

27 April 2022

Our Ref: STH05/00332/06

Your Ref: DA404-11-2022-I-MOD-14 (PAE-40884867)

Sally Munk

Department of Planning & Environment

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**DA404-11-2022-I-MOD-14, BERIMA CEMENT WORKS MODIFICATION, LOT: 1 & 22 DP: 582277 & LOT: 2 DP: 774598 & LOT: 100 DP: 882139, TAYLOR AVENUE, NEW BERIMA**

I refer to the abovementioned Development Application (DA) referred to Transport for NSW (TfNSW) on 11 April 2022.

TfNSW has completed an assessment of the DA, based on the information provided and focusing on the impact to the state road network. For this DA, the key state road is the Hume Motorway.

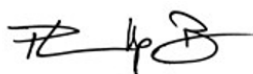
TfNSW notes the following:

- DP&E is seeking advice from TfNSW to assist in its assessment under Section 2.121 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*;
- DP&E is also seeking advice from TfNSW in accordance with *Clause 2.22 of the State Environmental Planning Policy (Resources and Energy) 2021*;
- The proposed access arrangements shown in **Attachment 1**;
- The DA would generate additional traffic. The impact of this traffic needs to be considered and adequately mitigated; and
- The DA proposes access to the Old Hume Highway which is a Regionally Classified Road managed by Wingecarribee Shire Council. TfNSW concurrence, under Section 138 of the Roads Act 1993, is required for the new access point for the haul road.

The application does not provide enough information to assess the development. TfNSW requires the matters outlined in **Attachment 2** to be addressed. The comments in **Attachment 3** are provided for Council's information/consideration.

Should you require further information please contact Phillip Pitt, Development Case Officer on 02 8202 1223 or by emailing [development.south@transport.nsw.gov.au](mailto:development.south@transport.nsw.gov.au).

