



17 December 2019

General Manager
Energy & Resources - Planning and Assessment
GPO Box 39
Sydney NSW 2001

Attention: Mandana Mazaheri

PACIFIC HIGHWAY (H10) - SSI 9837: NEWCASTLE POWER STATION, LOT: 2 & 3 DP: 1023561, 1940 PACIFIC HIGHWAY TOMAGO

Transport for NSW (Transport) advises that legislation to bring Roads and Maritime Services and Transport together as one organisation came into effect on 1 December 2019 so we can deliver more integrated transport services across modes and better outcomes to customers and communities across NSW. Other than a name change from Roads and Maritime to Transport, it's business as usual and you can continue to enjoy the same service you do today.

Reference is made to Department of Planning, Industry and Environment's (DPIE) email dated 15 November 2019, regarding the abovementioned application which was referred to Transport for comment.

Transport understands the application to be for:

- the construction and operation of a dual fuel power station capable of operating on natural gas and/or liquid fuel (diesel),
- ancillary infrastructure including new gas storage pipeline passing under Old Punt Road to north east of the Newcastle Power Station (NPS) site, connection to gas supply, gas compression facilities and electricity transmission lines,
- construction related traffic on the Pacific Highway and Tomago Road for the duration of construction from 2021 to the end of 2022.

Access to the development is proposed off Old Punt Road along the eastern boundary of the subject site, with a new access road to be constructed. A separate access has been proposed to the Pacific Highway at the northeast of the power station site to facilitate emergency access and egress.

It is noted that movement of large equipment or pipes may be necessary during the construction period or maintenance. Operationally the largest vehicle that may require access to the site would be tankers associated with the delivery of diesel and removal of wastewater, with this to be completed by 50m³ B-Doubles.

Transport Response & Requirements

Transport's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

The Pacific Highway (H10) is a classified (State) road and Old Punt Road is a local road. Council is the roads authority for both roads and all other public roads in the area, in accordance with Section 7 of the *Roads Act 1993*. In addition, the M1 Motorway extension to Raymond Terrace (M12RT) project has been declared critical State significant infrastructure (SSI 7319) under section 115V of the Environmental Planning and Assessment Act 1979, as it is considered to be essential to the State for economic, environmental or social reasons. Transport is currently carrying out environmental assessment of the project through the completion of an Environmental Impact Statement (EIS).

Transport have reviewed the Environmental Impact Statement (EIS) prepared by Aurecon, dated November 2019, including Appendix K, Traffic Impact Assessment (TIA), prepared by SECA Solution dated October 2019, and provides the following comments to assist the consent authority in making a determination:

- Transport's major concern with the proposal is the impacts of NPS to the committed Critical Infrastructure Project, M1 Motorway extension to Raymond Terrace (M12RT).

Required Outcome: Continued commitment from AGL is required to enabling the future delivery of the M12RT project.

- Noting the interaction of the proposed Newcastle Gas Power Station and the M12RT project, Transport have been holding negotiations and design reviews with the proponent AGL to ensure that both projects can be delivered across the site. It is also vital that AGL continue to engage with Transport in subsequent development stages to resolve the interfacing impact between the proposed development and M12RT project.

Required Outcome: AGL shall continually liaise with Transport on the design of both State Significant Project proposals to ensure both can be delivered in this constrained area.

- It is noted that the EIS does not make any commitments to providing a project that adequately allows for the provision of the M12RT project in Section 9, Mitigation and Management.

Required Outcome: The EIS needs to provide further detail ensure that the M12RT project can be constructed and that there are no future constraints to the operation of the road network, particularly Old Punt Road.

- Transport has recently tabled a key design change to AGL in the area of their proposal. This redesign would minimise the interaction between the M12RT project and the proposal across AGL land, supporting the position above. A copy of our current strategic design, which AGL indicated initial support, is attached. (Please note this design is currently being developed into a concept design level of detail for the M12RT EIS and is not finalised to date. There may be further changes required in this highly constrained location).

The key changes that Transport has proposed include:

- Minimisation of the interchange requirements across the AGL proposal land
- Relocation of the interchange to the existing intersection of Pacific Highway / Old Punt Road.
- Upgrades to Old Punt Road to provide improved road conditions, including heavy vehicle access to/from Tomago.

