



28 January 2021

File No: NTH19/00212/04

Your Ref: SSD-8530563

The Director  
Major Projects Section  
Department of Planning Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Katelyn Symington

Dear Madam,

**RE: Major Project (SSD 8530563) Gunnedah Waste Facility – Review of EIS  
Lots 1 & 2 DP 1226992 - 16 Torrens Road Gunnedah**

I refer to your email dated 15 December 2020 requesting input from Transport for NSW (TfNSW) into the Environmental Impact Statement (EIS) for the abovementioned development proposal. The documents were provided to TfNSW through the NSW Planning Portal.

**Roles and Responsibilities**

The key interests for TfNSW are for the safety and efficiency of the transport network, the integrity of State infrastructure and the integration of land use and transport in accordance with *Future Transport Strategy 2056*.

The Oxley Highway (HW11) and Kamilaroi Highways (HW29) are both classified (State) roads and Gunnedah Shire Council is the Roads Authority for all public roads (other than freeways or Crown roads) in the local government area pursuant to Section 7 of the *Roads Act 1993*. TfNSW is the Roads Authority for freeways and can exercise roads authority functions for classified roads in accordance with the Roads Act. Any proposed works on a classified (State) road will require the consent of TfNSW and consent is provided under the terms of a Works Authorisation Deed (WAD).

In accordance with Clause 104 of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP), TfNSW is given the opportunity to review and provide comment on the subject development application as it meets the requirements under Schedule 3.

**Transport for NSW Response**

It is understood that the proposal is for a waste facility to handle up to 250,000 tonnes of waste per annum and will likely include transport of material by up to 126 laden truck/dog trips/week and 90 laden B-Double trips/week (section 11.2 of the TIA). The development is a State Significant Development and being defined under ISEPP as '*Waste or resource management facilities*' it is Traffic Generating Development.

TfNSW has reviewed the documents provided, including the Traffic Impact Assessment (TIA) and while this Agency has no objection to the development, we have identified a number of traffic/transport matters needing further investigation or clarification. These are summarised below to assist the consent authority in determining the application.

1. Traffic assumptions in the TIA appear to produce an underestimation in traffic generation numbers including:
  - The payload of B-Double used in the document is 53 tonnes and this is significantly higher than average payload of a B-Double even at HML;
  - The proponent assumes the majority of material will be hauled to/from the site by only truck & dog at 38 tonne payload and B-Double at 53 tonne payload. It is noted that the proponent also identifies in the TIA that other types of trucks such as rigid and light vehicles will be entering/exiting the site.

It is requested that the proponent confirm traffic generation numbers, addressing the matters raised and as based on the submitted information. This will lead to an assumption of 20 incoming heavy vehicle trips per day. If the majority of traffic is via rigid trucks, the number of trips would be significantly higher. It is suggested that once numbers are confirmed, weekly and hourly HV generation rates be referenced in any approval granted.

2. Site Access from Torrens Road (the main site access) only allows general access vehicles. TfNSW's road access team identifies that Torrens Road is not on either the PBS 2A or the 25/26 m RAV B-double network.

In order for the proponent to legally operate the larger vehicles, a permit from the Heavy Vehicle Regulator (NHVR) will be required. The proponent will need to work and consult with Gunnedah Shire Council to provide their consent for heavy vehicle access on this road.

3. There are discrepancies in regards to staff numbers throughout EIS and TIA. This anomaly should be addressed.
4. Allgayer Dr (industrial area) also has a connection to the Kamilaroi Hwy at Matthias Rd. There appear to be no separate left and right-turn lanes. The intersection would need upgrading if it is to be used by the development (possibly to a BAR). If it is not proposed for access, HVs should be restricted from using this route
5. The TIA claims that a through vehicle can pass a right-turning vehicle at the intersection of Quia and Torrens Rd. The widths are not quantified and it appears that a BAR does not exist. It might be the case for 2 light vehicles (LV) but not for articulated heavy vehicles (HV) with greater swept paths. The existing guardrail would not comply with BAL requirements. This should be further investigated and addressed by provision of swept paths to demonstrate the safety impacts for increased turning traffic.
6. MEX Depot access details were not quantified in the TIA and therefore it is no possible to check if they meet AS2890 requirements. Swept paths appear to indicate that a B-Double cannot exit onto the correct side of the road. This should be reviewed.
7. The consent authority needs to be satisfied that the safety impacts of the development have been considered at all relevant intersections, not just the capacity issues. Any mitigation measures should be clearly identified and specified in the conditions of any consent issued.

TfNSW highlights that in determining the application under the *Environmental Planning and Assessment Act 1979*, it is the Consent Authority's responsibility to consider the environmental impacts of any roadworks which are ancillary to the development. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of project approval.

If you have any further enquiries regarding the above comments please do not hesitate to contact Cheryl Sisson, Development Assessment Officer or the undersigned on (02) 6640 1362 or via email at: [development.northern@rms.nsw.gov.au](mailto:development.northern@rms.nsw.gov.au)

Yours faithfully,



for Leisa Sedger  
A/Manager Land Use Assessment Northern  
Regional NSW and Outer Metropolitan  
Transport for NSW