

14/04/2022

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

Attention: Philip Nevill

Dear Mr Nevill

SSD-5251: TfNSW response to Dubbo Project for Mod 1- Project layout and processing changes

Thank you for referring SSD-5251 Dubbo Project for Mod 1- Project layout and processing changes via the Major Projects Portal on the 30 of March 2022 as a part of the public exhibition process.

TfNSW have reviewed the proposed modification 1 to SSD-5251 the Dubbo Project and understand that the modification involves the following changes:

Construction and operation:

- a Chlor-alkali Plant for the production of hydrochloric acid and sodium hydroxide for use in on-site processing operations;
- a brine concentrator to maximise water recovery; and
- a conveyor between the Processing Plant and Administration Area and the Salt Encapsulation Cells.

Relocation of:

- The Salt Encapsulation Cells from the approved location southwest of the Open cut to the approved location of the Liquid Residue Storage Facility Area 3;
- the Solid Residue Storage Facility from the approved location west of the Waste Rock Emplacement to the approved location of the Liquid Residue Storage Facility Area 5; and
- the Rail Container Laydown and Storage Area from the approved location to an area immediately to the west of the approved location.
- Reclassification of various approved disturbance areas to permit alternate uses.
- Realignment of sections the approved Macquarie River Water Pipeline, located entirely within the Project Site.
- Extended construction hours for non-linear infrastructure to 24-hours per day, seven days per week.
- Extension of the Project life by eight years from 31 December 2037 to 31 December 2045.

Realignment of:

- A section of the approved 132kV Electricity Transmission Line.
- The approved gas pipeline to remove the pipeline from the Dubbo – Molong Railway corridor.

TfNSW have reviewed the modification report and associated appendix for the proposed Dubbo Project- Modification 1 and require the following additional information to continue TfNSW

assessment of the impacts to the road network associated in relation to the proposed modifications to the project:

- TfNSW requests that a Traffic Impact Assessment (TIA) be prepared by a suitably qualified person in accordance with the *Austroads Guide to Traffic Management Part 12*, the *Roads and Maritime Supplements to Austroads* and the *RTA Guide to Traffic Generating Developments*. The TIA is to address the following.
- Project schedule:
 - Hours and days of work, number of shifts and start and end times,
 - Phases and stages of the project, including construction, operation and decommissioning,
- Traffic volumes:
 - Existing background traffic,
 - Project-related traffic for each phase or stage of the project,
 - Projected cumulative traffic at commencement of operation, and a 10-year horizon post-commencement,
- Traffic characteristics:
 - Number and ratio of heavy vehicles to light vehicles,
 - Peak times for existing traffic,
 - Peak times for project-related traffic including commuter periods,
 - Proposed hours for transportation and haulage,
 - Interactions between existing and project-related traffic,
- A description of all over size and over mass vehicles and the materials to be transported
- The origins, destinations and routes for:
 - Commuter (employee and contractor) light vehicles and pool vehicles,
 - Heavy (haulage) vehicles,
 - Over size and over mass vehicles,
- Road safety assessment of key haulage route/s (including crash history)
- The impact of the changes to the traffic generation on the public road network and measures employed to ensure traffic efficiency and road safety during construction, operation and decommissioning of the project,
- Assessment of the changes to the traffic generation at the key intersections with the state classified road network due to the proposed changes identified within this modification such as the increase in the construction workforce and the modifications identified above and within section 1.1 Scope of the Modification Report.
- The peak construction workforce based on the construction scheduling inclusive of should be identified (for light and heavy vehicles), include the traffic distribution (light and heavy vehicles) and the AM/PM peaks (cumulative for the light and heavy vehicles) turning at each intersection with the classified road network should be identified.
- An assessment of the warrants for turn treatments on unsignallised major roads as per Figure 3.25 of *Austroads Guide to Traffic Management Part 6: Intersections, Interchanges and Crossings Management* is required to be prepared for each key intersection with the state classified road network and will need to take into account the matters identified in the above point and additionally identify the AM/PM background traffic generation along the classified road network. Strategic concept designs for any intersection upgrades to the state classified road network will be required to accompany the TIA. The strategic concept designs will need to be prepared in accordance with the separately attached strategic design requirements for DAs face sheet.