Required Outcome: AGL shall liaise with Transport for NSW, and ensure the proposal enables design and construction of the M12RT project.

- The Proposal includes major utility connections across / within the Old Punt Road corridor. There have been no mitigation measures and limited details included addressing the manner in which these proposed works will be constructed or protected to ensure that Old Punt Road can be upgraded and continued to be maintained in the future.

Required Outcome: In this regard, AGL shall provide plans detailing how these utilities works are going to be constructed, protected and maintained in the future.

- The issues to consider include:

Gas Utilities

- Transport is aware that there are existing gas utilities in the Old Punt Road corridor. AGL should assess whether these utilities that are being connected to are adequately protected and enable future road upgrades along Old Punt Road.
- The future connections to the proposal should be located where they are adequately protected and / or relocated to ensure there are no conflicts with the future construction of the M12RT and associated upgrade to Old Punt Road.
- The AGL proposal suggests directional drilling of major gas utilities across the Old Punt Road corridor at depths of only 900-1200 deep. This is very likely to impact on M12RT constructability and maintenance as well as the current assets within the Old Punt Road corridor.

Transgrid Utilities

- The provision of the new Transgrid connection to the facilities has been discussed during the development of the project. Clearance heights over Old Punt Road were raised as an issue that AGL would need to investigate further. It is unclear from the EIS what clearances have been provided from and over Old Punt Road.

- The clearance heights over Old Punt Road should be consistent with over clearance over Tomago Road. Old Punt Road is a major heavy vehicle access road into the major Tomago industrial area. This road carries oversize/overmass (OSOM) vehicles regularly and this needs to be included in the design of the Transgrid utility connection.
- Vertical clearance heights along the M12RT have been required to be at 12m. Old Punt Road is proposed as a major interchange connection to the M12RT. The vertical clearance provided over Old Punt Road should be subject to Transport and Transgrid agreement.
- The new Transgrid towers should be located a suitable clearance from the Old Punt Road reserve to ensure Council / Transport have no horizontal clearance issue to manage in the future.
- All heavy vehicles accessing the site would do so via the intersection of the Pacific Highway / Old Punt Road. However, assessment of traffic impact at this intersection has not been provided with TIA. It is noted that a typical peak operation could see up to 120 B-Double tanker movements per day (in and out).

Required Outcome: It is recommended to undertake traffic impact assessment on intersection of the Pacific Highway / Old Punt Road. Analysis should also be provided to demonstrate the longest B-Doubles servicing NPS site can safely complete a left hand turn to Pacific Highway.

- It should also be noted that there doesn't appear to be an assessment of OSOM vehicles required to access the site during construction. AGL should be required to identify and provide an adequate assessment of how these larger heavy vehicles would be accessing the site. Any road improvements as a result of this assessment would be the responsibility of AGL to develop and construct prior to construction of the proposal.
- The proposed access from Old Punt Road would need to be adapted to the proposed Transport upgrade to Old Punt Road. The NPS proposal shall include the upgrade of Old Punt Road to accommodate the largest service vehicles accessing the AGL site as part of the AGL project. Further design will be required from AGL and will need to be adapted to fit to the upgrades required on Old Punt Road. In order to allow for right turns into the site access to occur in a safe, a channelised right turn treatment (CHR(S)) on Old Punt Road southbound has been proposed.

Required Outcome: The road and intersection upgrade would be the responsibility of AGL. The upgrade work should comply with relevant standards appropriate for major heavy vehicle access.

- No potential hold area / point is proposed along the access road for at least 100m for allowing free flow into the site, noting that up to 66 truck movements and 270 staff movements are estimated for the AM peak hour construction traffic.

Required Outcome: The access road shall be designed to ensure no queuing onto Old Punt Road at the site access.

- Design of internal roads and service area would only be confirmed as part of the detailed design for the site.

As the application seeks approval for construction and operation of the power station, it is requested that a layout of the internal roads and service area be included (as stipulated in the SEARs - site plans and maps at an adequate scale showing the location and dimensions of all project components) and provide analysis that demonstrates adequacy of accommodating OSOM vehicles to access the site.

