1 Complaints and Dispute Resolution

IMC has a 24 hour, free community call line (1800 102 210) and email address (illawarracomunity@south32.net) which is displayed at IMC Projects and Mine Sites, and included in newsletters, letters and other correspondence. The call line is for all complaints and general enquiries regarding environmental or community issues associated with IMC's operations.

Community complaints and enquiries may also be received in person by any employee of IMC, with details to be immediately shared with the External Affairs Team for investigation. All traffic related complaints received in relation to Dendrobium Mine will be managed in accordance with the Handling Community Complaints, Enquiries and Disputes Procedure.

Upon receipt of a community complaint, preliminary investigations will commence as soon as practicable to determine the likely cause of the complaint. An initial response will be provided to the complainant within 24 hours of the complaint being made, with a follow up response being provided as soon as practicable once a more detailed investigation is complete.

Where traffic related issues are raised by an affected landowner or community member and the affected landowner or community member requests feedback in relation the issue raised, the landowner or community member will be provided with the investigation results and proposed course of corrective action.

A summary of all complaints received during the reporting year will be provided as part of the Annual Review. A log of complaints is also maintained on the IMC website at:

<https://www.south32.net/our-business/australia/illawarra-metallurgical-coal/documents>.

7.2 Events, Non-Compliance, Corrective Action and Preventative Action

Events, non-compliances, corrective actions and preventative actions are managed in accordance with the Reporting and Investigation Standard and Environmental Compliance/Conformance Assessment and Reporting Procedure. These procedures, which relate to all IMC operations, detail the processes to be utilised with respect to event and hazard reporting, investigation and corrective action identification. The key elements of the process include:

- identification of events, non-conformances and/or non-compliances;
- recording of the event, non-conformance and/or non-compliance in the event management system (G360);
- investigation/evaluation of the event, non-conformance and/or non-compliance to determine specific corrective and preventative actions;
- assigning corrective and preventative actions to responsible persons in G360; and
- review of corrective actions to ensure the status and effectiveness of the actions.

Traffic related incidents will be reported to all relevant agencies as detailed in Section 8.

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8. REPORTING AND REVIEW

8.1 Annual Review

IMC will report on the performance of the TMP in the Annual Review.

The Annual Review will include:

- details of complaints and non-compliances and management/mitigation measures undertaken; and
- a review of the performance of management/mitigation measures and the monitoring program as applicable.

The Annual Review is prepared in accordance with Condition 5 of Schedule 8 of the Consent and is submitted to relevant agencies in September each year. Annual Reviews are made available to the general public via the South32 website.

8.2 Incident Notifications

In accordance with Condition 3 of Schedule 8 of the Consent, the Department and any other relevant agencies will be notified within 24 hours by IMC after becoming aware of an incident⁶. The notification will be in writing and submitted to compliance@planning.nsw.gov.au and identify the development and set out the location and nature of the incident.

8.3 Review of TMP

In accordance with Condition 2A of Schedule 8 of the Consent, the TMP will be reviewed, and if necessary revised, within three months, of:

- a) the submission of an incident report;
- b) the submission of an Annual Review;
- c) the submission of an Independent Environmental Audit (IEA) report; or
- d) the approval of any modification of the conditions of the Consent (unless the conditions require otherwise).

Outcomes from each review will be documented in the Management Plan Review Log. The TMP will only be revised where a material change to site operations or environmental management has occurred, or in accordance with the review period on the TMP. Administrative or descriptive changes do not constitute a material change.

Where a review triggers a revision of the TMP, the TMP will be revised and submitted to the Planning Secretary for approval. The approved TMP will be implemented.

⁶ An incident is defined as an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.

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8.4 Audits

8.4.1 IEA

In accordance with Condition 6 of Schedule 8 of the Consent, an IEA shall be commissioned every three years, that will include a review of the TMP. The report is required to be submitted to the Planning Secretary and any other NSW agency that requests it, together with the response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations, within three (3) months of commencing the IEA⁷, in accordance with Condition 7 of Schedule 8 of the Consent.

