

File No: NTH18/00099/04 Your Ref: SSD 9438

Industry Assessments Department of Planning Industry and Environment GPO Box 39 SYDNEY NSW 2001

Attention: Tatsiana Bandaruk Tatsiana.Bandaruk@planning.nsw.gov.au

Dear Sir/Madam,

Re: SSD 9438 – Bonshaw Solar Farm. Lot 2 DP 1039185, Bruxner Highway Bonshaw.

I refer to your proposal received on 30 October 2019 requesting comment from Roads and Maritime Services in relation to the abovementioned development application.

Roles and Responsibilities

The key interests for Roads and Maritime 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.*

Bruxner Highway is a classified (Regional) road (462). Inverell 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* (Roads Act). Roads and Maritime is the roads authority for freeways and can exercise roads authority functions for classified roads in accordance with the Roads Act.

Council is responsible for setting standards, determining priorities and carrying out works on Local and Regional roads. However Roads and Maritime's concurrence is required prior to Council's approval of works on classified (Regional) roads under Section 138 of the *Roads Act 1993*.

In accordance with Clause 101 of the *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) 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. Roads and Maritime is given the opportunity under Clause 104 to comment on traffic generating developments listed under Schedule 3.

Roads and Maritime Response

Roads and Maritime has reviewed the referred information and provides the following comments to assist the consent authority in making a determination;

- The Environmental Impact Statement (EIS) and Traffic Impact Assessment (TIA) have not assessed the impacts on all of the transport routes and key intersections, especially the proposed return route through Ashford, Inverell and Glen Innes.
- It was identified in the TIA that sight distance to the north along the New England Highway at the intersection of the Bruxner Highway is constrained for exiting right-turning traffic. It is unclear from the information provided whether all traffic such as workers and tradesmen exiting the site will have to use the same route as heavy vehicles via Inverell to return to the east.
- To reduce conflict points, access from the Bruxner Highway to the sub-station and solar farm should be consolidated to a single access. It is unclear why the existing sealed access to the sub-station is not being used.

- Any new access will require a Section 138 Application to be submitted to Inverell Council in accordance with the Roads Act 1993. This will require concurrence from Roads and Maritime and should include a strategic concept design for the road works.
- There was no evidence that the proposed access was assessed in accordance with Austroads Guide to Traffic Management Part 6 and Austroads Guide to Road Design Part 4A to identify the appropriate treatments for turning traffic. The minimum requirements for a non-residential rural access is a BAR and BAL. Any proposed road works should consider the long term safety of the access.
- It is noted that a Construction Traffic Management Plan (CTMP), Dilapidation and Decommissioning Plans will be prepared. These should be included in the EIS.
- No swept paths for the largest vehicle that would use the transport routes and proposed access were provided.
- Sight distance measurements at key intersections along the transport routes were only estimated and not measured.
- No crash data was provided for the transport routes.
- No details of the onsite arrangements for parking and servicing were provided.
- It was identified that glare from the solar farm would have an impact on the Bruxner Highway traffic. It was not indicated how long it would take for the vegetative screening to become effective or how the ongoing management of the plantings would be undertaken. This should be addressed.

The proposed Code of Conduct for haulage operators, should include, but not limited to;

- o A map of the primary haulage routes highlighting critical locations.
- Safety initiatives for haulage through residential areas and/or school zones.
- An induction process for vehicle operators & regular toolbox meetings.
- A complaint resolution and disciplinary procedure.
- Any community consultation measures for peak haulage periods.

Where road safety concerns are identified at a specific location along the identified haulage route/s, Roads and Maritime suggests that the TIA be supported by a targeted Road Safety Audit undertaken by suitably qualified persons.

Any future roadwork on the classified (State) road will need to be designed and constructed in accordance with the current Austroads Guidelines, Australian Standards and <u>Roads and Maritime Supplements</u>.

The developer will be required to enter into a Works Authorisation Deed (WAD) with Roads and Maritime 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 accessed using the following link: http://www.rms.nsw.gov.au/projects/planning-principles/index.html

Advice to the Consent Authority

The outstanding issues identified above need to be addressed when proposing an EIS and TIA. If you have any further enquiries regarding the above comments please do not hesitate to contact Greg Sciffer, Development Assessment Officer on (02) 6640 1362 or via email at: <u>development.northern@rms.nsw.gov.au</u>

Yours faithfully,

G. Salt

For Matt Adams Manager Land Use Assessment 25 November 2019