Yours sincerely



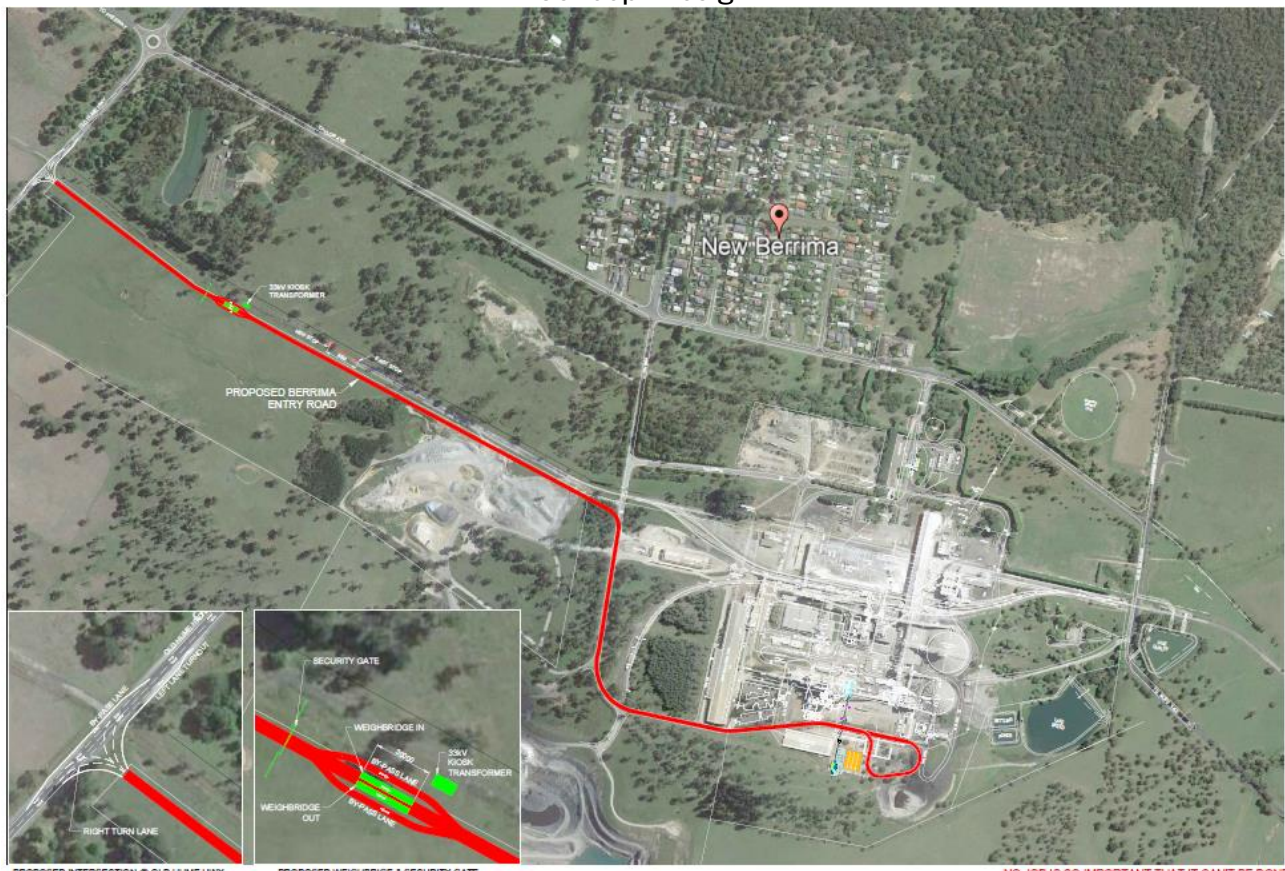
**Phillip Pitt**

Development Case Officer, Development Services (South Region)

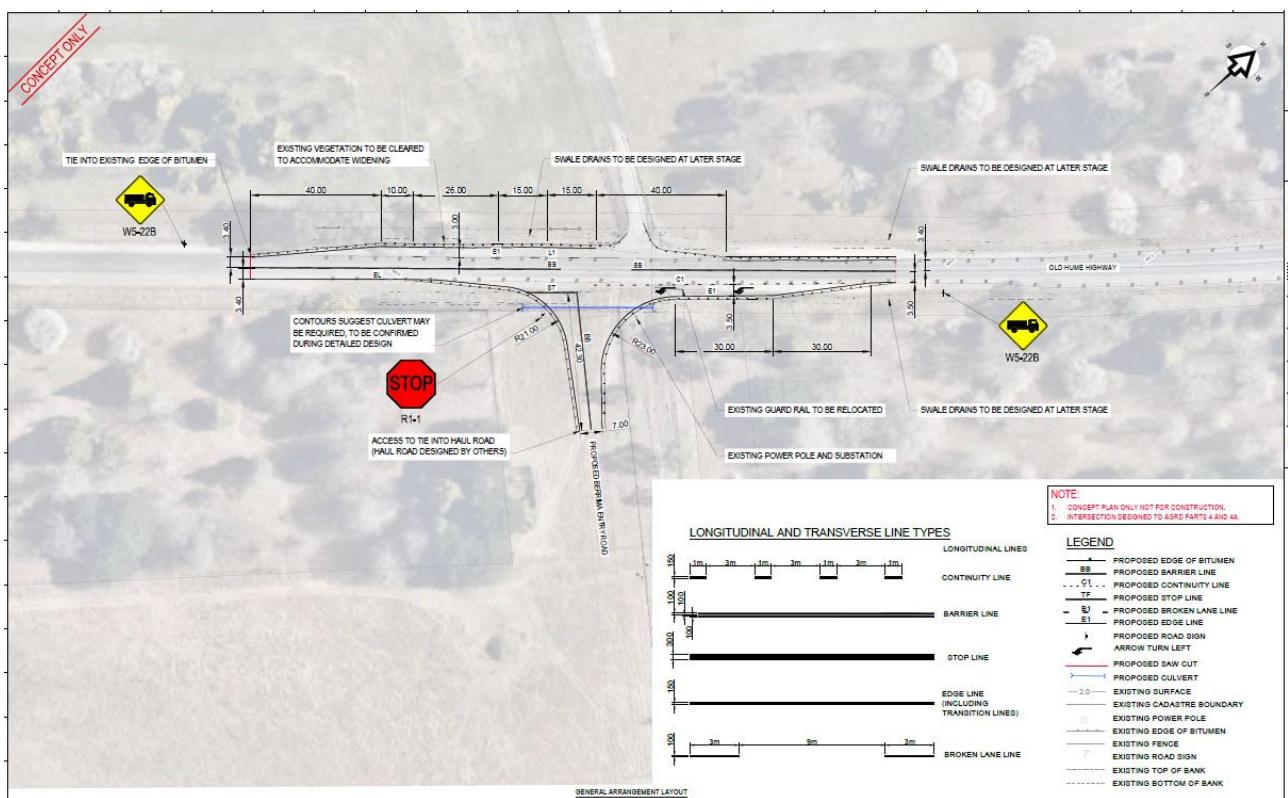
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## Concept Design



## Proposed Conceptual Intersection Design



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## Description, analysis & identification of upgrades

TfNSW has reviewed the information provided and requires the following matters to be addressed.

