



4 August 2021

File No: NTH21/00172/01
Your Ref: SSD-23515853

The Director
Major Projects Section
Planning Industry & Environment

Attention: natasha.homsey@planning.nsw.gov.au

Dear Sir / Madam,

**RE: Response to SEAR – Proposed Armidale Battery Energy Storage System
Lot 737 DP75580889 Eathorpe Road Armidale**

I refer to your email dated 30 July 2021 requesting input from Transport for NSW to the Secretary's Environmental Assessment Requirements (SEARs) for the abovementioned development proposal. The application was referred to TfNSW through the NSW Major Projects Portal.

Roles and Responsibilities

The key interests of TfNSW are 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*.

Eathorpe Road is Local Road and Waterfall Way (MR76) is a classified (State) road. Armidale Regional 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 101 of the *State Environmental Planning Policy (Infrastructure) 2007* the Consent Authority is to have consideration for the safety, efficiency and ongoing operation of the classified road as the development has frontage to a classified road. TfNSW is given the opportunity under Clause 104 to comment on traffic generating developments listed under Schedule 3. The EIS should identify if the proposed development triggers the provisions of Schedule 3 by virtue of the amount of traffic during construction.

Transport for NSW Response

TfNSW understands that while the site has frontage to the Waterfall Way, access to the development is proposed from Eathorpe Road which is a local road.

TfNSW requests that a Traffic Impact Assessment (TIA) be prepared by suitably qualified person/s in accordance with the Austroads Guide to Traffic Management Part 12, the complementary TfNSW Supplement and RTA Guide to Traffic Generating Developments. The TIA should include, but not necessarily be limited to, an assessment of the considerations outlined in **Attachment A**.

It should also be noted 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.

TfNSW would be willing to review draft findings of the TIA if the proponent so-desires. If you have any further enquiries regarding the above comments please do not hesitate to contact John Perkins, Development Services Case Officer or the undersigned on (02) 6640 1362 or via email at: development.northern@transport.nsw.gov.au

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Matt Adams', is placed over a light blue rectangular background.

for Matt Adams
Team Leader, Development Services
Community and Place | Region North
Regional & Outer Metropolitan
Transport for NSW

Enc. ATTACHMENT A - Requested TIA consideration for SEAR

ATTACHMENT A - Traffic Impact Assessment – Requested considerations for SEAR

For context, this attachment must be read with TfNSW letter of 4 August 2021 – Ref: NTH21/00172/01

Traffic Impact Assessment (TIA) be prepared by suitably qualified person/s in accordance with the Austroads Guide to Traffic Management Part 12, the complementary TfNSW Supplement and RTA Guide to Traffic Generating Developments.

The TIA is to identify the impacts of the development and the proposed on-site and off-site measures proposed to mitigate the impacts of the development on any road or rail related infrastructure. The TIA must explain and justify all inputs informing the proposed mitigation measures and TIA conclusions.

The TIA should be tailored to the scope of the proposed development and include, but not necessarily be limited to, consideration of the following;

- A map of the site and surrounding road network identifying the intended site access, nearby accesses, intersections and transport related facilities. The status of each road should be noted and any crown land should be identified.
- A map of the proposed transport route/s identifying all public roads proposed to obtain access from the classified (State) road/s to the development site.
- The total impact of existing and proposed development on the road network with consideration for a 10 year horizon. This should include;
 - Identify Annual Average Daily Traffic (AADT) volumes with percentage heavy vehicles along the transport route/s and diagrammatically demonstrate AM and PM peak hour movements at key intersections.
 - Background traffic data from published sources and/or recent survey data. The source of data and any assumptions are to be clearly explained and justified, including the growth rate applied to the future horizon. Due to the impact of COVID-19 on travel patterns, traffic counts undertaken at this time may not be representative of normal volumes. Alternative approaches to understanding the impact of COVID-19 on traffic patterns should be discussed with TfNSW.
 - The volume and distribution of existing and proposed trips to be generated by the construction, operational and decommission phases of the development. This should identify the maximum daily and hourly demands generated by the development, particularly where they coincide with the network peak hour.
 - The type and frequency of design vehicles accessing the development site. It should be noted that the local roads proposed to access the development may not be approved for B-doubles, and if such vehicles are proposed, approval will be required from the National Heavy Vehicle Regulator (NHVR)
- Details of the road geometry and alignment along the identified transport route/s, including existing formations, crossings, intersection treatments and any identified hazards. This should include;

