

COUNCIL REFERENCE: 3A07/1008-05 (D12/165643)
CONTACT PERSON: John Britton
YOUR REF:

19 July 2012

Department of Planning & Infrastructure - Major Project Assessments
GPO Box 39
SYDNEY NSW 2001

Attention: Deana Burn

Dear Madam

**Shoalhaven Starches Bomaderry
Modification Application (MP06_0228 MOD 3)**

I refer to your letter dated 28 June 2012 seeking comments concerning the proposed modification relating to the Shoalhaven Starches Expansion Project. The proposal is to incorporate an additional lot into the project approval and relocate the approved staff car park to that lot with access to Bolong Road.

The documents have been reviewed and Councils preliminary comments are as follows:

The new staff car park

The proponent has indicated the car park will be designed to comply with AS2890 in all respects and this is supported. Appropriate line marking and internal signage should be installed to mitigate conflicts between cars and trucks using the common access and manoeuvring areas.

Car parking spaces are proposed to be the very minimum width under Australian Standards, although the aisle width proposed is considerably wider presumably to compensate for this. Further, we note the ARC traffic study recommends provision of a suitable turnaround area at the western end of the car park which is supported. Provision should be made for at least 2 spaces that meet the additional requirements for people with a disability.

Accordingly modification approval should be conditioned as follows:

“A suitable turnaround facility is to be provided at the western end of the car park to facilitate safe efficient turnaround for those vehicles that could not find a car park”; and

“Applicant is to consider providing an overflow car parking area (gravel all weather surface) at the western end of the car park to accommodate overflow car parking on site.”

Council requests the submission of detailed plans for approval.

Landscape and visual screening

The proponent has submitted a landscape masterplan that is consistent with the plan submitted as part of the recent Mod 2 application. Project approval condition 43 provides for the landscaping requirements and this is still applicable to the Mod 3 application. Sufficient landscaping is seen as a crucial consideration. In the past Council has been extremely disappointed at the complete disregard of any substantial landscaping, at one of the key entrances to Bomaderry.

Landscape and Vegetation Management

43. The Proponent shall prepare and implement a Vegetation Management Plan for the project to the satisfaction of the Director-General. This plan must:

- a) be prepared in consultation with DWE and Council and be submitted to the Director-General for approval within 6 months of this approval;*
- b) be prepared in accordance with DWE's Guidelines for Controlled Activities – Vegetation Management Plans; and*
- c) include:*
 - a Landscape Plan for the project, which identifies screen plantings to minimise visual impacts;*
 - detailed plans and procedures to:*
 - restore and maintain the waterways and riparian zones of Shoalhaven River, Bomaderry Creek, Abernethy's Creek and Broughton Creek on the site;*
 - manage weeds in the vicinity of the riparian zones;*
 - integrate works into the proposed landscaping for the rest of the site;*
 - manage impacts on fauna; and*
 - monitor the performance of the proposed restoration works*

Council supports the concept plan and requests the Department include a requirement that the landscaping be implemented within six (6) months of the completion and use of the car park and access road.

Connection with Bolong Road

Shoalhaven Starches own the site known as the "old Dairy Farmers site" that is east of the project area. As part of the DF redevelopment a new access was constructed under a Part 4 approval issued by Council. This access is integrated with the Bolong Road upgrade that has been required under the project approval. Council has received verbal advice from the Roads and Maritime Service (RMS) that the 100/60 kph speed limit will be moved to the east of the DF access in the near future.

The proponent has been requested to submit works-as-executed plans (WAE) for the Bolong Road works as part of the project approval. These have not been submitted and are necessary to assess the suitability of the Mod 3 works when details are submitted.

Council requests the Department to remind the proponent of this outstanding requirement and also to include this requirement for Mod 3.

Specific comments from Council's Traffic and Transport Manager

The Traffic report by ARC Traffic + Transport (ARC) has been reviewed and its proposals generally supported. Council is aware of the RMS submission to DPI and requests the additional conditioning. Specific comments are as follows:-

- The recent RMS decision to move the 60/100 kph speed zone change to a new location 140m west of Hanigans Lane has design consequences at the location of Dairy Farmers access. The existing access lies within a 100kph speed zone. When the signs are eventually moved (over the coming months) it will be appropriate to reduce the design standard in regards to some aspects of the access.
- The left turn acceleration lane has already been designed based on 80kph design speed.
- In preliminary discussions with RMS it has been agreed that in light of the speed zone change; both the right turn entry treatment (CHR) and the left turn entry treatment (minimum AUL but most likely CHL) shall be designed based on 80kph design speed.
- Because Bolong Road is a classified main road (MR293) Council cannot issue Section 138 approvals without having concurrence from RMS to the design, accordingly based on the preliminary discussions with RMS the speed design parameters need to be included as conditions of consent.
- The ARC traffic impact study recommends that the intersection of Dairy Farmers access / Bolong Road be upgraded from CHR(S) to full CHR, this is agreed and an appropriate condition is as follows:

“Upgrade the right turn treatment at the intersection of Dairy Farmers access / Bolong Road (right turn into the site from Bolong Road) from CHR(S) to rural CHR, in accordance with AUSTRROADS standards, including shoulder provision in accordance with standards, design to be based on 80kph design speed, to the satisfaction of Council and NSW Roads & Maritime Services.”