- It is optimal for Old Punt Road upgrade and / or utility works (e.g. gas transmission and storage pipelines, and overhead electrical) to be completed as early stage in the AGL program (prior to power plant) to minimise the impact on existing road impacts and enable delivery of the M12RT project. It is noted that through discussions with AGL that the proposal construction works are intended prior to the likely timing for construction of the M12RT project.

Required Outcome: All road works required to cater for the proposal shall be constructed prior to substantial commencement of the NPS project.

- Required Outcome: AGL shall install the assets in a manner that creates no limitations on the construction and /or operation of the road reserve (e.g. full protection of underground assets that facilitates road construction / operation, and design and construction of above ground assets that has suitable clearances in the road reserve that does not create constraint for Transport construction and operation in the road reserve).
- The proposed emergency access point in north east corner of NPS site will likely interfere with proposed M12RT and it is not suitable to put vehicles on to the Pacific Highway or proposed motorway.

Required Outcome: The EIS needs to provide further details, and undertake further consultation on this emergency access point prior to Transport accepting the location of the emergency access connection. Its location and design will need to adapt to the M12RT design through this area.

- The report identified the use of OSOM vehicles.

Required Outcome: It is recommended that management of OSOM vehicle movements be included in the construction traffic management plan (CTMP).

- The aboriginal heritage report highlights that Roads and Maritime Services will complete salvage on part of the AGL site, however as AGL will impact the heritage sites prior to Transport works, the cultural heritage salvage must be more comprehensively addressed in the AGL EIS.

Required Outcome: Noting the timing of construction, if approval is being sought across the entire AGL site, there shall not be a reliance on Transport to address these issues as our actions can only be carried out after M12RT project approval is granted.

- There has been inadequate monitoring and modelling complete to demonstrate what the impacts of both construction and operational surface water discharges to the area affected by the M12RT project. Aquatic species protection thresholds do not appear to align with ANZECC and/or NSW SWQ objectives.

Required Outcome: Appropriate and consistent criteria thresholds should be applied to the operation of the site. Any potential discharges to surface water or ground water should be confirmed by the appropriate regulatory authority to enable cumulative impact assessments to be made by both projects.