IEAs have been conducted every three years since 2008, with the last IEA being conducted in 2020 and the next IEA to be conducted in 2023. Recommendations from the IEA will be incorporated into the TMP where appropriate.

8.4.2 ISO 14001

As part of the ISO 14001 certification, IMC maintains an environmental auditing and governance program across all of its operational sites. The program, which includes the use of competent internal and accredited external auditors, is an integral part of maintaining certification under the ISO 14001 standard.

External surveillance audits are undertaken on an annual basis, with recertification audits undertaken every three years.

Internal Governance Reviews of the TMP are nominally undertaken on a three yearly basis.

⁷ The date of commencing the IEA is defined as the first day of the site inspection.

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9. SUMMARY OF COMMITMENTS

Commitment	Section in TMP
IMC will provide personnel and resources to implement the TMP.	Section 2
IMC will comply with the conditions of the Consent and relevant legislation.	Section 3
Access to sites will be via defined transported routes.	Section 5
No coal will be transported from the KVCLF by road.	Section 5.1.2
IMC will utilise signage and physical structures to inform road users of road conditions where required.	Section 5.2.1
IMC will undertake road maintenance as required under agreements.	Section 5.2.2
IMC will communicate the requirements of the DCOC to site personnel, contractors and visitors.	Section 5.2.3
IMC will monitor compliance with the DCOC and take remedial action where breaches have been identified.	Section 5.2.3
IMC will provide designated car parking for site personnel.	Section 5.2.5
IMC will encourage car pooling where issues are identified with site car parking or vehicle movements to and from the site.	Section 5.2.6
IMC will provide notifications to relevant stakeholders where planned activities may create traffic related issues.	Section 5.2.7
IMC will report and investigate complaints, incidents and exceedances of limits as required, and identify and implement corrective actions.	Section 7
IMC will undertake reporting as required.	Section 8
IMC will review the TMP and undertake consultation with relevant stakeholders as required.	Section 8.3
IMC will undertake audits as required.	Section 8.4

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10. ACRONYMS

Term	Definition
CCC	Community Consultative Committee
DCOC	Drivers' Code of Conduct
DCPP	Dendrobium Coal Preparation Plant
DoPI	Department of Planning and Infrastructure
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EP&A Act	Environmental Planning and Assessment Act
FY	Financial Year
G360	IMC event reporting system
ICHPL	Illawarra Coal Holdings Pty Ltd
IMC	Illawarra Metallurgical Coal
km	kilometre
KVCLF	Kemira Valley Coal Loading Facility
KVRL	Kemira Valley Rail Line
MKPS	Mt Kembla Public School
MSA	Metropolitan Special Area
PKCT	Port Kembla Coal Terminal
PKSW	Port Kembla Steel Works
RMS	Roads and Maritime Services
TMP	Traffic Management Plan
WCC	Wollongong City Council

