



Our ref: STH22/00009
Contact: Maurice Morgan

17 February 2022

Department of Planning, Industry & Environment
By Email: information@planning.nsw.gov.au

Contact Name: Iwan Davies

SSI-9172452 – PROJECT ENERGYCONNECT (NSW - EASTERN SECTION)

I refer to your correspondence regarding the subject Application which was referred to Transport for NSW (TfNSW), for assessment and comment.

The application for the proposed development is supported by an Environmental Impact Statement (EIS) prepared by TransGrid dated January 2022 and a Traffic Impact Assessment (TIA) prepared by WSP dated December 2021.

From the submitted information it is understood that the development involves the construction and operation of a mix of new 330kV and 500kV transmission lines for a length of approximately 540 kilometres between the Buronga and Wagga Wagga substations, an upgrade and expansion of the existing Wagga Wagga substation and the construction of a new Substation (Dinawan Substation) to the south of Coleambally and associated works.

The proposal includes the establishment of six main construction compounds and accommodation camp sites in Balranald, Booroorban, Dinawan, Lockhart and Wagga Wagga. The proposal also includes the removal and re-instatement of the temporary construction compounds and associated works.

From the information provided the proposed route for the transmission lines will traverse multiple public roads including 5 classified “state” roads – Sturt Highway, Yanga Way, Cobb Highway, Newell Highway and Olympic Highway and a number of classified “regional” roads. The proposed development also requires access and works across the Country Rail Network. Key railway line crossings include;

- Moama Balranald Railway, about 25 kilometres south of Balranald (non-operational),
- Narrandera Tocumwal Railway, near the intersection of Colombo Road and Crutchs Road, Bundure (non-operational)
- The Rock Oaklands Railway, about nine kilometres northeast of Urana (non-operational)
- The Rock Oakland Railway, around two kilometres southeast of Lockhart (operational)
- Main Southern Railway, around three kilometres southwest of Uranquinty (operational).

TfNSW emphasises the need to minimise the impact of development on the existing public road and rail network and maintain the level of safety, efficiency and maintenance along the road network. As the proposed development has frontage/access to the classified road network and the rail network the proposed conditions are appropriate for safety and network efficiency reasons.

Of particular interest to TfNSW is the proposed sites for the construction compounds and the workers camps, the haulage routes for the large components and the proposed methodology for the stringing of the lines over public roads and rail corridors.

TfNSW has completed an assessment of the application, based on the information provided and focussing on the impact to the state road network. TfNSW notes and provides the following comments for consideration:

Section 8 of the TIA and table 19-2 of the EIS outlines mitigation measures that propose to address road and transport related matters generation by the project. Access driveways to the classified road network shall be kept to a minimum and any access tracks to the road network that are not required for operational purposes should be required to be removed at the completion of the construction phase for road safety reasons to remove unnecessary conflict points along the network.

TA15 should be altered to read as “All required temporary access tracks shall be located and constructed in accordance with Austroads Guide to Road Design. Proposed access tracks to the road network shall be constructed only where there are no practical existing access driveways and in consultation with the relevant landholder. All new access tracks not required for operational access shall be removed at the completion of the construction phase of the project within that locality”.

The TIA advises that all site access intersections have been assessed in accordance with Austroads guide to Road Design. Section 5.1.5 of the TIA advises that the intersection treatments servicing the accommodation and construction compound sites shall be a Basic Right Turn (BAR)/Basic Left Turn (BAL) intersection treatment as a minimum. TfNSW understands that the Dinawan Substation to be located with frontage and access to the Kidman Way south of Coleambally is proposed as a permanent facility whereas the compound sites and workers camp sites are temporary.

As a minimum driveways to the classified road network for the construction compounds, workers camps and substations shall be designed and located in accordance with the Austroads Guide to Road Design for the posted speed limit with a minimum width to accommodate 2 way movement of the largest vehicles likely to access that driveway and be sealed for at least 10 metres from the edge of seal of the carriageway. Any gates to these sites shall be located a minimum of 40 metres from the edge of seal of the carriageway of the road. The intersection treatments and driveways for these temporary sites shall be removed when these become redundant.

A Works Authorisation Deed (WAD) is required for the delivery of new driveways where an intersection treatment (eg Basic Right Turn (BAR)/Basic Left Turn (BAL)) is required on the classified “state” road network. TfNSW requires that the Traffic Management Plans (TMP) required for the construction of the driveway access and intersection treatment be retained and implemented for the duration of the occupation of the accommodation and construction compound sites.

A section 138 approval is required from the relevant road authority (Council) for works within the road reserve including driveway works and the stringing of lines across the road reserve. For classified roads concurrence is required from TfNSW before the approval can be granted. Any works that occupy part of a travel lane or disrupt traffic flow on a classified Road will also require Road Occupancy Licence.

TfNSW is the rail authority of the Country Rail Network (CRN) across NSW and the Transport Asset Holding Entity (TAHE) is a State – owned corporation that holds rail property assets and rail infrastructure, including the CRN. As of 29 January 2022, UGL Regional Linx (UGLRL) has been appointed by TfNSW to manage the CRN and will be responsible for reviewing and providing advice regarding potential impacts to the CRN.

The TIA indicates that further consultation is proposed with the relevant road authority for the stringing of transmission lines over roads. TfNSW notes that the stringing of transmission lines will occur over railway tracks (lines) would be limited and would only occur during scheduled rail maintenance periods (such as rail possessions) or scheduled as to not impact passenger or freight services. The EIS contains a proposal that requires access to the Country Rail Network (CRN) in particular, Options A and B (page 46 of the EIS) for a transmission line 99A at Lockhart.