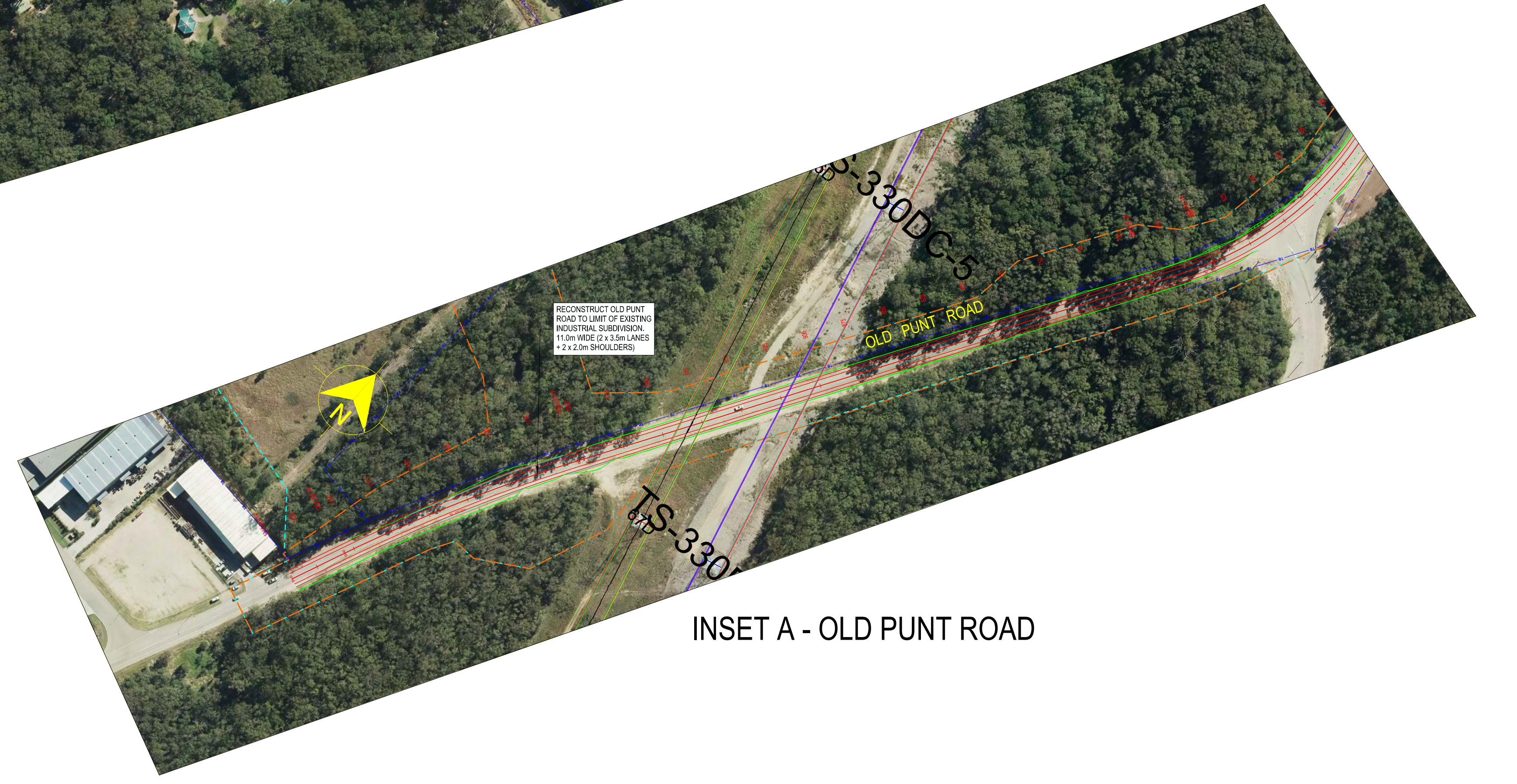
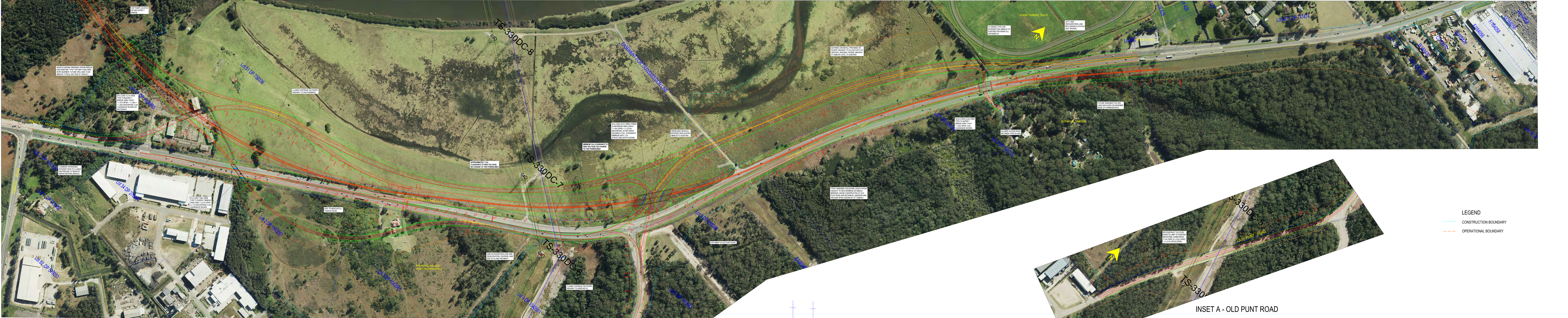
Further monitoring and modelling needs to be completed prior to approval to understand direct and cumulative impacts of the proposed discharges with regards to M12RT.

Should you require further information please contact Kumar Kuruppu, Development Assessment Officer, on 4908 7688 or by emailing development.hunter@rms.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Marler', with a stylized flourish at the end.

Peter Marler
Manager Land Use Assessment
Hunter Region



- LEGEND
- CONSTRUCTION BOUNDARY
 - OPERATIONAL BOUNDARY