1. TfNSW note that the SEARs requirements included the necessity for an assessment of all classified roads, which includes the Hume Motorway. The TIA lacks the identification of the heavy vehicle access routes in this location (i.e. are all vehicles travelling to the west to the Hume Freeway to distribute north and south and what will be the impact if any; or will other classified roads and local roads be impacted by the proposal). The TIA does not provide sources of Solid Waste Derived Fuels (SWDF) materials which also makes the directional distributions difficult to quantify. TfNSW therefore require further clarification as to the above, and identification of impacts upon the surrounding state classified road networks.
2. TfNSW understands from review of the TIA that thirteen (13) additional trucks are proposed to be provided for within the operation, to satisfy the additional 150% capacity increase of the use of SWDF product used as part of the operation (i.e. increase of 100,000 tonnes per annum to 250,000 tonnes per annum). TfNSW further understands that the use of coal as a fuel source will remain to be a part of the operations fuel source to the same quantity when the SWDF fuel source is unavailable. The purpose of the proposed modification is therefore to permit a doubling of the capacity to use SWDF fuel (an increase of 16 truck-loads to 39 truck-loads) and a reduction in coal use (22 truck-loads to 12 truck-loads).

Clarification is sought by TfNSW as to the descriptions within the TIA for total trucks currently utilised in the operation versus additional trucks proposed to be included.

The TIA currently mentions on page 11 that 317 truck movements per day are required to be increased to 330 truck movements per day in order to deliver all of the approved fuel sources. The TIA further states that for every reduction in 10 truck-loads of coal at (30 tonnes per truck) a further 23 truck-loads of SWDF fuel source is required.

It is not understood how the additional requirement of 13 trucks as indicated as required within Table 6 of the TIA (understood to be proposed trucks minus existing trucks), would only equate to an additional 13 truck movements per day.

TfNSW would require that the total truck movements per day be further clarified in order that it can be understood how many vehicle movements will be generated, which will then may amend Table 7 of the TIA, providing a clearer understanding of how many vehicles and movements will impact the proposed new haul road intersection with the Old Hume Highway; and, how many vehicles and movements will impact the currently utilised Taylor Avenue access point.

3. TfNSW note that the current TIA does not include a 10 year planning growth horizon to 2032. This growth projection is required to be included within the TIA, and will impact the existing and projected traffic volumes as currently identified within the TIA. TfNSW advise that this is a standard requirement in accordance with the Austroads Guidelines.
4. TfNSW note the TIA states on page 4, that the cumulative impacts of surrounding development is considered within section 6 of the TIA. TfNSW review of the TIA has identified that the assessment of the cumulative impacts of surrounding developments has not been provided (or is not clearly presented in the TIA). TfNSW advise that this was identified as part of the prior SEARs requirements and is standard practice when assessing a modification to a development or new development proposal. TfNSW would require that this assessment be undertaken and findings presented within the amended TIA.



The following matters are raised for the advice of the consent authority:

1. TIA represents a BAR and AUL(s) solution as part of the proposed intersection treatment of the new haul road with the Old Hume Highway. The following points are raised for advice:
  - TfNSW has undertaken a brief review of the design of the AUL(s) which has currently identified that there are deficiencies in the design (for example, the length of the deceleration lane and taper length of the AUL(s), and the width of the BAR treatments do not correlate to the requirements of Austroads Guideline - Part 4a).
  - TfNSW also advise that the current deficiencies in the TIA as raised in points 2 to 4 of this letter above may impact the warrants for treatments that are required for this intersection. That is, treatments based upon the 80km/hr speed environment and warrants diagram provided in Austroads Part 6, may require a higher order treatment than currently represented in the TIA.
2. Clarification may be required as to whether a Code of Conduct for truck drivers will be provided at the DA stage. TfNSW note that any Code of Conduct or management plan will need to identify in which instances the proposed haul road will be utilised versus when the Taylor Avenue access will be utilised by drivers, to ensure an accurate reflection of what is proposed as part of the TIA occurs, and impacts on residents are minimised as proposed.
3. TfNSW understand the consent authority may require a Construction Traffic Management Plan (CTMP) as part of any approval. TfNSW advise that this TIA may be required to provide an understanding of the how the content of the CTMP will manage construction activity occurring on the haul access road, while minimising impacts upon the existing traffic movements on the Old Hume Highway (in particular the potential for queuing of traffic travelling south bound to the Hume Freeway, and any likelihood of impacts to the Medway Road / Taylor Street / Old Hume Highway roundabout due to delays from the construction activities).