Any works that requires access to any part of the rail land within the Country Rail Network is prohibited unless it is permitted to do so in advance. The Proponent is required to consult UGLRL's Third Party Works team in order to access the CRN via thirdpartyworks@uglregionallinx.com.au to obtain written confirmation and satisfy requirements by UGLRL on behalf of Transport for NSW.

The documentation identifies 4 sea ports (ports of Newcastle, Kembla, Adelaide and Melbourne) and lists 4 potential haulage routes depending on the port of origin of the components. Section 19.4.1.2. of the EIS refers to Oversized and Overmass (OSOM) vehicles. This section identifies that the specific details of vehicle types and route options would be confirmed during detailed construction planning and a permit to operate OSOM vehicles on the road network would be obtained by the construction contractor from the National Heavy Vehicle Regulator, where required. OSOM Permits would be required if the vehicle combination does not comply with a mass, dimension or operating requirements set out in a gazette notice. Section 6.11.3.3 of the EIS refers to A-Double truck movements. Note that not all of the identified haulage routes from the ports to the construction site are approved for A-Double heavy vehicles.

The submitted documentation identifies the number and size of the OSOM vehicles required to deliver components, including substations and the proposed haulage route from 4 potential ports of origin. However it fails to provide details of swept paths of the OSOM vehicles, any potential pinch points or height limitations along the routes or any required specific mitigation measures. More detailed information is required to allow for an informed assessment of the potential impacts of the haulage of the components on the road network. When the preferred haulage route is selected a full and independent risk analysis and inspection of the route may be required to be prepared and supplied for comment. Further analysis and reporting to assess possible damage to, and repair of the route will be required on a regular basis.

The TIA advises that recommended mitigation measures have been provided so that the safety and efficiency of the transport network in the proposal area is maximised throughout all phases. The TIA advises that measures would be further developed and implemented in communication with the government road authorities, stakeholders and the general public. These measures include:

- the preparation of a Traffic and transport management sub-plan, which outlines the strategy and procedures to minimise, mitigate and communicate the impacts of the construction of the proposal. These impacts include changes to the road capacity, traffic performance and road safety of the local transport network and traffic systems
- undertaking community communication to inform and engage with the community during construction. All affected communities and public bodies will be notified in advance of any disruptions to the transport network. This may be in the form of variable message signs, website notices, public notices in local publications and personal correspondence
- preparing and obtaining Road Occupancy Licences (ROL)
- the preparation of a Vehicle Movement Plan (VMP) and Driver Fatigue Management Plan to reduce the risk of accidents during the long distance travel required for transportation of materials and equipment
- road condition surveys to assess the existing road surfaces that construction/maintenance vehicles would traverse. Transgrid will work with stakeholders to mitigate impacts; and
- determining alternate arrangements for public transport services in the event that construction activities disrupt bus movements.

Further to the above a plan shall be prepared in consultation with the relevant road authorities to outline measures to manage the movement of workers to the project site to address fatigue related issues. The plan is to provide initiatives to reduce traffic commuting to the development site by facilitating shuttle bus services. The plan is to include regular consultation with Council, Transport for NSW and NSW Police to address commuter traffic and commuter traffic related incidents on public roads.

Any Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Transport for NSW) to outline measures to manage traffic associated with the construction and operation of the development including the movement of plant and components to the site. The Traffic Management Plan for the movement of oversize plant to the site shall involve the appointed transport contractor. The plan shall focus on the management of traffic generated by the development, the potential impacts, the measures to be implemented to mitigate traffic generated issues, and the procedures to monitor and ensure compliance. It shall address, but not necessarily limited to;

- i) measures to be employed to manage the movement of construction and worker vehicles to the site to limit disruption to other motorists, emergency vehicles and school bus timetables
- ii) precautionary measures such as signage to inform other road users of the construction activities for the project,
- iii) Details of traffic routes to be used by heavy vehicles associated with the project, including any necessary route or time restriction for oversized vehicles,
- iv) the details of any oversize and overmass haulage, including exact transport routes, road-specific mitigation measures, haulage timing, etc and any special permits required to be obtained,
- v) measures to maximise the use of a low frequency (regular) trucking schedule rather than intermittent high frequency (campaign) trucking schedule to minimise convoys or platoons,
- vi) Proposed hours for construction and plant movement activities,
- vii) any required changes to the existing road environment along the proposed routes such as intersection upgrade, road widening, temporary street closures, removal and replacement of road infrastructure, etc, and
- viii) contingency plans to address disruptions to haulage due to low visibility eg heavy rain periods, fog etc or closure of the haulage route,
- ix) a Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc and appropriate penalties for infringements of the Code,
- x) appropriate vehicle maintenance and safety,
- xi) emergency response plans,
- xii) procedures for informing the public where any road access will be restricted as a result of the project,
- xiii) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements, and
- xiv) procedures to provide for training and compliance with and enforcement of the plan.

Transport for NSW has assessed the Development Application based on the documentation provided and would raise **no objection** on the basis that the Consent Authority ensures that the development is undertaken in accordance with the information submitted subject to the issues outlined above being addressed.

TfNSW highlights that in determining the application it is the consent authority's responsibility to consider the environmental impacts of any road works which are ancillary (proposed or deemed necessary) to the development. This may include the need for further environmental assessment for any ancillary road works.

Any enquiries regarding this correspondence may be referred to Maurice Morgan, TfNSW (South Region), phone (02) 6923 6611.

Yours faithfully



Maurice Morgan
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