



8 June 2021

WST12/000109/02 SF2021/072707  
PA 09\_0186 - Mod 1 EXH-197827

The Director  
Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Emily Murray

Dear Emily

**PA 09\_0186 Mt Piper Ash Placement Project proposed Modification Application**

Thank you for the opportunity to provide comment in relation to the proposed modification to PA 09\_0186 – Mod 1 relating to Energy Australia's Mt Piper Ash Placement Project.

Transport for NSW (TfNSW) has reviewed the documents provided and understands that the proposed modification involves:

- Installation of a liner to encapsulate the Brine Conditioned Ash (BCA) and Solid Mixed Salts and other authorised wastes within the currently approved LNAR.
- Placement of BCA and Solid Mixed Salts from the surface of the liner up to the maximum approved LNAR height.
- Replacement of the currently approved 1 m thick Water Conditioned Ash perimeter layer with a suitable capping liner.
- Installation of leachate management infrastructure, including double lined multipurpose storage ponds.
- Minor amendments to the approved LNAR boundary, including excising the Western Coal Services washery infrastructure.

TfNSW notes the applicant's commitment to provide an updated Operational Environmental Management Plan incorporating mitigation and management measures in relation to potential traffic impacts.

TfNSW provides the following recommendations for consideration by the consent authority.

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- The existing daily traffic volumes and mix of vehicles (as approved in the development consents) are not be permitted to increase beyond currently approved levels.
- The size of the design vehicle is limited to a PBS truck and dog trailer or PBS prime mover and semi-trailer configurations with a maximum length of 20 metres.
- Prior to commencement of haulage in association with liner material the applicant is to implement an updated Operational Environmental Management Plan incorporating mitigation and management measures in relation to potential traffic impacts including;
  - Measures to manage the number of vehicle movements in accordance with the approved development consents.
  - Measures to ensure the haul routes proposed are communicated to contractors and staff and complied with.
  - Measures to limit impacts associated with peak traffic such scheduling of haulage vehicle movements to occur outside of daily commuter peak periods, local special event times, school bus (both in rural and town areas) and school zone operating hours.
  - Measures to limit impacts associated with traffic queuing at intersections such as scheduling to avoid convoys.
  - Incorporation of a Driver Code of Conduct for the task of transporting materials on public roads, this is to apply to any haulage undertaken via contractors and staff. The Driver Code of Conduct is to be submitted and approved to the satisfaction of the consent authority. The document is to cover the matters referred to within the Driver Code of Conduct Annexure (attached). The development is to be carried out in accordance with the approved Code of Conduct at all times.

If you wish to discuss this matter further, please contact the undersigned on (02) 6861 1530.

Yours faithfully



**Howard Orr**  
**Team Leader Development Services**  
**Development Services West**  
**Regional and Outer Metropolitan**

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## **Driver Code of Conduct - Annexure**

The Driver Code of Conduct is to outline measures to manage traffic related issues associated with all phases of the development (e.g. deliveries, construction, operation, maintenance, decommissioning), any construction or excavated materials, machinery and personnel involved. The TMP is to detail the potential impacts associated with the development, the measures to be implemented, and the procedures to monitor and ensure compliance. The TMP is to address (but not be limited to):

- a) Specific commitments for the provision and use of buses and car-pooling during construction to limit peak hourly traffic in accordance with the approved conditions of consent. Plans and measures to manage the impacts of personal vehicle parking at pickup points (e.g. in towns) are to be detailed.
- b) An enforceable policy for staff and contractors to use the designated commuter and haulage routes in preference to back roads, where the journey is not unreasonably lengthened, as detailed in the approved conditions of consent.
- c) Details of origin, destination, quantity, size and frequency of vehicle movements associated with the development including those accessing and egressing the site.
- d) Timings and staging of construction and operation of the development.
- e) Existing and projected background traffic, peak hour volumes and types and their interaction with projected development related traffic.
- f) Loads, weights, lengths and number of movements of haulage and construction related vehicles including Over Size Over Mass (OSOM) loads.
- g) The management and coordination of construction and staff vehicle movements to the site and measures to limit disruption to other motorists, including special OSOM management measures.
- h) Scheduling of haulage vehicle movements to occur outside of daily commuter peak periods, local special event times, school bus (both in rural and town areas) and school zone operating hours.
- i) Scheduling of haulage vehicle movements to manage the number of vehicle movements in accordance with the approved development consent.
- j) Active communication procedures for traffic such as school buses or haulage vehicles from other quarries, or near potential safety hazards.
- k) Scheduling of heavy vehicle movements to minimise convoy or platoon lengths.
- l) Consideration to minimise the route length for road transport, particularly for OSOM loads.
- m) Any OSOM will be the subject of separate permits through the National Heavy Vehicle Regulator.
- n) Mitigation of local climate conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the facility (e.g. scheduling during daylight hours, or outside of fog, wet weather, ice or snow).
- o) Transport of hazardous materials in accordance with the relevant transport codes.
- p) Specific mitigation measures along the approved transport routes. Road and intersection improvement works are to be completed prior to the

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commencement of on-site construction unless specifically approved otherwise in the conditions of consent.

- q) Consultation and engagement with affected stakeholders, including regulatory authorities, landowners, businesses, bus operators and so forth.
- r) Policies and procedures for addressing concerns raised by the community on project related matters.
- s) Dust suppression and mitigation measures on public roads and within the site boundaries.
- t) Toolbox meetings to facilitate continuous improvement initiatives and incident awareness.
- u) Truckloads are to be covered at all times when being transported, to minimise dust and loss of material onto roads which may form a traffic hazard.
- v) Measures to ensure responsible fatigue management and discourage driving under the influence of alcohol and/or drugs, dangers of mobile phone use and driving to the conditions, and adherence to posted speed limits.

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