- Proposed road facilities, access and intersection treatments are to be identified and be in accordance with Austroads Guide to Road Design including provision of Safe Intersection Sight Distance (SISD),
- Local climate conditions that may affect road safety during the life of the project (e.g. fog, wet and dry weather, icy road conditions),
- The layout of the internal road network, parking facilities and infrastructure,
- Impact on rail corridors and level crossings detailing any proposed interface treatments,
- Impact on public transport (public and school bus routes) and consideration for alternative transport modes such as walking and cycling,
- Identification and assessment of potential impacts of the project, such as blasting, lighting, visual, noise, dust and drainage on the function and integrity of all affected public roads,
- Controls for transport and use of any dangerous goods in accordance with *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*, the *Australian Dangerous Goods Code* and *Australian Standard 4452 Storage and Handling of Toxic Substances*,
- Propose a Traffic Management Plan (TMP) to be developed following approval of the EIS, in consultation with relevant Councils and TfNSW. The TMP would need to identify strategies to manage the impacts of project related traffic, including any community consultation measures for peak haulage periods and a Driver Code of Conduct.

In relation to the rail component, 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 to ensure any potential impacts to rail corridors are considered and addressed.

The site is within and immediately adjacent to the non-operational rail corridor from Dubbo to Molong. TfNSW has reviewed the submitted information and requests additional information in relation to the rail corridor to be provided during Response to Submissions (RtS) stage in order to continue assessment, as outlined under **TAB A**.

Once the Applicant has addressed the issues outlined during the response to submissions stage, TfNSW will provide recommended conditions to DPE.

If you wish to discuss this matter further, please contact Serena Li to discuss the rail corridor impacts via Serena.Li2@transport.nsw.gov.au and Alexandra Power for the road related matters via development.western@transport.nsw.gov.au

Yours faithfully



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

TAB A Additional Information to address impacts along the Country Rail Network

The modification application seeks approval for construction and operation of a range of additional plant, the relocation and realignment of a range of approved Project components, an increase on the approved reagent transportation rate and an extension of the life of the project on the Land (delineated in blue in Figure 1) which is within and immediately adjacent to the non-operational rail corridor from Dubbo to Molong.

