29/03/2022

WST22/00039/01 SF2022/058116

The Manager
Resource and Energy Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Attention: Javier Canon

Dear Javier Canon

SSD-12346552: Review of Environmental Impact Statement – Great Western Battery Energy Storage System

Thank you for the request for review of the Environmental Impact Statement (EIS) for the Great Western Battery Energy Storage System development (SSD-12346552) via the Major Projects Planning Portal on the 2 March 2022.

From review of the EIS Transport for NSW (TfNSW) notes the development will involve:

- The construction, operation and maintenance of a 500MW Battery Energy Storage System (BESS) at Lot 4 DP751651. The site is located approximately 1.25km northwest of the Transgrid Wallerawang 330kV Substation.
- Connections between the BESS and the Wallerawang 330kV substation, the proposed underground transmission line would be located to the east of Brays Lane as well as within the existing rail corridor, it would exit the rail corridor to connect to the Transgrid Substation.
- Delivery, installation and electrical fit-out for the Project, including battery enclosures, invertors, transformers and associated cabling and infrastructure.
- Ancillary elements including site access from the Castlereagh Highway, internal access roads and parking, site office and amenities, stormwater and fire management infrastructure, utilities, signage, fencing, security systems and landscaping.
- The Main Western Railway Line runs south of the Project Site.
- Access to the site would be via an existing access from the Castlereagh Highway.
- Subdivision of Lot 4 DP751651 to separate the existing residence in the southeast portion of the lot from the proposed BESS (Attachment 1). During operation lot 5 would be used for operation of the BESS and lot 4 would continue to be used for rural residential purposes.

Based on a review of the EIS and the supporting information for the development, TfNSW has identified that the additional information shown in Attachment 2 is required to continue the assessment of the development.

TfNSW is the rail authority of the Country Rail Network (CRN) across NSW and 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 is responsible for reviewing and providing comments on this development to ensure potential impacts to rail operations (current and future) is considered

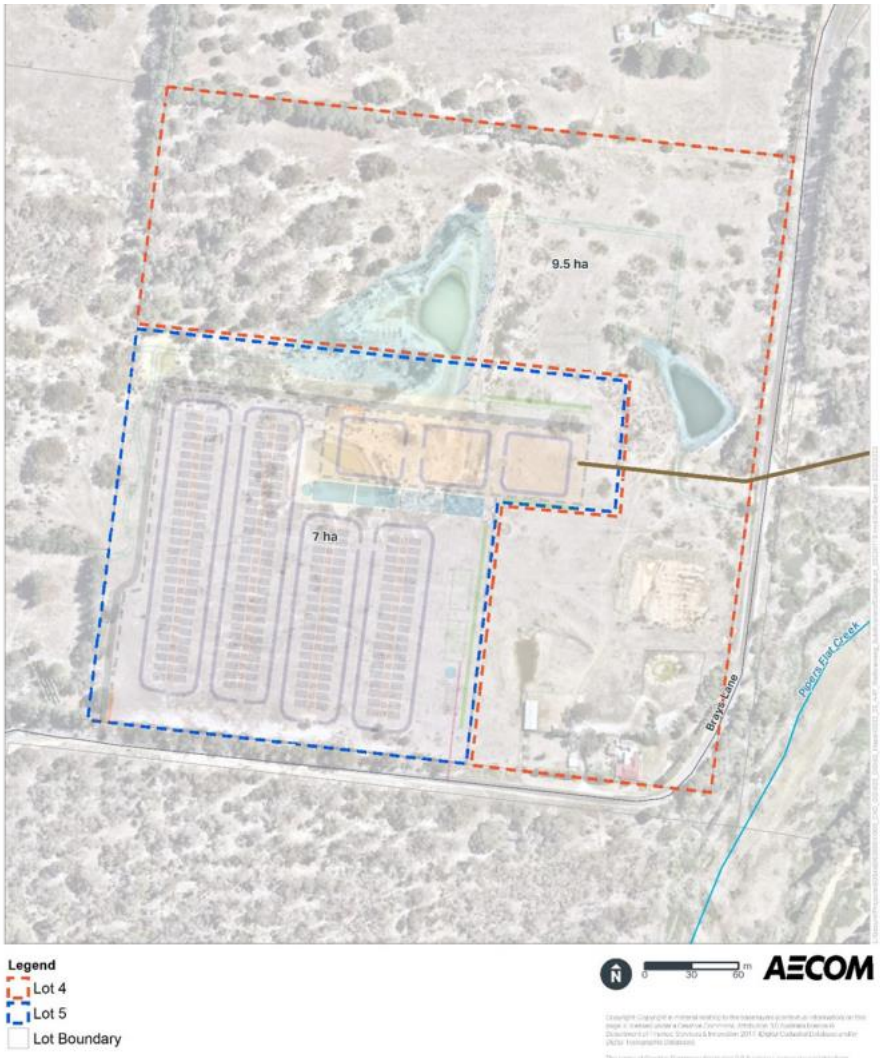
and addressed. Comments in relation to addressing clause 2.97 and 2.98 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* are provided in Attachment 3.

Please ensure that any further email correspondence is sent to development.western@transport.nsw.gov.au. If you wish to discuss this matter further, please contact Hayley Sarvanandan on 02 9983 2372. Please note I will be on maternity leave from 8 April 2022, from this date please email the development west inbox.

Yours faithfully

Alexandra Power
Team Leader Development Services
Development Services West
Regional and Outer Metropolitan

Attachment 1



1. Traffic Impact Assessment

   Limited information is provided in relation to OSOM, heavy and light vehicle routes apart from the proposed access points to the site from the Great Western Highway and Castlereagh Highway. Clarification is required on the proposed routes to and from the site for construction vehicles, i.e., where will construction materials and equipment be sourced, details are required on the proposed origin to destination routes.

