

22 November 2021

File No: NTH21/00163/05
Your Ref: SSD-30956841

The Director
Major Projects Section
Planning Industry & Environment

Attention: Rose-Anne Hawkeswood – rose-anne.hawkeswood@planning.nsw.gov.au

Dear Sir / Madam,

**RE: Secretary's Environmental Assessment Requirements for SSD-30956841 - Proposed Rehabilitation of Ilmenite Stockpiles
Lot 2281 DP 1153793 - Point Plomer Road, Crescent Head**

I refer to your email of 9 November 2021 requesting input from Transport for NSW to the Secretary's Environmental Assessment Requirements (SEARs) for the abovementioned development proposal.

Roles and Responsibilities

Our key interests are the safety and efficiency of the transport network, the needs of our customers and the integration of land use and transport in accordance with *Future Transport Strategy 2056*.

Macleay Valley Way is a classified (Regional) road, Crescent Head Road is an unclassified (Regional) road and Point Plomer Road is a Local road. Kempsey 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. TfNSW is the roads authority for freeways and can exercise roads authority functions for any public road in accordance with the Roads Act.

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

In accordance with Clause 16 of the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007*, TfNSW is given the opportunity to review and provide comment on the subject development application.

Transport for NSW Response

TfNSW have reviewed the information provided and makes the following comments to assist in setting the terms of reference for the EIS related to this development.

- TfNSW notes, previous advice for inclusions into the Secretary's Environmental Assessment Requirements (SEARs) for EAR-1180 were provided for the proposed development by TfNSW on 7 November 2017.

- An assessment was then undertaken for the proposed development, DA T6-20-207A on receipt of a request for comment from Kempsey Shire Council, the Consent Authority. TfNSW advice was provided on 31 March 2021.
- TfNSW understands the scope or works for the development may have changed since the previous comment/s were provided to the Consent Authority and that the development is now defined as a State Significant Development.
- It is understood that the current proposal involves the rehabilitation of the site, including the haulage of approximately 100,000t of material from the project site, just south of Crescent Head to either the Port of Brisbane or the Port of Newcastle, by heavy vehicles.

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**.

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 Katrina Wade, Development Services Case Officer or the undersigned on (02) 6640 1362 or via email at: development.north@transport.nsw.gov.au

Yours faithfully,



for Liz Smith
Manager 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 22 November 2021. TfNSW Reference: NTH17/00163/05.

Traffic Impact Assessment (TIA) be prepared by suitably qualified person/s in accordance with the *Austrroads 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 surrounding road network identifying the Project's site access, nearby road and property accesses, intersections and transport related facilities.
- A detailed map of all proposed transport route/s between the project site to the nominated Port/s, including all public roads proposed to obtain access from the classified (State) road/s to the development site.
- Consideration for Clause 16(1) of the Mining SEPP regarding;
 - The impact on school zones and residential areas.
 - Road safety assessment of the proposed haulage route/s
- 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 proposed trips to be generated by any 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.
- 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 intersections along the proposed transport routes and any constraint to achieving the required sight distance for the posted speed limit. Any information relating to technical standards such as Safe Intersection Sight Distances (SISD), provisions for turning traffic at intersections and accesses should be quantified with actual measurements to demonstrate they comply with current standards and guidelines.

- 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.
- 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.
- Site plan demonstrating site access, internal manoeuvring, servicing and parking areas consistent with the relevant parts of AS2890 and Council requirements.
- 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.
- 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 proposed signage to manage the impacts of the Heavy Vehicles on the road network.
- Details of any Traffic Management Plan (TMP) proposed to address any construction, operation and decommission phases of the proposed development. The TMP may include temporary measures such 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.
 - Work, health and safety requirements under the *Work Health and Safety Regulation 2017*.

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

For any roadworks deemed necessary on the classified (State) road, the developer may be required to enter into a Works Authorisation Deed (WAD) or other suitable agreement as required by TfNSW. 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](#).