



Our ref: STH18/00073/15
Contact: Andrew Lissenden 4221 2769
Your Ref: SSI 10034

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SNOWY 2.0 SEGMENT FACTORY (SSI 10034) - RESPONSE TO SUBMISSIONS REPORT AND DRAFT CONDITIONS COMMENTS

Dear Anthony,

Reference is made to your correspondence dated 20 December 2019 and 23 January 2020 relating to the above State Significant Infrastructure (SSI) application. On 1 December 2019 legislation came into effect to bring Roads and Maritime Services (RMS) and Transport for NSW (TfNSW) together as one organisation. This response reflects the advice from the new organisation.

TfNSW has reviewed the additional information provided (i.e. Segment Factory Response to Submissions dated 19 December 2019 and draft conditions for the Snowy 2.0 Segment Factory Project) focusing on the impact to the state road network.

Having regard for the above TfNSW advises that it will not object to the amended SSI application subject to the draft conditions being updated to address the matters detailed in **Attachment 1**.

In addition, **Attachment 2** provides context to the information detailed in Attachment 1.

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 sincerely

A handwritten signature in blue ink that reads 'Sam Knight'.

Sam Knight
A/Regional Director South

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Comments on NSW Department of Planning, Industry and Environment (DPI&E) Draft Conditions

• Schedule 3, Condition 3

TfNSW notes that draft condition 3 references intersection upgrade works to be completed on the state road network. As a result of ongoing discussions with the Snowy Hydro Limited (SHL) the intersection upgrades as detailed in Part (a) and (b) of this condition that relate to the intersection of Polo Flat Road/Monaro Highway and the intersection of Monaro Highway/Yallakool Road are no longer correct.

In addition, an agreement between TfNSW and SHL is in the process of being enacted by both parties that, in part, details who will undertake specific works on the state road network and how they will be delivered (i.e. under this SSI application or separately assessed under Part 5 of the *Environmental Planning and Assessment Act 1979* (EPA Act) with delivery by TfNSW).

Having regard for the above it is requested that this condition be amended so as to remove reference to Parts (a), (b) and (c) and include reference to the intersection upgrades as detailed in the following table.

Intersection	Proposed Upgrade/Works	Assessment	Delivery
Monaro Highway and Polo Flat Road.	To be upgraded from a t intersection to a three-way, single-lane roundabout.	TfNSW to assess under Part 5 of the EPA Act.	To be delivered by TfNSW as the 'Proponent'.
Snowy Mountains Highway/Sharp Street and its intersection with Bombala Street.	Will remain in its current state with the addition of a temporary traffic signal on Bombala Street (northern side) that will be used if the traffic queues stretch beyond the Cooma Creek Bridge. Some minor works to existing kerbs, signage and internal roundabout pavement will be required to accommodate oversized and over mass special movements.	Works to accommodate oversized and over mass special movements need to be assessed by DPI&E as part of the current SSI application. The temporary traffic signals will be delivered by SHL under exempt development under <i>State Environmental Planning Policy Infrastructure) 2007</i> (ISEPP).	To be delivered by either SHL or TfNSW following SSI determination.
Snowy Mountains Highway/Sharp Street and its intersection with Vale Street.	Some minor works to existing kerbs, signage and internal roundabout pavement to accommodate oversized and over mass special movements	Works to accommodate oversized and over mass special movements need to be assessed by DPI&E as part of the current SSI application.	To be delivered by SHL.
Kosciuszko Road and its intersection with the Snowy Mountains Highway.	Shoulder pavement works to accommodate the turn paths for heavy vehicles.	TfNSW to assess the works. TfNSW understands that these works could be considered as exempt development under ISEPP noting the nature of the	To be delivered by TfNSW.