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11. REFERENCES

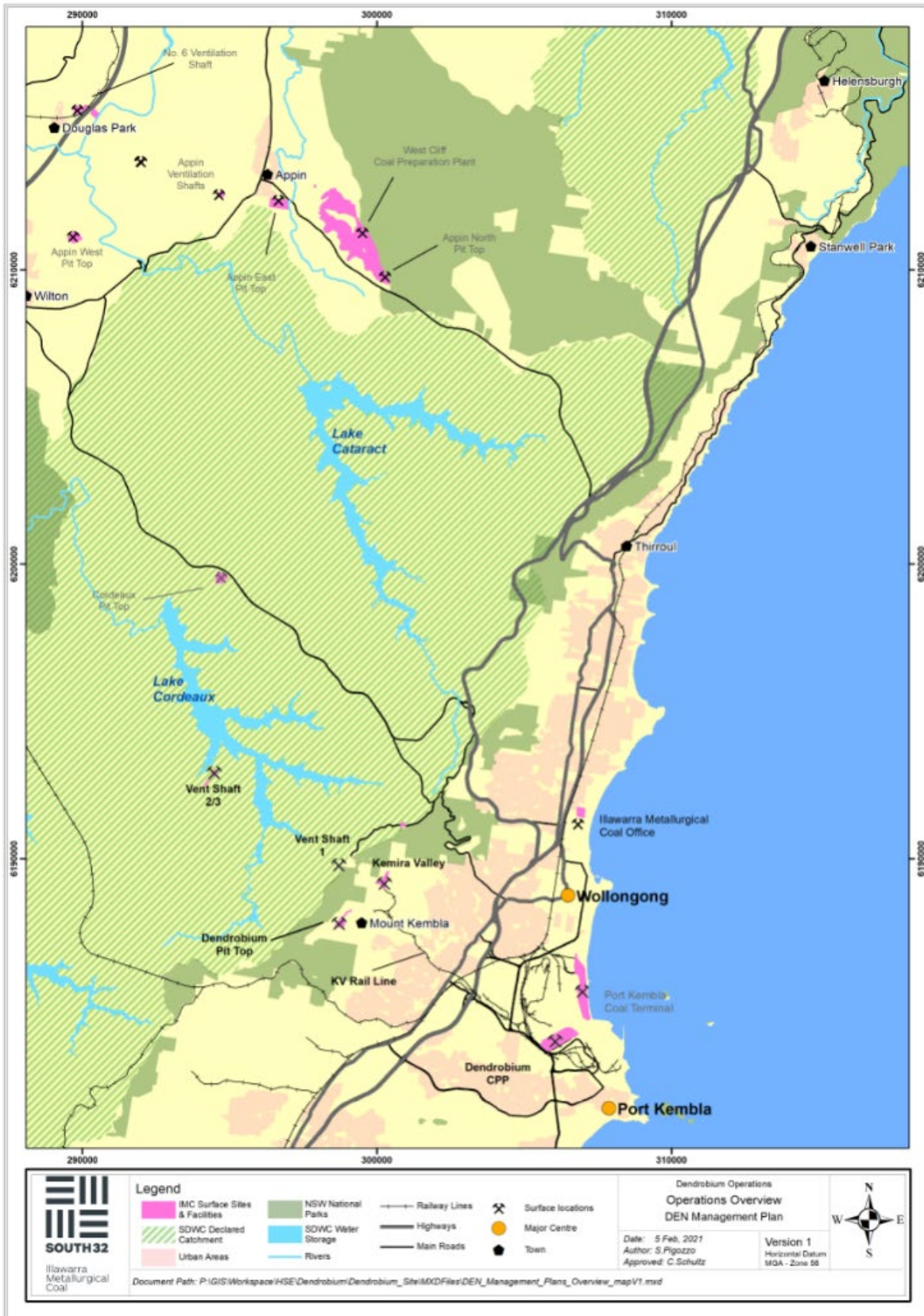
- Development Consent 60-03-2001, as modified
- EPL 3241
- Forbes Rigby Pty Ltd (2001) Traffic Impact Statement for Dendrobium Coal Project Illawarra Coalfields for Olsen Environmental Consulting on behalf of BHP Illawarra Coal
- Dendrobium Drivers Code of Conduct
- Handling Community Complaints, Enquiries and Disputes Procedure (IHP0112)
- Event Investigation Procedure (IMCP0098)
- Environmental Compliance/Conformance Assessment and Reporting Procedure (IMCP0186)
- ISO 14001:2015 Environmental Management Systems Standard
- Reporting and Investigation Standard (IMCSTD0069)
- Stones Road Maintenance Deed dated 28 August 2019
- Consequence Management Procedure (IHP0329)