   Notes:

   - Consideration should be given to the timing and impacts of the works occurring as a part of the demolition of the Wallerawang Power Station on the proposed scheduling of the works proposed of the Great Western BESS.

2. Access Locations

   TfNSW notes the following access points to the site are proposed for construction traffic:

   - Castlereagh Highway/Brays Lane (light vehicle access)
   - Great Western Highway/Barton Avenue (light and heavy vehicle access)
   - Castlereagh Highway/Main Street (OSOM, heavy and light vehicle access)

   The construction period is expected to take 12 months to complete. Peak construction period (approx. 2 months) is expected to generate up to 50 light vehicles and 20 heavy vehicles per day (140 trips). TfNSW notes both Castlereagh Highway/Main Street and Great Western Highway/Barton Avenue intersections provide existing CHL/CHR treatments. TfNSW raises concern regarding increasing the intensity of traffic at the Brays Lane/Castlereagh Highway intersection due to available sight distance approaching Brays Lane from both the north and south coupled with the existing layout i.e., lane length for through vehicles to pass right turning vehicles. In this regard the following matters need to be addressed:

a) Scaled plans are required to demonstrate sight distance is available at the intersection, a design speed of 90km/h needs to be adopted (refer to Table 3.2 of *Austroads Guide to Road Design Part 4A*). Sight distance diagrams need to be provided using an eye height of 1.1m and a vehicle height of 1.25m showing the sight distance available both horizontally and vertically in accordance with Fig 3.2 *Austroads Guide to Road Design Part 4A*, the plan must demonstrate any landscaping and/or fencing will not compromise sight distance.

b) A traffic analysis needs to be undertaken to identify an appropriate treatment for the intersection of the Castlereagh Highway and Brays Lane. The treatment type is to be determined based on the warrants for BA, AU and CH Turn Treatments outlined in *Austroads Guide to Road Design (AGTRD) Part 6: Intersections, Interchanges and Crossings Management (Figure 3.25).*

Notes:

- The analysis needs to be supported with current traffic count data, with turn movement diagrams at the intersection for the AM and PM peak hours separating light and heavy vehicles.
- Assumptions for traffic generation should be in accordance with RTA Guide to Traffic Generating Developments and associated updated surveys or appropriate justified.
- Distributions to and from the development need to be justified.
- Volume plots on Figure 3.25 need to be provided to identify the appropriate turn treatments.

- Section 5.1.1 suggests using shuttle buses to reduce traffic volumes, TfNSW requires a worst-case scenario to be demonstrated until a commitment is made to using shuttle buses and information is provided on routes, volumes and if they will operate in the peak hours.

c) A strategic design for the determined access treatments/upgrades needs to be prepared to clarify the scope of works, demonstrate a compliant design can be constructed within the road reserve and allow the consent authority to consider any environmental impacts of the works. These impacts include traffic and road safety impacts as well as other impacts such noise, flora and fauna, heritage and impact to community (see Attachment 4 for further information).

Attachment 3

1. Contamination of Land

Comment
The EIS identifies the existing rail corridor may have potential for the presence of trace contaminants from the historic operation of rail activities and the potential presence of imported fill. Imported fill has potential to contain contaminated materials. The Applicant seeks to provide prior to construction, soil samples where trenching is proposed and test for contaminants of potential concern to determine presence and whether contamination levels pose a health risk to construction workers.

TfNSW is currently conducting an environmental assessment to identify contamination on the CRN and is committed to ensuring the health and wellbeing of the community, TfNSW is not aware whether there are contaminants found in the rail corridor or on the common boundaries. The transmission line would be installed underground using a combination of trenching and underboring methodologies to traverse across the rail corridor.

Recommendation
The Applicant is requested to provide a Preliminary Contamination Report during Response to Submissions (RtS) stage to confirm the presence of any contamination that may be present within the rail corridor. The Applicant is required to contact UGLRL's Third party works team to arrange for access to the rail corridor to undertake investigations via thirdpartyworks@uglregionallinx.com.au

2. State Environmental Planning Policy (Transport and Infrastructure) 2021

Comment
The EIS identifies that Section 2.97 and 2.98 of the *SEPP (Transport and Infrastructure) 2021* apply (previously Clauses 85 and 86 of the ISEPP 2007) and has not provided an assessment against the proposal and its impacts to the rail corridor.

Recommendation
The Applicant is requested during Response to Submissions (RtS) stage to provide an assessment of the proposal to address Section 2.97 and 2.98 of the *SEPP (Transport and Infrastructure) 2021*.

3. Landowners Consent

Comment
The EIS identifies that landowner's consent from TfNSW is expected to be received during exhibition of the EIS. Further information is required to determine if this landowner's consent includes lodgement and/or construction works within the rail corridor.

Recommendation
The Applicant is requested to confirm if landowner's consent from Transport Asset Holding Entity (TAHE) for the rail corridor has been attained for lodgement and to carry out works within the rail corridor. For landowner's consent to support lodgement within the rail corridor, the Applicant is requested to contact Joanne Cheoung via joanne.cheoung@uglregionallinx.com.au to coordinate. Additionally, landowner's consent to carry out works (construction of the transmission line) within the rail corridor will require UGLRL's Third Party Works Team and TAHE approval. The Applicant is requested to contact the team via thirdpartyworks@uglregionallinx.com.au

Attachment 4

See Separate Attachment