

File No: NTH09/01625/30
Your Ref: SSD8169 MP09_0028 MOD 3

The Director
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Pamela Morales

Dear Sir / Madam,

**HW10 Pacific Highway, Yelgun - SSD_8169 and Modification request MP 09_0028 MOD 3 (Concept Plan)
North Byron Parklands Cultural Events Site, Yelgun - comments on Response to Submissions**

I refer to your email of 27 July 2018 requesting comment from Roads and Maritime Services in relation to the abovementioned State Significant Development.

Roads and Maritime has reviewed the responses and submissions made by the other Roads Authorities; Tweed Shire Council and Byron Shire Council. Comments provided by both councils are in general alignment with those provided by Roads and Maritime. For major events the continuation of the established working group consisting of representatives from Roads and Maritime and councils is encouraged.

Roads and Maritime can confirm the following statements of fact relevant to our areas of expertise and regulatory powers;

- The key interests for Roads and Maritime are the safety and efficiency of the road network, traffic management, the integrity of infrastructure and the integration of land use and transport.
- The Pacific Highway (M1) is a classified road (a freeway). Roads and Maritime is the Roads Authority for freeways in accordance with Section 7 of the *Roads Act 1993* (Roads Act). Any proposed works on a freeway will require the consent of Roads and Maritime. Consent is provided under the terms of a Works Authorisation Deed (WAD).
- The Tweed Valley Way (MR679) is a classified (Regional) road. Byron Shire Council is the Roads Authority for this road and all other public roads (other than freeways or Crown roads) in the local government area pursuant to Section 7 of the Roads Act.
- In accordance with *RTA Guide to Traffic and Transport Management for Special Events* the development will have the capacity to host Class 1 Special Events that impact on major traffic and transport systems and have significant impact for the non-event community.

Roads and Maritime consider that in our technical assessment of the 'Response to Submissions' and the 'Additional Traffic Analysis for Response to Submissions', have addressed Roads and Maritime responses for the 'baseline' impact assessment and is now considered a reasonable prediction of impact, which are robust and conservative.

Roads and Maritime considers that in our technical assessment of the EIS Submission to Roads and Maritime responses, specifically for the increase in patrons to 50,000 does not include all reasonably feasible mitigation options.

The impact assessment is not considered acceptable within the policy context of Roads and Maritime, for the following reasons;

- Sensitivity assessment for major events confirms Road and Maritimes safety concerns for the Yelgun interchange roundabout. Reducing the bus mode share by 5% results in an undesirable performance and safety outcome at the Yelgun interchange roundabout. Refer: Additional Traffic Analysis for Response to Submissions. Section 5 Comparison of trip generation of additional scenarios.
- The number of buses required to transport 30,000 additional patrons for a 50,000 event increases from 479 to 1045. This is a significant increase which will impact resources in the local area and beyond. To effectively assess the impacts and the delivery of the proposed mode share assumption further trials are required. Roads and Maritime suggests that the major events could have 5,000 incremental increases in patrons each year subject to a satisfactory performance.

Roads and Maritime has identified that efficient planning and delivery of temporary traffic management will need to continue for all events. This shall include monitoring the performance of each event and capturing information and data to facilitate the ongoing assessment and approval process.

- A Traffic Management Plan (TMP) covering the various events configurations needs to be prepared in accordance with the objectives outlined in Section 1.3 of the *RTA Guide to Traffic and Transport Management for Special Events* to address varying scales of events to be held at the proposed venue. The TMP is to provide the following;
 - Pedestrian Management - measures to manage pedestrian movement internal and external to the site including the surrounding road network.
 - Parking Management - measures to accommodate event parking demand within the site and protocols to manage impacts on the surrounding road network. This should include measures to address parking and/or camping by event patrons on surrounding roads and within the Pacific Highway Yelgun Rest Area.
 - Traffic Control Plans (TCPs) - prepared and approved by accredited persons to be implemented by appropriately qualified personnel to manage pedestrian and vehicular traffic on all access routes to and from the proposed development.
 - Seasonal traffic and broader network performance considerations – measures to mitigate impacts related to the interaction of event traffic with seasonal increases in traffic flows on Pacific Highway and Tweed Valley Way and impacts on the non-event community. For example the Falls Festival event increases traffic flows entering the road network at a time when the road network is experiencing traffic flows of up to 30% above average conditions.
 - Emergency Management Plan (EMP) and Crowd Management Plan (CMP) – integration and consideration of measures proposed in separate EMP

If you have any further enquiries regarding the above comments please do not hesitate to contact John Perkins, Development Assessment Officer on [REDACTED] or via email at: development.northern@rms.nsw.gov.au

Yours faithfully



for Liz Smith
Manager Land Use Assessment, Northern Region

Date: 14 August 2018