- Available sight distances at the site access and nearby intersections and any constraint to achieving the required sight distance for the posted speed limit.
 - Available sight distances at intersections along the proposed transport routes and any constraint to achieving the required sight distance for the posted speed limit.
 - An assessment of turn treatment warrants in accordance with the Austroads Guide to Traffic Management Part 6 and Austroads Guide to Road Design Part 4A for intersections along the identified transport route/s, identifying the existence of the minimum basic turn treatments and addressing the need for any warranted higher order treatments.
 - Swept path analysis demonstrating the largest design vehicle entering and leaving the development, and moving in each direction through intersections along the proposed transport route/s.
- Capacity analysis using SIDRA or other relevant application, to identify an acceptable Level of Service (LOS) at intersections with the classified (State) road/s, and where relevant, analysis of any other intersections along the proposed transport route/s.
- To ensure road safety requirements are met. Pavement condition and strength deficiencies need to be addressed based on the cumulative impacts of the interaction of traffic associated with the subject development and surrounding land use.
- A review of crash data along the identified transport route/s for the most recent 5 year reporting period and an assessment of road safety along the proposed transport route/s considering the safe systems principles adopted under Future Transport 2056.
- Strategic (2D) design drawings of all proposed road works and the site access demonstrating scope, estimated cost and constructability of works required to mitigate the impacts of the development on road safety, traffic efficiency and the integrity of transport infrastructure. Works must be appropriately designed for the existing posted speed limit.
- Site plan demonstrating site access, internal manoeuvring, servicing and parking areas consistent with the relevant parts of AS2890 and Council requirements.
- Details of measures to address impacts and/or provide connections for public transport services and active transport modes, such as, public and school bus services, walking and cycling.
- Details of measures to ameliorate the impacts of road traffic noise, dust, and/or glare generated along the proposed transport route/s.
- Details of any Traffic Management Plan (TMP) proposed to address the construction, operation and decommission phases of the proposed development. The TMP may include temporary measures such as a Traffic Guidance Scheme (TGS) prepared and implemented by suitably qualified persons in accordance with the current *Traffic Control at Work Sites Manual*. It is recommended that any TMP adopt a Driver Code of Conduct, including but not necessarily limited to, the following;
 - A map of the primary transport route/s highlighting critical locations.
 - An induction process for vehicle operators and regular toolbox meetings.
 - Procedures for travel through residential areas, school zones and/or bus route/s.
 - A complaint resolution and disciplinary procedure.
 - Community consultation measures proposed for peak periods.

Where road safety concerns are identified at a specific location along the proposed haulage routes, TfNSW suggests that the TIA be supported by a targeted Road Safety Audit undertaken by suitably qualified persons in accordance with the Austroads Guidelines.

Any regulatory facility will need to be referred to Council's Traffic Committee for consideration and a recommendation.

Any roadwork on classified (State/Regional) road/s is to be designed and constructed in accordance with the current Austroads Guidelines, Australian Standards and [TfNSW Supplements](#).

The developer will be required to enter into a Works Authorisation Deed (WAD) with TfNSW for any roadwork deemed necessary on the classified (State) road. The developer will be responsible for all costs associated with the roadwork and administration for the WAD. It is recommended that developers familiarise themselves with the requirements of the WAD process. Further information can be obtained from the TfNSW [website](#).