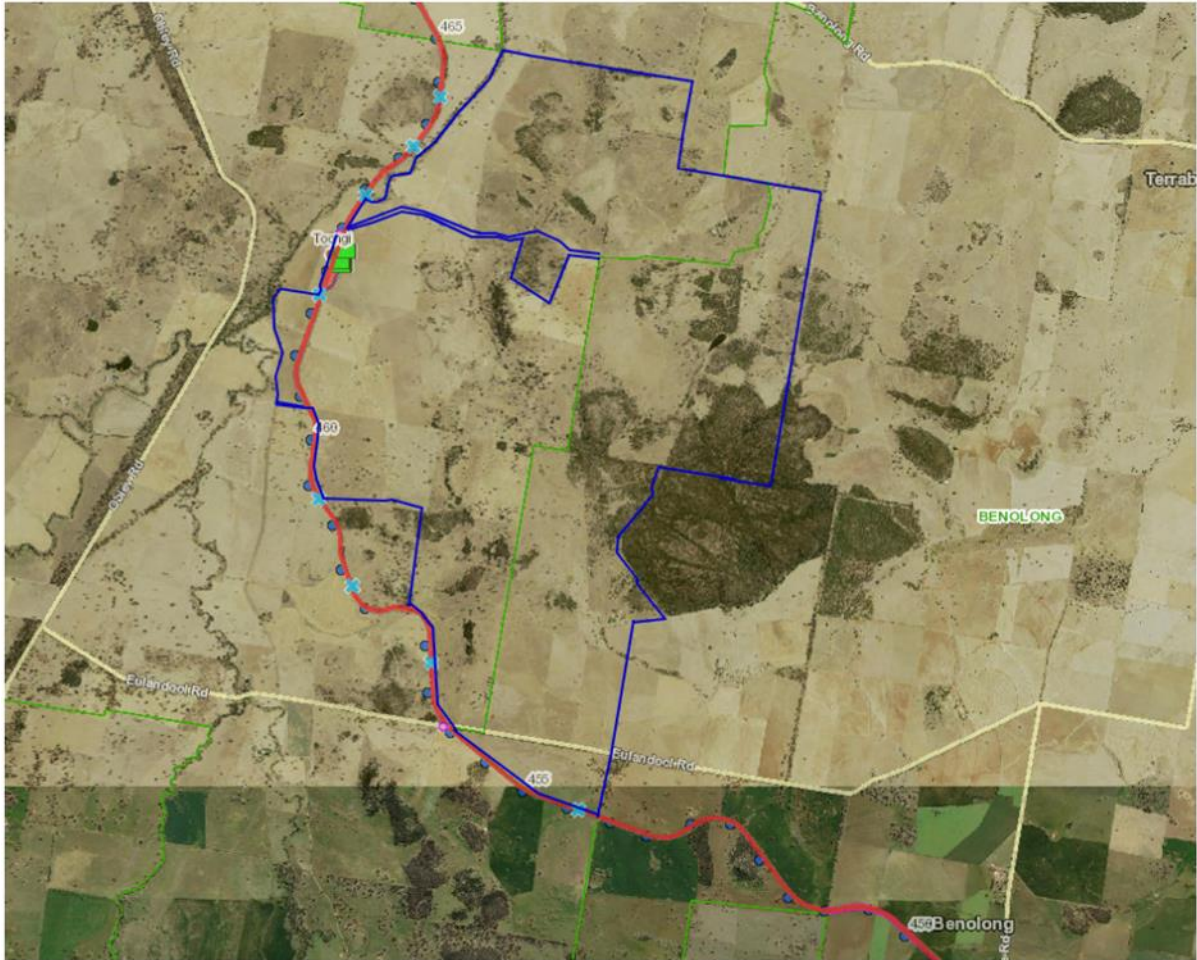


Figure 1: Project Site and Rail Corridor

Excavation in, above, below or adjacent to rail corridors

Comment

The proposal seeks constructions works for a processing plant, administration area, construction of Chlor-alkali plant, the rail container Laydown and storage area, which appears to involve the penetration of ground. No further design details are provided to address Section 2.98 of the *State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021* (previously Clause 86 of the ISEPP 2007) to confirm if there will be excavation greater than 2m in depth within 25m of the rail corridor.

Recommendation

The Applicant is requested to address the matters outlined in Section 2.98 of the SEPP (Transport and Infrastructure) 2021 applies. If the matters are relevant, the Applicant will need to contact TfNSW to ascertain the documentation requirements that will need to be addressed as part of the response to submissions.

Stormwater Management

Comment

Stormwater management and documentation has not been provided in this modification application to confirm if there will be any stormwater discharge into the rail corridor as a result of this modification application.

Recommendation

The Applicant is requested to confirm if there will be any stormwater discharge into the rail corridor during RtS stage and provide additional design documentation and calculations to confirm post development flows to not exceed pre-development flows (if required).

Reopening of Toongi Line for Option A

Comment

The Modification Report indicates that the Applicant elected Option A – Rail (to Toongi) and Minor Road as its transportation following completion of a review of transport options in consultation with relevant government agencies and infrastructure managers in accordance with condition 42 of Development Consent to SSD 5251. As of 29 January 2022, UGL Regional Linx (UGLRL) is the Rail Infrastructure Manager (RIM) appointed to manage the CRN on behalf of TfNSW. It is understood that discussions have been held with TfNSW on the feasibility of reopening the railway line to allow Transportation Option A.

Recommendation

The Applicant is requested to provide UGLRL as the rail infrastructure manager for the CRN on behalf of TfNSW with documentation demonstrating that UGLRL (or the previous RIM – John Holland Rail) has been consulted for Option A and provide documentation demonstrating consultation with JHR or TfNSW in respect of the movement of trains and upgrades of the Molong to Dubbo rail line from Dubbo to Toongi in accordance with condition 43 of Development Consent to SSD 5251.

Please forward these documents to Andrew Burton for review via andrew.burton@uglregionallinx.com.au

Landowner's consent

Comment

A portion of the site is within the Corridor Land that is owned by Transport Asset Holding Entity (TAHE). There is an existing lease between TfNSW and the Applicant including an access and compensation deed. The access and compensation deed does not grant consent for other activities on or under the Corridor Land without TfNSW's prior written consent. Landowner's consent has not

been provided from TAHE to support lodgment of this modification and evidence is requested.

Recommendation

The Applicant is requested to provide evidence if it has obtained landowner's consent for the purpose of lodgment of this modification. To arrange for landowner's consent from TAHE, please contact Andrew Burton from UGLRL to coordinate between the Applicant and TAHE via andrew.burton@uglregionallinx.com.au