- The ARC traffic impact study recommends that the intersection of Dairy Farmers access / Bolong Road be upgraded from BAL to full AUL. It is agreed that the left turn treatment needs to be constructed as a separate left turn deceleration lane, however in the very narrow timeframe provided to consider the application. It is felt that a CHL may provide more appropriate and safer form of intersection due to the increase in left turning traffic anticipated (noted by ARC), the higher proportion of trucks using the access, and presence of recreational cyclists along Bolong Road. Accordingly if feedback is required urgently to the department as requested the left turn treatment should have an appropriate condition as follows:

“Upgrade the left turn treatment at the intersection of Dairy Farmers access / Bolong Road (left turn into the site from Bolong Road) from BAL to rural CHL, in accordance with AUSTRROADS standards,

including shoulder provision in accordance with standards, design to be based on 80kph design speed, to the satisfaction of Council and NSW Roads & Maritime Services.”

- Council is aware of many aspects of the works recently completed in Bolong Road that do not comply in all respects with standards or the approved design. This will also affect the assessment of the works required under this modification (upgrade of the intersection of Bolong Road / Dairy Farmers access). Accordingly modification approval should have an appropriate condition as follows:

“A full works as executed drawing showing the constructed works overlaid against the approved designs must be prepared and submitted to Council in the first instance for all road and rail works undertaken under the major project approval to date. Rectification works may be required at the discretion of Council, in consultation with RMS.”, and

“Council may not issue 138 approval for any new works (including works associated with this modification) if it is not satisfied that all road and rail works undertaken to date under the major project approval have been undertaken in accordance with standards and the approved design plans, or if design of all rectification works are not included with the designs submitted for works required under this modification”.

- The ARC traffic impact study recommends that the existing informal access to the east of AP1 be removed. This was an original coordinated condition of approval of Council and RMS to remove this and other informal access points used at the time. It is disappointing that Shoalhaven Starches have not taken any action to remove this access (which was never approved) in the interest of safety. Accordingly modification approval should have an appropriate condition as follows:

“Remove the existing informal access to the east of AP1 by removing the physical access and reinstating the shoulder, verge, table drain, and nature strip within the road reserve to the same condition as the shoulder, verge, table drain, and nature strip adjacent to the access point, to the satisfaction of Council and NSW Roads & Maritime Services. Reinstatement of continuous fence along the boundary. A gate will not be accepted. Undertake appropriate landscaping within the site boundary at this location, consistent with the landscape master plan, to remove any evidence of the access.”

- The ARC traffic impact study recommends a footpath connecting the new car park to the existing footpath adjacent AP1, and that pedestrian paths within the site be reviewed. The plan showing extent of footpath works is generally agreed. Accordingly modification approval should have an appropriate condition as follows:

“Extend the existing footpath on Bolong Road (southern side) from the AP1 access, continuing east to a location adjacent the eastern extent of the new car park, and provide a gated access at the boundary and footpath connection to the car park, to the satisfaction of Council including provision of appropriate lighting of the pedestrian pathway in accordance with standards”;

“Undertake a review of pedestrian movements on site and prepare a car parking and pedestrian management plan including identifying pedestrian accessibility and safety improvements, including but not limited to the extension of footpath along Bolong Road, all paths currently shown on the plans subject of the modification (except modified at eastern end of the car park to link to the proposed path along Bolong Road) , and general pedestrian safety improvements at all vehicle access points and where all pedestrian desire lines conflict with vehicles on site, to the satisfaction of Council”; and

“Prepare a plan of works to address the recommendations of the car parking and pedestrian management plan, to the satisfaction of Council”

- The use of the Dairy Farmers access as a defacto turnaround area was only approved by Council and RMS on a trial basis. Works under this modification will further reinforce the Dairy Farmers access as a more permanent turnaround arrangement which relocates turning movement conflicts into a higher speed zone. Physical works must be undertaken to provide greater appearance of the 60kph speed zone environment, if to achieve greatest benefits from the relocation of the 60/100 speed zone change, and following preliminary discussions this position is supported by RMS and formed part of their consideration of relocation of the speed zone. Accordingly modification approval should have an appropriate condition as follows:

“Extend the existing median from the eastern side of the AP1 access, continuing east to the location of Dairy Farmers access, terminating to the eastern side of the Dairy Farmers access, leaving a minimum gap at the Dairy Farmers access only, sufficient to accommodate turning movements at the Dairy Farmers access only, to the satisfaction of Council and RMS. The median shall be of minimum 900mm width for most of the mid-block length (between AP1 and Dairy Farmers access) however will taper to increased width to accommodate the physical channelization required as part of the CHR / CHL designs to the satisfaction of Council and RMS”; and

“Lighting must be upgraded at the Bolong Road / Dairy Farmers access in accordance with standards, including addressing the eastern termination of the median to the east of the Dairy Farmers access”

- Re the internal turnaround island inside the Dairy Farmers access; this requires construction as a physical (raised) facility, accordingly modification approval should have an appropriate condition as follows:

“In regards to the proposed turnaround island immediately inside the Dairy Farmers Access the applicant is to construct this island as a physical (raised) treatment to the satisfaction of the Local Shoalhaven Traffic Committee.”

- Re signs / lines, the modification approval should have an appropriate condition as follows:

“Applicant is to provide a detailed signs / lines plan for all aspects of the rectification works required and for all works required under this modification, to the satisfaction of the Local Shoalhaven Traffic Committee”

Should you require any additional information please contact John Britton, Part 3A Coordinator on (02) 4429 3432. Please quote Council’s reference 3A07/1008-05.

Yours faithfully

Tim Fletcher
Director Development & Environmental Services