	<i>Note: As detailed in Attachment 2 Table 3.3 in the applicants Response to Submissions (RtS) refers incorrectly to this intersection as a four-way intersection when the intersection is a three-way intersection.</i>	required works (i.e. minor road shoulder work to seal the unsealed shoulder of the existing road formation and line mark).	
Snowy Mountains Highway and its intersection with Rockforest (Russell Lot)	To be upgraded to provide Basic Right Turn (BAR) Treatment and Auxiliary Left Turn (AUL) Treatment.	Works need to be assessed by DPI&E as part of the current SSI application.	To be delivered by either SHL or TfNSW following SSI determination.
Snowy Mountains Highway and its intersection with Tantangara Road	To be upgraded to include a dedicated right turn lane on the Snowy Mountains Highway. A vehicle activated sign will also be installed to warn drivers of increased truck movements in the area.	TfNSW to assess under Part 5 of the EPA Act. The proposal to reduce the posted speed limit in the vicinity of the intersection from 80km/h to 60km/h is not supported by TfNSW.	To be delivered by TfNSW.
Snowy Mountains Highway and its intersection with Marcia Road	To be upgraded to provide Basic Right Turn (BAR) Treatment and Auxiliary Left Turn (AUL) Treatment.	Works need to be assessed by DPI&E as part of the current SSI application.	To be delivered by either SHL or TfNSW following SSI determination.
Snowy Mountains Highway and its intersection with Link Road	To be upgraded through minor pavement marking changes and the addition of a vehicle activated sign.	TfNSW to assess the works. TfNSW understands that these works can be considered as exempt development under ISEPP noting the nature of the required works (i.e. line marking, signage).	To be delivered by TfNSW.
Monaro Highway and its intersection with Sales Yard Road	To be upgraded to provide a Basic Right Turn (BAR) Treatment and a vehicle activated sign to warn users of the Monaro Highway of any vehicles turning out of Sale Yard Road.	Works need to be assessed by DPI&E as part of the current SSI application. TfNSW understands that these works can be considered as exempt development under ISEPP noting the nature of the required works.	To be delivered by TfNSW.

- Reference to Roads and Maritime Services/RMS

TfNSW notes that the draft conditions provided refer to RMS. As detailed in the covering letter RMS is now TfNSW. As such, reference to RMS in any approval issued should be changed to TfNSW.

Additional Conditions/Requirements to those in the DPI&E Draft Conditions

• Working Group

A Snowy 2.0 Operations Working Group must be in operation within 4 weeks of upon any approval being issued. This working group shall include, but not be limited to representatives from Snowy Hydro Limited, the project's principal contractor Future Generation Joint Venture (FGJV), TfNSW, local governments (Snowy Monaro Regional Council and Snowy Valleys Council), the NSW Police, National Parks and Wildlife Service, Destination NSW and DPI&E. The purpose of the working group will be to ensure effective communication and operation around Snowy Mountains road safety during the operation and transportation of material to and from the segment factory, ensure that road users are informed of increased traffic/heavy vehicles in the region, ensure that road users are informed of roadworks being undertaken, etc.

• Intersection Upgrades

Prior to commencing the transportation of segments and concrete rings from the segment factory to the construction sites for Snowy 2.0 (for both the Snowy 2.0 Exploratory Works and Snowy 2.0 Main Works) the Proponent must as part of this approval upgrade the intersections that will be delivered by it as part of SSI 10034. These upgrades are as detailed in the table in Schedule 3, Condition 3 (i.e. the table above).

The designs for the intersection upgrades above must demonstrate they comply with the applicable requirements of *Austrroads Guide to Road Design* (as amended by the TfNSW supplements) and be approved by TfNSW prior to commencement of the associated upgrade works.

Prior to commencing any construction that is being undertaken by the Proponent they shall:

- Enter into a Works Authorisation Deed (WAD) with the TfNSW for upgrade works. To progress the WAD, the developer needs to email a copy of the conditions of development consent to development.southern@rms.nsw.gov.au. More information on WADs can be found at: www.rms.nsw.gov.au/documents/projects/factsheet-development-process.pdf
- Obtain Section 138 consent under the *Roads Act 1993* for the works associated with the WAD. TfNSW will be exercising its powers under Section 64 of the *Roads Act 1993* to become the roads authority for works associated with the WAD and therefore responsible for issuing the Section 138 consent for those specific works; and
- Apply for, and obtain a Road Occupancy Licence (ROL) from the TfNSW Traffic Operations Unit (TOU) prior to commencing roadworks on a State road or any other works that impact a travel lane of a State road or impact the operation of traffic signals on any road. More information on the ROL process and to lodge an ROL application, please visit <https://myrta.com/oplinc2/pages/security/oplincLogin.jsf>

