

SWT19/00154 SF2019/238573 CB

10 December 2020

The Manager
Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Natasha Homsey

SSI-10040 - PROJECT ENERGY CONNECT (NSW - WESTERN SECTION)

I refer to your correspondence regarding the subject Application which was referred to Transport for NSW (TfNSW) for assessment and comment.

From the Environmental Impact Statement (EIS) prepared by TransGrid dated October 2020 it is understood that the proposal referred to as Project Energy Connect – (NSW-western Section) includes the construction and operation of new 330kV transmission lines between the SA/NSW border and Buronga, an upgrade and expansion of the existing Buronga substation from an operating capacity of 220kV to 330kV and an upgrade of the existing transmission lines between Buronga and the NSW/Victoria border.

From the information provided the proposed route for the transmission lines between the SA/NSW Border and Buronga will traverse multiple public roads including 3 classified roads - Renmark Road (MR68), Silver City Highway (HW22) and Pooncarie Road (MR68). The Buronga substation is located with frontage and access to Arumpo Road (MR431) which is also a classified road. The additional works between Buronga and the NSW/Victoria border will cross Arumpo Road (MR431) and the Sturt Highway (HW14).

The supporting documentation provided for the project refers to a number of issues that are still to be confirmed. Of particularly interest to TfNSW is the proposed sites for the construction compounds and the workers camps, the haulage routes for the large components and the proposed methodology for the stringing of the lines over public roads and waterways. Discussions held on 18 November 2020 attended by representatives of the proponent, DPIE and TfNSW acknowledged that additional information was required to address key transport related issues to allow for an informed assessment of the application.

TfNSW has reviewed the proposed site for the work camp to be located with frontage and access to the Silver City Highway north of Wentworth and has concerns regarding the location of the site remote from Wentworth within a high speed environment. It is understood that the information provided in the EIS does not reflect the latest intentions for the location of the workers camp and compound sites for this project. It is understood that there are now 2 sites considered for this purpose. One compound located near to the existing substation located to the north of Buronga and will be accessed from Arumpo Road (MR431). The other compound site located near Fort Courage Caravan Park and will be accessed via Renmark Road (MR68).

Both Arumpo Road and Renmark Road are classified roads and the impact of traffic generated by the proposed compound sites will need to be assessed by TfNSW. To enable this more detailed information is required in relation to the location of the site located on Renmark Road as well as a breakdown of the size and type, and number of vehicles required to access each site on a daily basis. The potential impact on the intersection of Renmark Road with the Silver City Highway will also need to be addressed.

Section 18.4.5 refers to the potential haulage routes however the submitted documentation provides limited information in relation to the number and size of the oversize and overmass (OSOM) vehicles required to deliver components, including substations. The documentation lists four potential haulage routes depending on the port of origin of the components, including from Melbourne and Adelaide. The information provided does not currently address details of potential pinch points and specific mitigation measures required. More detailed information is required to allow for an informed assessment of the potential impacts on the road network.

The logistics associated with the transportation of materials for the development needs to be addressed. When the preferred haulage route is selected a full and independent risk analysis and inspection of the route may be required to be prepared and supplied for comment. Further analysis and reporting to assess possible damage to, and repair of the route will be required on a regular basis.

The construction of temporary access tracks to the construction works from the public road network will require assessment and approval from the relevant road authority prior to construction. Access driveways to the classified road network shall be kept to a minimum. Table 18-4 TA1 lists the proposed mitigation measures to address access related issues. In additional to the items listed the following items need to be considered.

As a minimum any driveway to a construction compound or camp site from the classified road network shall be constructed as a rural property access driveway as per the Austroads Guide to Road Design to a minimum width to accommodate 2 way traffic and be sealed for at least 10 metres from the edge of the carriageway. Access driveways to the public road network shall be located at a site that complies with the required sight distance criteria as per the Austroads Guide to Road Design for the posted speed limit and be designed for the swept path of the largest vehicles likely to access that driveway. TA1 refers to the potential need for acceleration and deceleration lanes at access driveways to construction compounds and camp site locations.

The methodology for the stringing of power lines across the road reserve of public roads shall be outlined in the documentation. A section 138 approval and a Road Occupancy Licence will be required for works within the road reserve of a classified road.

A Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Transport for NSW) to outline measures to manage traffic associated with the construction and operation of the development including the movement of plant and components to the site. The Traffic Management Plan for the movement of oversize plant to the site shall involve the appointed transport contractor. The plan shall focus on the management of traffic generated by the development, the potential impacts, the measures to be implemented, and the procedures to monitor and ensure compliance. It shall address, but not necessarily limited to:

- measures to be employed to manage the movement of construction and worker vehicles to the site to limit disruption to other motorists, emergency vehicles and school bus timetables
- ii) precautionary measures such as signage to inform other road users of the construction activities for the project,

- iii) Details of traffic routes to be used by heavy vehicles associated with the project, including any necessary route or time restriction for oversized vehicles,
- iv) the details of any oversize and overmass haulage, including exact transport routes, road-specific mitigation measures, haulage timing, etc and any special permits required to be obtained,
- measures to maximise the use of a low frequency (regular) trucking schedule rather than intermittent high frequency (campaign) trucking schedule to minimise convoys or platoons,
- vi) Proposed hours for construction and plant movement activities,
- vii) any required changes to the existing road environment along the proposed routes such as intersection upgrade, road widening, temporary street closures, removal and replacement of road infrastructure, etc, and
- viii) contingency plans to address disruptions to haulage due to low visibility eg heavy rain periods, fog etc or closure of the haulage route,
- ix) a Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc and appropriate penalties for infringements of the Code,
- x) appropriate vehicle maintenance and safety,
- xi) emergency response plans,
- xii) procedures for informing the public where any road access will be restricted as a result of the project,
- xiii) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements, and
- xiv) procedures to provide for training and compliance with and enforcement of the plan.