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12. PLANS

Plan 1: Dendrobium Mine Locality Plan



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13. APPENDICES

Appendix 1: Consent Conditions: Traffic Management

Condition	Requirement	Section
Condition 7 of Schedule 2	The Applicant must only transport coal from the surface facilities by rail.	Section 5.1.2
Condition 4 of Schedule 4	<p>Continuous Improvement</p> <p>The Applicant must:</p> <p>(a) continue to investigate ways to reduce the noise generated by the development (including off-site road noise, noise and vibration impacts from the operation of the Kemira Valley rail line and maximum noise levels which may result in sleep disturbance);</p> <p>(b) continue to implement all reasonable and feasible best practice noise mitigation measures; and</p> <p>(c) report on these investigations and the implementation and effectiveness of these measures in the Annual Review, to the satisfaction of the Secretary.</p>	<p>Section 5.2.8</p> <p>Noise Management Plan</p> <p>Section 8.1</p>
Condition 25 of Schedule 4	<p>Road Transport</p> <p>The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval by 30 April 2009;</p> <p>(b) be prepared in consultation with the WCC, Mt Kembla Primary School and the CCC;</p> <p>(c) include traffic control measures for truck movements through residential areas, including Stones Road and its intersection with Cordeaux Road;</p> <p>(d) provide that mine shift changeover times and deliveries by heavy vehicle to the pit top facilities and KVCLF do not conflict with pick-up and drop-off times for Mt Kembla Primary School students;</p> <p>(e) provide heavy vehicle speed limits;</p> <p>(f) include a Driver's Code of Conduct to be applied to the Applicant's employees and contractors working at the development and measures for the enforcement of this code; and</p> <p>(g) include procedures for regular monitoring of compliance with this plan.</p>	<p>Date is in the past</p> <p>Appendix 3</p> <p>Section 5</p> <p>Section 5.2.4</p> <p>Section 5.2.3</p> <p>Section 5.2.3</p> <p>Section 6</p>

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	The Applicant must implement the Traffic Management Plan as approved by the Secretary.	
Condition 26 of Schedule 4	<p>Road Maintenance</p> <p>26. The Applicant must enter into an agreement with WaterNSW, to the satisfaction of the Secretary, to share the reasonable costs of maintenance of all access roads, bridges and creek crossings located on land controlled by WaterNSW and used by the Applicant.</p>	Section 5.2.2
Condition 27 of Schedule 4	The Applicant must establish an agreement with WCC to share the reasonable costs of maintenance of Stones Road for the life of the development. Prior to decommissioning of the mine, Stones Road must be inspected, to the satisfaction of WCC, and the road restored by the Applicant to a standard not less than its condition prior to the development's approval. If roadworks are not carried out by the Applicant within one month of being informed by WCC that these works are required under the maintenance agreement, WCC shall be entitled to carry out such maintenance work at the Applicant's cost. Any dispute over implementation of this condition is to be referred to the Secretary for resolution.	Section 5.2.2
Condition 2 of Schedule 8	<p>Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) a summary of relevant background or baseline data;</p> <p>(b) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</p> <p>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(d) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development; and</p> <p>(ii) effectiveness of the management measures set out pursuant to condition 2(c);</p>	<p>Section 4</p> <p>Section 3</p> <p>Section 5</p> <p>Section 6</p> <p>Section 8</p>

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	<p>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p>(ii) complaint;</p> <p>(iii) failure to comply with statutory requirements; and</p> <p>(h) a protocol for periodic review of the plan.</p>	<p>Section 5.2.8</p> <p>Section 7.2</p> <p>Section 5.2.8</p> <p>Section 8</p> <p>Section 7</p> <p>Section 8.3</p>
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Appendix 2: Dendrobium Drivers' Code of Conduct

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STANDARD					
SITE: Dendrobium			DEPARTMENT: Environment and Community		
DENDROBIUM DRIVERS' CODE OF CONDUCT					
ORIGINATOR: Amber Cleary		DENSTD0131			
AUTHORISER: Chris Schultz POSITION: Lead Environment					

1. PURPOSE

The Dendrobium Drivers' Code of Conduct is a requirement of the Dendrobium Mine Development Consent 60-03-2001. The aim of the Drivers' Code of Conduct is to minimise the impacts of traffic associated with Dendrobium Mine on local residents by reducing noise and limiting traffic, resulting in a safer traffic environment for the whole community. All employees, visitors and contractors engaged to work at Dendrobium Mine or Kemira Valley Coal Loading Facility are required to drive in a responsible manner and adhere to the requirements of the Drivers' Code of Conduct.

