



Our ref: STH18/00073/11
Contact: Andrew Lissenden 4221 2769
Your Ref: SSI 9687

21 November 2019

Anthony Ko
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NSW Department of Planning, Industry and Environment
BY EMAIL: information@planning.nsw.gov.au

SNOWY 2.0 MAIN WORKS ENVIRONMENTAL IMPACT STATEMENT (SSI 9687) - PUBLIC EXHIBITION COMMENTS

Dear Anthony,

Roads and Maritime Services (RMS) refers to your correspondence dated 19 September 2019 relating to the above State Significant Infrastructure (SSI) application that has been forwarded to RMS for comment.

RMS has completed an assessment of the information provided and notes:

- The key state classified roads are the Monaro Highway, Sharp Street, Bombala Street and the Snowy Mountains Highway. Polo Flat Road to which some vehicles associated with the Snowy 2.0 Main Works will access to/from is a regional classified road;
- The development will generate a significant amount of additional traffic (both light and heavy vehicles) that has the potential to adversely impact upon the state road network. The impact of this traffic needs to be considered and adequately mitigated by the proponent;
- The traffic implications of the proposed development cannot be considered independently of the Snowy Segment Factory project;
- Discussions between RMS, the applicant, their consultants and Snowy Monaro Regional Council are ongoing. RMS is supportive of this continuing; and
- Some of the works proposed as part of this application will affect navigable waters and as such NSW Maritime have provided comments to RMS to enable a combined submission.

Noting the above RMS advises the application does not provide sufficient information to assess the impacts of the proposed development on the State road network. Detailed comments of the matters to be addressed prior to determination are outlined in **Annexure 1**.

Comments from NSW Maritime to be considered are provided in **Annexure 2**.

If you have any questions please contact Andrew Lissenden on 4221 2769.

Please ensure that any further email correspondence is sent to 'development.southern@rms.nsw.gov.au'.

Yours faithfully

A handwritten signature in blue ink that reads "Sam Knight". The signature is fluid and cursive, with the first name "Sam" and last name "Knight" clearly distinguishable.

Sam Knight
Director Southern Region

Cc: Anthony.Ko@planning.nsw.gov.au

Roads impacts - Additional information required

- Types of vehicles

RMS is supportive of PBS vehicles being used and as such encourages further discussions with RMS Freight Branch in relation to the above so as to enable an agreement to be reached prior to the applications determination on the type of PBS vehicle to be used. Details of these discussions should be provided as part of any additional information that is provided.

- Impact on journey times and identification of appropriate measures

RMS notes that no assessment of the impact of the development on journey times for motorists along the classified road network has been undertaken or appropriate measures identified to minimise delays and to ensure road users are kept well informed of the increased traffic and changes driving experience (i.e. slow vehicle turn out bays, electronic variable message signage at key locations on the road network, etc).

RMS requests this issue be addressed.

- Impact on existing intersections and identification of appropriate upgrades

RMS notes the assessment that has been undertaken and provides the comments in the table below.

Intersection	Proposed Upgrade as part of the current SSI application (as detailed in the Main Works EIS and TIA)	RMS Comments
Monaro Highway, Polo Flat Road and Yallakool Road	No	RMS does not believe the existing intersection is adequate to cater for the increased heavy vehicle movements associated with the development (both for the required right turns in to Polo Flat Road and the left turns out onto the Monaro Highway). While the existing treatment at the intersection does not comply with Austroads standards with respect to treatments for turn warrants, RMS does not believe it is acceptable to increase movements at this intersection without providing an appropriate upgrade.
Monaro Highway and Saleyard Road	No	Upgrade identified as being needed in the TIA however no details on what that upgrade would be have been provided.
Monaro Highway/Sharp Street and its intersection with Bombala Street.	No (nil specific details provided although it is acknowledged that changes will be required to accommodate specific Over Size Over Mass (OSOM) vehicles)	RMS is concerned with the impact the development traffic will have on the existing operation of the intersection as well as the impacts of increased heavy vehicle traffic on pedestrian movements across Sharp Street at this location. RMS notes that adjustments to the existing roundabout will be required for transporting tunnel boring machines, transformers, etc with no details being provided as part of this application. The current application advising that this is being addressed as part of the Modification 2 application to the previously approved Exploratory Works (SSI 9208). This being the reconfiguration of the existing roundabout to allow

