



**Transport
for NSW**

Mr Carl Dumbleton
Senior Planner
Department of Planning and Infrastructure
23-33 Bridge Street, Sydney NSW 2000
GPO Box 39, Sydney NSW 2001

DUBBO ZIRCONIA PROJECT

Dear Mr Dumbleton,

Thank you for the opportunity to provide comment in response to the exhibition of the Dubbo Zirconia Project. This response includes Roads and Maritime comment.

Transport for NSW considers that the Traffic Impact Assessment provided by the proponent does not adequately meet the Director General's Requirements. Transport for NSW requests that the proponent provide further detailed assessment of the issues.

Of particular concern is the proposal to undertake a full assessment of transport option 'A' five years after the project has commenced. Transport for NSW does not consider this to be acceptable. It is requested that a full and thorough assessment of the transport options identified in the Traffic Impact Assessment, including specific details of the exact transportation arrangements to be implemented throughout the life of the project, be completed prior to the Department of Planning and Infrastructure making its determination.

An annexure outlining the detail of the Transport for NSW and Roads and Maritime concerns is attached.

The Transport for NSW contact in this matter is Mr Tim Dewey, Senior Transport Planner who may be contacted on 8202-2188. The local and Roads and Maritime contact is Fiona Francis, Development Assessment Officer who may be contacted on 02 6861 1688.

Yours sincerely,



2/12/13

Mark Ozinga
Manager
Land Use Planning and Development

CD13/23136

Annexure to TfNSW submission to Dubbo Zirconia Project

Transport for NSW and Roads and Maritime consider that the Traffic Impact Assessment provided by the proponent does not adequately meet the Director General's Requirements. Transport for NSW requests that the proponent provide further detailed assessment of the issues outlined below.

Of particular concern is the proposal to undertake a full assessment of transport option 'A' five years after the project has commenced. Transport for NSW does not consider this to be acceptable. It is requested that a full and thorough assessment of the transport options identified in the Traffic Impact Assessment, including specific details of the exact transportation arrangements to be implemented throughout the life of the project, be completed prior to the Department of Planning and Infrastructure making its determination.

This should include, but not be limited to, the following:

1. A full case for reinstating the Dubbo to Toongi rail line, including a preliminary scoping study, which has been reviewed and confirmed by Transport for NSW, should be submitted. The Dubbo to Toongi Rail Line has been closed since 1987. Accurate assessments of the likelihood of transport option 'A' being implemented with and without Government funding need to be prepared.
2. Since the Dubbo to Toongi rail line closed in 1987 there has been a substantial increase in traffic on the Mitchell Highway. If the rail line is to be re-opened then Transport for NSW and RMS maintain that all crossings of the Mitchell Highway should be to a grade separated standard and this requirement form a base case for the scoping study. More detail on the level of traffic increases on the Mitchell Highway is attached at **Tab A**.
3. Traffic volumes for the Mitchell and Newell Highways used in the Traffic Impact Assessment appear to be low. This is particularly relevant for the assessment of impacts at the Obley Road and Newell Highway intersection and the Mitchell Highway rail level crossing. Roads and Maritime questions the projected queue of 96 vehicles (p11-69), it is likely to be greater than this. Notwithstanding the discrepancy, a queue of 96 or more vehicles is considered by Roads and Maritime to be an unacceptable delay to the Highway which will cause further delays and disruptions to the wider road network.