2. ALLOWABLE TRAVEL TIMES

NO VEHICLES (other than personnel passenger vehicles transporting people to/from and/or between the mine's workplaces) are to travel to or from the Dendrobium Mine Pit Top or Kemira Valley Coal Loading Facility through the area between the eastern end of the Village and the Dendrobium Pit Top entrance at the western end of the Village (the Curfew Zone) outside of the allowable travel times in the table below, except in cases of emergency. These hours also apply during school holidays. There are no allowable travel times on Sundays and Public Holidays.

Allowable Travel Times	
Monday to Friday	7.00 am – 8.00 am
	9.30 am – 2.30 pm
	4.00 pm – 5.00 pm
Saturday	8.00 am – 1.00 pm
For all enquiries contact Dendrobium Warehouse Coordinator on 4255 4445	

Personnel passenger vehicles are defined as vehicles used to transport people to and from work, including trades persons required to travel with their tools of trade in work vehicles to get to and from work. Although personnel passenger vehicles may travel through the Village outside of the allowable times, personnel are strongly encouraged to plan their work so travel is not required outside of the allowable times.

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Standard
Dendrobium Drivers' Code of Conduct

No 'B' Doubles are allowed to travel on Cordeaux Road at any time as a requirement of NSW Roads and Maritime Services (RMS).

3. RECORDING OF BREACHES

A 24-hour Community Call Line (1800 102 210) and email (illawarracommunity@south32.net) is in place for local residents to lodge complaints against any driver observed contravening this Code. All complaints are investigated, and disciplinary action may be taken. Breach notices may also be issued. Complaints pertaining to a breach of the Code are included in the complaints report published to South32's website - www.south32.net/our-business/australia/illawarra-metallurgical-coal/documents.

Event reports will be completed by Dendrobium Mine or Kemira Valley personnel where breaches of the Code have been identified.

4. PENALTIES FOR NON-COMPLIANCE

If a person or company is found to be acting contrary to this Code, disciplinary action may be taken. This will include, but not be limited to:

- 1st occurrence – warning letter.
- 2nd occurrence – warning letter and suspension of driver from site for a defined period.
- 3rd occurrence – final warning letter and review of the person's or company's continued working association with Illawarra Metallurgical Coal.

Note that these breach notices apply over a 12-month rolling period. Dendrobium Mine reserves the right to review a person's or company's continued working association with the mine following any breaches of the Code.

5. OTHER REQUIREMENTS

You **MUST NOT**:

- Drive to or from the Dendrobium Mine Pit Top or Kemira Valley Coal Loading Facility through the Curfew Zone outside of the allowable travel hours (unless in a personnel passenger vehicle).
- Bring oversize trucks with wide loads greater than 3.5 metres to any site without an appropriate escort vehicle.
- Exceed the maximum speed limits posted by the RMS on any roads (Note: the speed limit for all vehicles between the speed humps on Cordeaux Road is 40 km/hr at all times, not only during school hours).
- Exceed 40 km/hr on Cordeaux Road between the junction with Harry Graham Drive and the Rural Fire Service building at any time if driving a heavy vehicle.
- Exceed 40 km/hr along Stones Road at any time if driving a heavy vehicle.
- Overtake in awkward, inappropriate situations or where vision is limited.
- Throw rubbish out of your vehicle as you are travelling.