		for OSOM vehicles.
Monaro Highway/Sharp Street and its intersection with Vale Street	No (no specific details provided although it is acknowledged that changes will be required to accommodate specific OSOM vehicles)	Swept path plans need to be provided to demonstrate that vehicles (associated with this development) can undertake a manoeuvre through the existing roundabout. RMS does note adjustments to the existing roundabout will be required for transporting tunnel boring machines, transformers, etc with no details being provided as part of this application. As above the applicant has advised that this will be addressed as part of Modification 2 to the previously approved Exploratory Works (SSI 9208).
Kosciusko Road and its intersection with the Snowy Mountains Highway	No	RMS is concerned with the right turn movements onto the Snowy Mountains Highway and the left turn movements out of the Snowy Mountains Highway given the number of light and heavy vehicles and the ability of vehicles to be contained within the existing pavement.
Snowy Mountains Highway and its intersection with Rock Forest (holding lot)	Yes. Basic Right Turn (BAR) Treatment and Auxiliary Left Turn (AUL) treatment.	RMS is satisfied with the proposed treatment subject to the provision of concept designs and swept paths (refer to additional comments below).
Snowy Mountains Highway and its intersection with Tantangara Road	No	RMS is concerned with this access point given its reduced sight distances and its horizontal and vertical geometry. At minimum for right turns into the site a Channelised right (CHR) treatment should be provided. The left turn out of Tantangara Road is also considered to be a problem and could be addressed via shoulder widening to enable heavy vehicles leaving to accelerate and gain additional speed before merging into the travel lane. Any works proposed should avoid impacting the chain bay to the west of the intersection. Sealing of the mouth of the Tantangara Road intersection would also be required. Concept designs and swept paths should be provided (refer to additional comments below).
Snowy Mountains Highway and its intersection with Link Road	No	While RMS acknowledges the constraints with the existing intersection (e.g. two lane bridge to the south of the intersection), measures should be identified that can be implemented to minimise delays and inform the road users about changed traffic conditions (e.g. Vehicle Activated Sign (VAS) to alert east bound motorists and a slow vehicle turn out to the east of the existing bridge).
Snowy Mountains Highway and the Marcia Trail access point	Yes. BAR and Basic Left Turn (BAL) treatment	RMS is satisfied with the proposed treatment subject to the provision of concept designs and swept paths (refer to additional comments below).

RMS requests the submission of additional information to address above comments. This information needs to include, but not be limited to:

- Scaled plans to support sight distance measurements.

- Swept path analysis for all intersections.
- SIDRA modelling, including information to support calibration and validation (i.e. existing queue lengths, delays) and electronic copies of the modelling.
- Excavated Rock: RMS notes that excavated rock will be generated as a result of tunnelling activities and earthworks (i.e. approximately 9 million m³). The information in the EIS and TIA indicating that one option for it is to be transported off site. The vehicle generation figures provided with the application do not currently factor in the transportation of any of the excavated rock off site. Should transportation off site be required/proposed as part of the current application then a reassessment of vehicle generation rates for the project as well as a reassessment of intersection upgrades at the intersections impacted will need to be undertaken by the applicant.
- Tunnelling: RMS notes that the proposed tunnelling will, in part, go under the Snowy Mountains Highway. RMS while acknowledging that limited details on these works can be provided at this time advises that any tunnelling activities under or in vicinity to the Snowy Mountains Highway/a classified road will require written approval from RMS under Section 138 of the *Roads Act 1993* prior to undertaking the works. RMS needs to be satisfied that these works will have no impacts on the classified road network (e.g. impacts of subsidence, compromised RMS infrastructure, etc).
- Heavy Vehicle Salvage
No details on how heavy vehicle salvage, if required, will be dealt with so as to minimise impacts on the state road network (e.g. plans/protocols, how road users will be kept informed, etc).
RMS requests that this information be provided.
- Strategic/concept designs
RMS notes that a strategic/concept design has not been provided as part of the EIS information submitted for any proposed upgrade works. RMS request that strategic/concept designs be submitted.
These should clarify the scope of works, demonstrate the works can be constructed within the road reserve and allow the consent authority to consider any impacts of the works as part of their assessment. The concept design must be to scale, identify legal property boundaries (inclusive of road reserve boundaries), detail existing lane widths, proposed lane widths, new/proposed works, lane lengths and demonstrate the works will comply with the applicable requirements of Austroads Guide to Road Design and associated technical directions.
- Environmental Impacts
Noting the comments above any road infrastructure upgrade works that are being proposed as part of the current application will need to give consideration/undertake an assessment of the environmental impacts of the proposed works.
- Other General Comments:
RMS notes a road safety audit (RSA) has been undertaken with details being submitted as part of the TIA for the application. It is unclear to RMS what is being actioned from the RSA that has been submitted and who is responsible for implementing the RSA recommendations. Additional details are required in relation to the above inclusive of a timeframe for when identified actions will be completed.

NSW Maritime comments

NSW Maritime, at this time, has had good engagement with Snowy Hydro and their consultants on this project in relation to the developments impact on navigation. As such, based on the information provided it has been assessed that there will be minimal impact on safe navigation when appropriate management of waterway traffic is in place. NSW Maritime will provide further assistance in managing any impact to safe navigation and/or waterway access and amenity as required.

Maritime believe the greatest impact is likely once the project is operational. This aspect continues to be addressed by Snowy Hydro and their consultants. Should an approval be issued Maritime requests that the following requirements be included:

1. Any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the Marine Safety (Domestic Commercial Vessel) National Law Act 2012. Of particular note is the requirement to display an all-round white whilst at anchor light between the hours of sunset and sunrise.

Note: No agent will be exempt from the provisions of the Marine Safety Act 1998, or any other relevant legislation, and all agents must comply with any direction given by RMS officers with regard to the prevention of pollution or safe navigation.

2. A Waterway Traffic Management Plan (WTMP) shall be prepared, which may include enacting an 'Exclusion Zone' (which NSW Maritime has the statutory delegation to declare) to ensure the safety of vessel traffic and to establish safe working zone/s. The NSW Maritime Division of RMS will and can advise relevant parties (e.g. contractors engaged to complete the works) on the formulation of a WTMP.