A Plan shall be prepared in consultation with the relevant road authorities to outline measures to manage the movement of workers to the project site to address fatigue related issues. The plan is to provide initiatives to reduce traffic commuting to the development site by facilitating shuttle bus services. The plan is to include regular consultation with Council, Transport for NSW and NSW Police to address commuter traffic and commuter traffic related incidents on public roads.

Transport for NSW does not object to the development in principle but request that the issues outlined above be addressed.

Any enquiries regarding this correspondence may be referred to the Manager, Land Use, TfNSW (South West Region), Maurice Morgan, phone (02) 6923 6611.

Yours faithfully

Jonathan Tasker

Acting Director South West

Transport for NSW

Annexure A – Region West

Specifications for Works in Classified Road Reserves (items do not apply if struck out)

1) General Requirements for classified State AND Regional roads

- a) Surface works are to be located outside the clear zone or made frangible (as set out in Table 4.1 of *AUSTROADS Guide to Road Design* Part 6) and as far from the road centreline as practicable, particularly on the inside of curves.
- b) Concurrence by TfNSW does not imply that works meet NSW Environmental and Planning Laws. Consult with the local Council if in doubt. Any proposed disturbance or removal of vegetation within the road reserve needs to have a statutory environmental assessment carried out by a qualified environmental assessor.
- c) Utilities are to cross at near perpendicular to the centreline of the road and shall be located at least 30m from road intersections (other than private driveways). In the nature strip, set back as far as practicable from the road edge.
- d) All materials and work methods used are to comply with or exceed the relevant AS/NZS Standards.
- e) The applicant shall extend public liability insurance coverage for TfNSW for an amount of not less than \$20,000,000 for each single occurrence and unlimited in the aggregate or as otherwise agreed in writing. TfNSW shall also be indemnified by the works or utility owner from and against all actions, suits, proceedings, losses, costs, damages, charges, claims and demands in any way arising from the proposed work.
- f) TfNSW cannot guarantee the location of existing underground services, if any. You must satisfy yourself as to their existence and location. Contact Dial Before You Dig and pothole onsite (with approval) if needed.
- g) The road, its appurtenances and the remainder of the road reserve is to be restored and kept restored to a condition at least equal to that applying before any work is commenced.
- h) Markers shall be erected indicating the exact location of the works or utility within the road reserve so that at least two markers are visible from any portion of the road reserve within ten metres of the longitudinal alignment of the work. The markers shall include the address and phone number of the utility owner's local representative.
- i) Responsibility and future maintenance costs relating to the works or utility remains with the works or utility owner.
- j) The applicant shall provide Work-As-Executed (WAE) plans to westernlandaccess@rms.nsw.gov.au upon completion, indicating final positions of constructed infrastructure, levels, lengths, and other significant features.

2) Requirements for classified State roads only

- k) Utilities are to have a minimum depth of 2.4m below the road surface, 1.0m below the invert of table drains, and 0.75m elsewhere in the road reserve.
- I) Thrust or directional boring of utilities is to be used underneath State Roads. Any outer sleeve pipe (encasement) shall extend for the full width of the zone of influence under the road pavement and table drain or kerb and gutter.
- m) Pipes carrying pressurised fluids (e.g. water or sewer rising mains) under roads are to be sleeved in steel or ductile iron (DICL), continuously welded. Consider grouting to minimise maintenance, as determined by the water agency.
- n) Conduits carrying high risk utilities such as electricity or gas under roads shall be sleeved within a high-density polyethylene (HDPE) pipe, and cement grout pumped to fill the annular void.
- o) If open trenching of road is permitted, works shall comply with Specification M209 Road Openings and Restoration.
- p) Traffic Control is to be carried out in line with the *RMS Traffic Control at Worksites Manual* available at https://www.rms.nsw.gov.au/business-industry/partners-suppliers/documents/technical-manuals/traffic-control-atworksites-manual.pdf and the Traffic Controller must hold Category G 'Traffic Control' registration.
- q) Give at least 48 hours' notice to TfNSW before commencement. Quote our application ref. number.

3) Road Occupancy Licence (ROL) and temporary Speed Zone Authorisation (SZA)

An SZA will be required where the Traffic Control Plan requires a temporary reduction in speed limit during works. SZAs for works on classified **Regional** roads shall be applied for through the local Council rather than TfNSW.

Any activity likely to impact operational efficiency of the **State** road network will require an ROL, and if applicable an SZA, from TfNSW. This may include an on-road or off-road activity that requires use of the **State** road or may affect traffic flow, or any works within 100 metres of traffic signals **on any road**.

Applications to TfNSW for ROLs and/or SZAs must be submitted at least ten working days prior to commencement of work. Apply via the TfNSW Online Planned Incident (OPLINC) web page (myrta.com/oplinc2/pages/security/oplincLogin.jsf). If you need assistance please phone the TfNSW Road Access Management Unit on 1300 656 371 or email: Road.Access@rms.nsw.gov.au