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Standard
Dendrobium Drivers' Code of Conduct

You **MUST**:

- Use defined routes and take extreme care along Cordeaux Road to the Dendrobium Mine site (from the Princes Highway) and Stones Road to Kemira Valley Site, particularly in narrow zones, on bridges, in residential areas and near the Mount Kembla Public School and Day Care Centre, and always be alert for pedestrians and cyclists. Do not deviate from these routes without prior approval.
- Stop at all designated stop signs along Stones Road to Kemira Valley.
- Hold a current and valid driver licence for the class of vehicle that you operate.
- Adjust your driving to the road conditions (slow down in wet conditions and on narrow roads).
- Demonstrate driver courtesy.
- Limit the use of compression braking (except where it is not safe to do so).
- Comply with the road rules pertaining to your vehicle, including use of mobile phones.
- Comply with site parking, speed limits and traffic management requirements.
- Drive in a manner that minimises vehicle noise.
- Ensure that loads are covered (where required), properly secured and no loose items can dislodge from trays.

The map provided on Page 4 of this document shows the location of the:

- Curfew Zone;
- designated transport routes;
- 40/km per hour zones on Stones Road and Cordeaux Road for heavy vehicles; and
- the high pedestrian activity area/School Zone.

6. REVIEW HISTORY

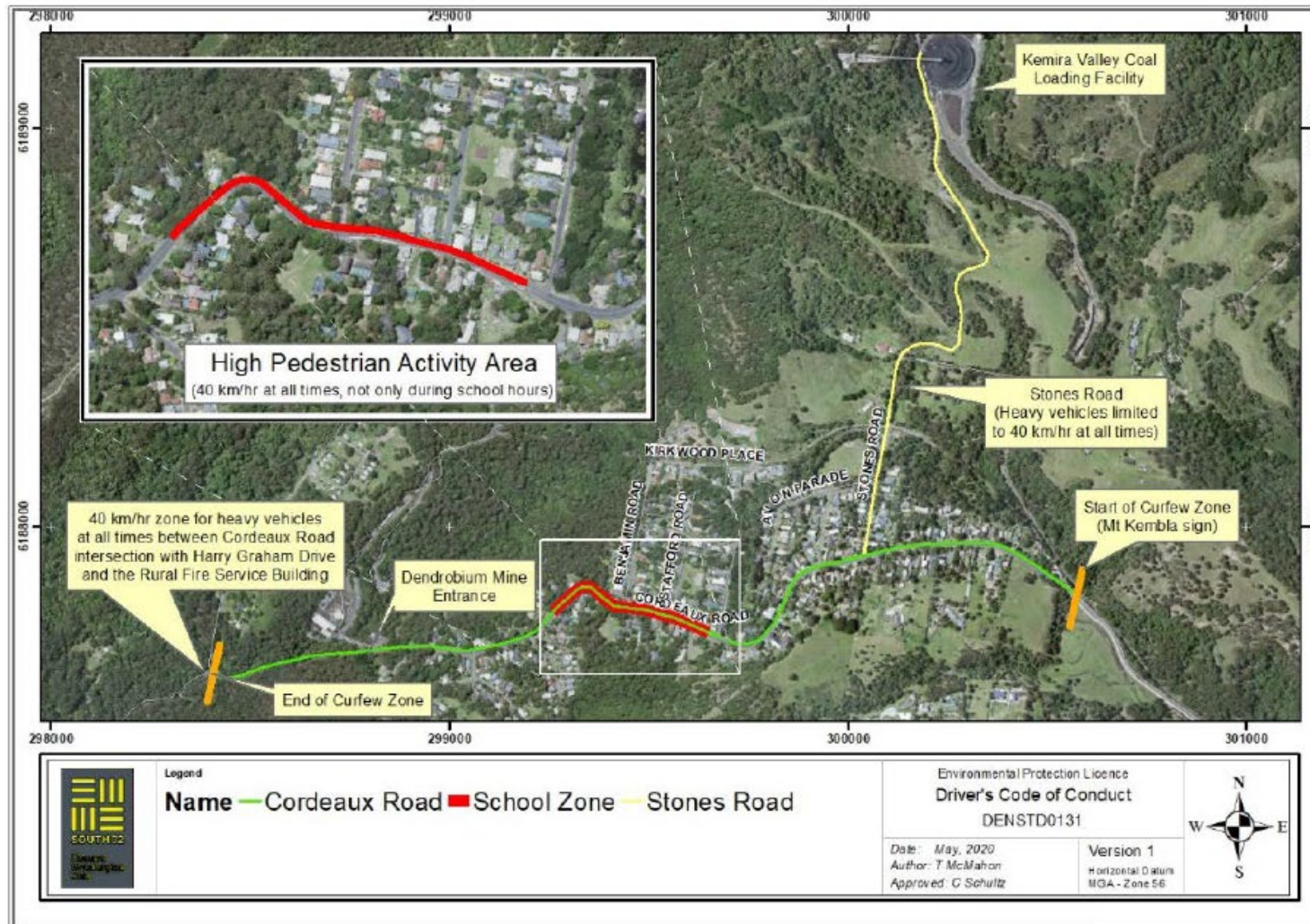
DATE	VERSION	BY	REASON
30/08/2018	6.0	Peter McMillan	New South32 format
15/05/2020	7.0	Chris Schultz, Tom McMahon, Amanda Blunt, Amber Cleary, Terry Lee	Updated to include feedback from community member

