

Submission on the Supplement to the draft EIS

TNG Limited – Darwin Processing Facility

This submission is made under clause 9 of the Environmental Assessment Administrative Procedures 1984 and section 296 of the *Environment Protection Act 2019*

Government authority: Transport, Civils Services Division (Department of Infrastructure, Planning & Logistics)

Section of Supplement		Comment
Appendix D – Traffic Impact Assessment	4.4.2 Level Crossing Delays	<ul style="list-style-type: none"> • The TIA identifies a 17 minutes delay for vehicles at the existing level crossings for a train passing at 5 km/hr speed (which will be the most likely speed) and the queue length will be 928m and 684m along Channel Island Road (CIR) and Jenkins Road respectively. This is a significant delay and not acceptable as CIR leads to major operations and strategic developments like Inpex, Santos, PWC power station and future Middle Arm development. • The TIA has also not provided impacts at the existing intersections, bridges etc. due to this delay. The delay at the existing level crossing will also have a significant impact on emergency access to, or evacuations from, any incident at these developments. CIR is the only route providing access to the major developments and it is crucial to provide uninterrupted flow along CIR for its effective functioning. • The TIA identifies an area for rail siding within the proposed lot. TNG needs to confirm that all siding / loop line bifurcation happens within the proposed lot boundary. If the bifurcation of the loop line for the siding is proposed to happen outside of the lot boundary this will impact on DIPL's ability to develop a grade separation arrangement for the CIR/Weddell Freeway intersection planned for the future. • The TIA does not address the issue of transportation of waste material generated as a result of the manufacturing process. If the waste is transported to an offsite location it is unclear how this will be transported-by rail or road? • The raw material to the site will be transported to the site by trains coming from south (6 times a week) and finished product will be transported to the Darwin Port (7 times a week). It is unclear how the change of locomotive is proposed to happen within the lot boundaries. • The TIA does not provide any details regarding the internal access road connecting the north and south development. As this road is adjacent to the mangrove area, this will be subject to the tidal current and may impact on the flood immunity. It is also unclear who will own the road-TNG or NTG? • The TIA identifies that there is need for 636 vehicles per day to access the development during operation. It is unclear if there is sufficient area to provide car parking for these vehicles. It is also unclear if a bus is proposed to ferry staff to and from the development, where would be the park and ride facilities established within the Greater Darwin Area.

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		<ul style="list-style-type: none"> • The TIA identifies the emergency exit point on the northern part of the development, required to cross the rail line is ~550m south from the Elizabeth River Bridge. There will be a need to keep this access closed at all times to prevent unauthorised use of this emergency exit. This may be an issue when the Weddell Freeway alignment is designed. • To understand potential solutions and mitigations further discussions with TCSD and the Rail Operator are required.
<p>Table ES-6 (Summary of the NT EPA Environmental Factors included in the Darwin Processing facility Supplement to the EIS & Appendix-G-Air-Quality-Assessment</p>	<p>Air Quality - Additional potential Impacts</p>	<ul style="list-style-type: none"> • There are significant transport assets owned by the Department in the vicinity of the project-Elizabeth River Pontoon, Jetty, Rail Bridge and Road Bridge. It is unknown what impact the air quality will have on these assets as these are made of aluminium, steel and concrete. Would there be a need for increased maintenance or changed maintenance regime and if yes what would be the financial impact.