• Heavy Vehicle Salvage

The Proponent must not commence the transportation of concrete segments and the associated concrete rings to the construction sites until details on how heavy vehicle salvage will be dealt with (e.g. plans/protocols, how road users will be kept informed, etc) so as to minimise impacts on the state road network have been provided to the satisfaction of TfNSW unless otherwise agreed to by the Planning Secretary. This must include, but not be limited to, a heavy vehicle tow service being on standby in the Snowy Monaro area on a permanent basis during the operation of the segment factory.

Context

- External road upgrades: TfNSW acknowledges that the proposal will require upgrades to the state roads that will be impacted by the proposed development. It is also acknowledged that the applicant's Response to Submissions (RtS) seeks to exclude most of the required works from the current SSI application and have them considered separately under Part 5 of the EPA Act by TfNSW. In this regard the following comments are provided:
 - TfNSW has now entered into an agreement with SHL in relation to what external road upgrades are required (refer to the Table in **Attachment 1**);
 - The current SSI application will need to include and assessment of the following intersection works:
 - o Snowy Mountains Highway/Sharp Street and its intersection with Bombala Street;
 - o Snowy Mountains Highway/Sharp Street and its intersection with Vale Street;
 - o Snowy Mountains Highway and its intersection with Rockforest (Russell Lot);
 - o Snowy Mountains Highway and its intersection with Marica Road; and
 - o The segment factory access/connection with Polo Flat Road.

In addition to the above TfNSW notes that Table 3.3 in the RtS lists the various intersections/infrastructure to be delivered by TfNSW on behalf of SHL. The following differences to what has been agreed to are advised:

- Snowy Mountains Highway and Tantangara Road: The proposal to reduce the posted speed limit in the vicinity of the intersection from 80km/h to 60km/h is not supported by TfNSW;
- Snowy Mountains Highway and Kosciuszko Road: Table 3.3 refers incorrectly to this intersection as a four-way intersection when the intersection is a three-way intersection; and
- Monaro Highway and Polo Flat Road: Table 3.3 incorrectly advises that this intersection will be upgraded to a two-lane roundabout. The intersection is to be upgraded to a single-lane roundabout.

- Reduction in predicted traffic generation:

TfNSW is supportive of any proposal that reduces the number of vehicle movements on the state road network. The use of PBS vehicles to transport concrete segments and rings presents numerous benefits in terms of reducing heavy vehicle movements, lessening infrastructure and customer impact which TfNSW supports.

- Working Group:

TfNSW acknowledges that a Snowy 2.0 Operations Working Group currently operates which provides benefits in relation to managing road impacts during any road construction works as well as the operation of the development. To ensure that Snowy 2.0 Operations Working Group continues for the life of the segment factories operation TfNSW is supportive of a condition that requires this to occur.

- Heavy Vehicle Salvage Plans/Protocols: Limited details have been provided in the submitted RtS on heavy vehicle salvage plans and protocols. TfNSW is concerned that given the volume of freight and logistics to be moved and the associated large number of heavy vehicles that will be using the state road network during the course of the project that the network will be exposed to increased heavy vehicle breakdowns in areas that have reduced communications coverage, a narrow carriageway, minimal shoulder/limited ability to pull off the roadway safely and varying weather conditions. This increasing the risk to other road users.

As such, sufficient measures need to be in place so as to minimise impacts on the other road users. In this regard a heavy vehicle tow service should be on standby in the Snowy Monaro area on a permanent basis for the duration of the project. The RtS suggests provision of a resource at critical locations and times of the project (refer to Table 4.7). It is unclear to TfNSW what the critical times and locations are. TfNSW is therefore supportive of a condition that requires further details to be provided including a requirement that a heavy vehicle tow service is on standby on a permanent basis for the life of the segment factory's operation.