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**Standard
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Appendix 3: Stakeholder Consultation

Agency Comments	IMC Response
Wollongong City Council	
<p>Email received from WCC on 29 April 2021</p> <p>Thanks for the opportunity to review the Dendrobium Mine Draft Traffic Management Plan 2021.</p> <p>The Draft Traffic Management Plan has been reviewed by Council’s Development Engineering team and found to be satisfactory. No further comments are provided.</p>	<p>Noted</p>
Mt Kembla Public School	
<p>Email received from MKPS Principal on 19 April 2021</p> <p>I appreciated our meeting with IMC last term. Since the meeting I have read through the Traffic Management Plan and I don’t have anything to add at this time.</p>	<p>Noted</p>
Community Consultative Committee	
<p>Email received from CCC Chair on 28 April 2021</p> <p>The comments received from the CCC are as follows:</p> <ul style="list-style-type: none"> I don’t see mention of prohibition of parking on Cordeaux Road in the Drivers’ Code of Conduct. Whilst the TMP does state that employees and contractors are advised through pre-start shift communications, there is no suggestion of how frequently that reminder is given. The reason I mention it is that complaints of parking on Cordeaux Road are mentioned from time to time at DCCC meetings, so I wonder if there is a possibility that mine-related motorists forget or didn’t hear the instruction in the first place. 	<p>The DCOC requires personnel to comply with site parking requirements.</p> <p>The restriction relating to parking on Cordeaux Road and communication of this requirement has been included in Section 5.2.5 of the TMP.</p>

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Department of Planning, Industry and Environment	
<p><u>Approval received 29 May 2021</u></p> <p>The Department has carefully reviewed the document and is satisfied that it generally meets the requirements of the relevant conditions.</p> <p>Accordingly, the Planning Secretary has approved the Traffic Management Plan (Revision 6, dated April 2021). Please ensure that the approved plan is placed on the project website at the earliest convenience.</p>	<p>Noted</p>

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Appendix 4: Management Plan Approval



Chris Schultz
Superintendent Environment
Cordeaux Colliery
Picton Road
Mount Keira West, 2500

29/05/2021

Dear Mr Schultz

**Dendrobium Mine (DA60-03-2001-PA-78)
Traffic Management Plan**

I refer to the Traffic Management Plan submitted in accordance with Condition 25, 26 and Condition 27 of Schedule 4 of the Condition of Consent for the Dendrobium Mine (DA60-03-2001-PA-78).

The Department has carefully reviewed the document and is satisfied that it generally meets the requirements of the relevant conditions.

Accordingly, the Planning Secretary has approved the Traffic Management Plan (Revision 6, dated April 2021). Please ensure that the approved plan is placed on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Charissa Pillay on 02 99955944.

Yours sincerely

Stephen O'Donoghue
Director
Resource Assessments
As nominee of the Planning Secretary

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