4. The Traffic Impact Assessment (p11-25) states that there will be no crossings of classified roads for the gas pipeline, however other parts of the documentation refer to a crossing of the Mitchell Highway for the gas pipeline. If a gas pipeline is proposed to cross the Mitchell Highway, Roads and Maritime requires the proponent to enter into a Pipeline Road Crossing Deed to cover the works, maintenance and liability for the pipeline crossing of the Highway.
5. Further detail on the likely train make up and frequencies required to service the project's transportation requirements between Port and Dubbo and/or Toongi. It is recommended that a train plan be prepared which gives consideration to the potential for amalgamating the rail transportation requirements of the project with existing services where practicable.
6. Further detail on the mining outputs associated with the project, including the transport arrangements to support this, such as daily/week tonnages, mode and configurations, route, time of day travel (if necessary) and destination(s) should be supplied.
7. Further detail on rail level crossings situated between Dubbo and Toongi, the infrastructure required supporting the safe operation of these crossings and any mitigation measures necessary should be supplied. As noted above Transport for NSW raises particular concern regarding the proposed re-instatement of the at-grade crossings of the Mitchell Highway and has a preference for grade separated crossings.
8. Confirmation from the proponent that Fletcher International Exports can accommodate the proponent's requirements within their rail terminal should transport option B be implemented. Transport for NSW raises concerns around the compatibility of transportation and storage arrangements potentially required by the project and existing operations on site, as well as, the need to acquire any kind of licences due to the chemicals being transported. Should transport option B be the transport option implemented, It is requested that the conditions of consent include a clause requiring that the proponent ensure a suitable rail terminal is sourced within an acceptable period of time should existing terminal access change for any reason during the project life. Any change in terminal arrangements should involve the preparation of a new traffic assessment.
9. Further detail on the proposed gas pipeline to be contained within the rail corridor, regarding the design (including its proposed location in relation to the rail track and any proposed structures), construction and operation of the pipeline. The design must comply with all other aspects of CRN CS 540 Service Installations in the Rail Corridor. However, Transport for NSW would prefer that the pipeline is constructed

outside the rail corridor. Further comments surrounding the gas pipeline are included in **Tab B**.

10. RMS has also provided Indicative requirements for major gas route crossings outlined at **Tab C**.
11. The matter raised by John Holland Rail in their response to the preliminary EIS regarding soil contamination has not been addressed. The potential for soil contamination of the existing rail corridor must be assessed prior to any works commencing on site.

The Department of Planning and Infrastructure should note that Transport for NSW has no plans or funding allocated to re-open the rail line between Dubbo and Toongi. A business case for re-instatement of the line would need to be developed by the proponent to support re-opening the rail line. The following additional matters are to be noted by the proponent when preparing the business case:

1. The interface point between the ARTC Leased Network and the Country Regional Network is on the Dubbo side of where the rail corridor crosses Wingewarra Street. The operational signalling interface would need to be moved further towards Toongi at a point where a train waiting on acceptance onto the ARTC network would not block any level crossing.
2. The EIS states that a license agreement between John Holland Rail and the applicant would be required to upgrade the Toongi to Dubbo rail line. This agreement would in fact be between Transport for NSW (CRC) and the applicant.
3. The proponent should ensure that all assessment and design involving rail infrastructure complies with the Rail Safety National Law, including substantial operational interface and risk management processes. And that any assessment or design works are undertaken by personnel with the appropriate Engineering Authority issued or agreed to by JHR CRN Principal Engineers, designed and installed as per Australian Standards and JHR CRN standards, and where necessary any assessment involves representatives of JHR Infrastructure and Safety.

Tab A – Traffic Volumes on Mitchell Highway

AADT Station 93.839 Year of Count	AADT Count
1984	12540
1996	15008
2005	17718
2013	22160

Tab B – Further information regarding gas pipeline in railway corridor

Further comments relating to the proposed gas pipeline:

1. The applicable codes and standards regarding the pipeline include CRN CS 540: Service Installations in the Rail Corridor, (CRN CM 541 Service Crossing – for guidance on process) and Australian Standard AS 1799-2000: Installation of underground utility services and pipelines within railway boundaries. Compliance with these standards is required for safety accredited rail operations on the corridor.
2. Transport for NSW notes that trenching was specified as the main installation method and that the EIS specified minimum trenching to 750mm. The provisions mentioned above include a minimum depth of 1200mm in accordance with AS4799 Fig. 5.2. Any trenching works must also ensure that stability of all embankments and cuttings during construction and/or restoration is maintained. This must be certified by a qualified Geotechnical Engineer.
3. The pipeline must be designed to withstand R20 vehicle loading, and where it crosses under the rail track, it must be designed to the requirements of CRN CS 540 – 6.3.4.
4. Transport for NSW also notes that encasing pipes is required for any track crossing.
5. It should be noted that attaching pipelines to any rail under bridges or structures is not permitted. Transport for NSW requires that the proposed alignment of the pipeline provides sufficient clearance to enable renewal of existing infrastructure without any impacts to the pipeline or the requirement of any special procedures.
6. Transport for NSW notes that by upgrading the pipeline prior to the rail line, protection requirements for the operational pipeline during track upgrade works is likely to significantly increase costs. It is recommended that the detailed design of the pipeline and the track alignment is coordinated.

Tab C – Further information regarding gas pipeline crossings of the Mitchell Highway

1. A copy of the Certificate of Currency for Public Liability Insurance, for an amount not less than \$20 Million, from the contractor carrying out the work, is to be provided with the Consent application.
2. A description of the work location (including location plan), giving the distance from the nearest major intersection (or other well defined reference feature).
3. The pipeline should have a minimum cover of 1500mm under the road formation and 900mm to any other point on the surface within the road reserve, including from the bottom of any drain. Further to this Roads and Maritime requires that the pipeline be at such a depth that still allows future road maintenance to occur without interfering with the pipeline. This requires that Roads and Maritime be able to dig out up to 1m depth of existing pavement material and utilize heavy road construction equipment (e.g. 24 tonne vibrating roller). If a suitable depth that allows this maintenance activity cannot be practicably achieved using under boring then trenching through the road formation may be considered by Roads and Maritime, requiring the installation of a concrete slab covering the pipeline in the trench, for extra protection.
4. Crossings should be carried out using mechanical under boring construction rather than hydraulic means, unless it is impracticable to meet depth requirements to allow various Roads and Maritime maintenance activities, and a concrete slab over the pipe is required, in which case trenching may be considered by Roads and Maritime.
5. Any crossing should be at right angles (or as near as possible) to the road centreline to minimise the impact area of pipe sensitivity. Also the crossing should avoid being in close proximity to any existing road intersection as there is an increased likelihood that there will be improvement maintenance works at that location in the future.
6. In rural areas there should be readily visible location markers on either side of the road, placed outside the clear zone (10m from edge line). In urban areas the location of the bore (or conduit) should be recovered on the kerb directly above the bore casing to enable its exact location to be determined should future road works be necessary.
7. The pipeline in the road reserve should be located as near as practicable to the road reserve boundary. The minimum distance away from the road (in the road reserve, running parallel to the road centreline) should allow Roads and Maritime to undertake shoulder widening work, curve improvement and any addition of an overtaking lane, without adversely impacting on the integrity of the pipeline. In the

road reserve the pipeline should avoid any existing rest areas or active stockpile sites. These are located outside the road formation but may also require future Roads and Maritime maintenance activities.

8. Works-As-Executed Plans should be provided to this office indicating final levels, distances and locations upon completion of the works.
9. All arrangements for the control of traffic shall be in accordance with the Roads and Maritime Services' publication "Traffic Control at Work Sites". If traffic will be impacted on due to the work, then an application for a Road Occupancy Licence will be required, with a Traffic Management Plan forming part of the application. Applications can be made by contacting Roads and Maritime Traffic Operations Manager, on (02) 6861 1686.
10. If any part of the work is to be carried out within a Travelling Stock Route (TSR), the local Rural Lands Protection Board (RLPB), whose control that land comes under, shall be contacted for their concurrence to the work.
11. Roads and Maritime Area Maintenance Manager, Holly Davies, at the Dubbo office should be contacted for liaison, at least 10 days prior to commencing work, on (02) 6841 4774.