



**Transport
for NSW**

Sally Munk
Industry Assessments
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Munk

Deniliquin Ethanol Plant SSD 13_6281

Transport for NSW (TfNSW) has been made aware of the public exhibition of the subject proposal at Deniliquin and would like to provide a submission on the proposal.

Roads and Maritime Services will be providing a separate response.

TfNSW has reviewed the documentation submitted in support of the proposal and it is recommended that further information and assessments should be undertaken in relation to the freight transportation impacts of the proposal as outlined at **TAB A**.

It is recommended that the matters should be addressed and the Environmental Impact Statement revised accordingly.

Thank you again for the opportunity of providing advice for the subject proposal. If you require clarification of any issue raised, please don't hesitate to contact Mr Edmond Platon, Transport Planner on 02 8202 2557 or at edmond.platon@transport.nsw.gov.au.

Yours sincerely

12/11/15

Mark Ozinga
**Principal Manager Land Use Planning & Development
Transport Strategy**

CD15/19331

TAB A

The following issues in relation to freight transportation should be addressed and updated in the Environmental Impact Statement (EIS) accordingly:

- Further clarification should be provided on how the proposal will achieve the estimated 70% rail mode share for inputs and outputs given that:
 - There is no rail connection from Deniliquin to the grain growing areas of the south western plains of NSW.
 - There is no direct rail connection to the NSW or Queensland rail networks from Deniliquin which the EIS identifies as key ethanol destinations due to the ethanol mandates in these states.

Details should be provided in the EIS on the locations of grain sources and ethanol destinations that would be accessed by rail (i.e. 70% of total input and output).

- The EIS states that Deniliquin Line is operated and managed by Qube Logistics who has confirmed significant capacity on the line. It is understood that V/Line is the owner and manager of the Deniliquin Line. Therefore confirmation of capacity on the line should be obtained from V/Line.
- Agreement should be obtained from the owners of the Rice Grower's siding that their site can accommodate the proponent's requirements, including any specific requirements for the storage and transportation of ethanol from the site.
- The size of the largest vehicle likely to access the site should be confirmed. The EIS states that Deniliquin Barham Road is an approved 19m B-Double route and that the transportation of raw material and outputs from the plant will use heavy vehicles up to the B-Double category. It should be noted that the route between the project site and the Rice Grower's siding via Deniliquin Barham Road and Ricemill Road is an approved 36.5m Road Train route. The proposed access and internal roads should be designed to accommodate the largest vehicle to the satisfaction of Council.
- The EIS states that the majority of heavy vehicles would be travelling between the site and the Rice Grower's siding, adding an estimated 29 additional heavy vehicles per direction per day using the level crossings. These additional heavy vehicles may create queuing and stacking issues on the level crossing.

A detailed safety risk assessment should be undertaken for the level crossings on Ricemill Road to the satisfaction of Council and V/Line as road and rail infrastructure managers.

- The method of transportation of ethanol from the site, to the Rice Grower's siding and beyond (i.e. using road and rail tankers, or using ISO tank containers) should be clarified. This is to determine whether any ethanol storage and loading infrastructure is required beyond the project site, such as at the Rice Grower's siding.
- The impact of the proposal on the operation and pavement life of Ricemill Road should be assessed to the satisfaction of Council considering the EIS identifies an addition of up to 29 heavy vehicles per direction per day would traversing on this road.