



19 June 2020

File No: NTH18/00099/08

Your Ref: SSD-9438

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

Attention: Javier Canon – Senior Policy Officer

Dear Sir / Madam,

**RE: State Significant Development (SSD-9438) Bonshaw Solar Farm - Further Information  
Lot 2 DP 11039185 Bruxner Highway, Bonshaw**

I refer to your email of 15 June 2020 requesting comment from Transport for NSW (TfNSW) in relation to additional information in support of the abovementioned development application.

**Transport for NSW Response**

TfNSW understands that the applicant was requested to further address transport-related impacts of the proposed development and further information has been submitted in support of the development application. TfNSW has reviewed the referred information and provides the following comments to assist the Consent Authority in making a determination;

1. The TIA proposes that the intersection of the site access road and the Bruxner Highway will be upgraded to provide an Austroads shortened auxiliary left-turn (AUL-S) treatment and an auxiliary right-turn (AUR) treatment. TfNSW notes the use of AUR treatments is not permitted in NSW and that the appropriate treatment will be either the minimum Austroads basic right-turn (BAR) treatment or where hourly turn demands warrant greater protection for turning vehicles, a channelised right-turn (CHR) treatment is preferred.

TfNSW recommends that the Consent Authority include a requirement for the intersection upgrade as a condition of consent. The strategic drawing included in the updated TIA is considered indicative only and detailed design acceptance and construction approval will be subject to an application to the relevant Road Authority, which will seek the concurrence of TfNSW for the works on the classified road.

2. The updated TIA does not provide swept path analysis to demonstrate design vehicles negotiating key intersections along the proposed transport routes and identifies availability of aerial imagery as justification for not undertaking analysis.

TfNSW notes that site investigations could have identified existing intersection geometry and confirmed whether minimum Austroads treatments are available.

Whilst many roads in rural areas are gazetted for heavy vehicle use, it must be recognised that existing road geometry may not meet contemporary design standards and peak construction impacts may generate safety concerns. In particular, it is noted that development-related traffic is proposed to interact with background traffic at the intersection of the Bruxner Highway and Sunnyside Platform Road. The existing intersection formation appears to have constrained geometry and may not accommodate the swept path of relevant design vehicles.

TfNSW recommends that the Consent Authority be satisfied that key intersections meet the minimum Austroads turn treatments, being the basic left-turn (BAL) and basic right-turn (BAR) treatments. Where such treatments are not present, then consideration should be given to requiring intersection upgrades and/or the implementation of temporary traffic control measures to mitigate the risk of vehicular conflict.

3. The TIA proposes that the peak construction traffic demand will be 130 light vehicle and 40 heavy vehicle movements per day. It is noted that heavy vehicle movements will be staggered and not occur concurrently. Traffic movements during the operational phase of the development are identified as being 20 vehicles per day with potential for periodic deliveries by heavy vehicles.

TfNSW recommends the maximum daily and hourly vehicle movements for the operational phase be identified in the conditions of development consent.

4. The TIA proposes the adoption of a Construction Traffic Management Plan to manage peak traffic impacts during the construction phase of the development. TfNSW highlights that the suggested safety initiatives and driver code of conduct included in the appendices of the TIA are also of relevance to transport-related impacts over the life of the development.

TfNSW recommends that a Traffic Management Plan (TMP) be further expanded to address the construction, operational and decommission phases of the development. It may form part of an operational management plan for the development and should be prepared in consultation with the relevant road authorities and approved by the Consent Authority prior to the commencement of construction-related traffic.

Any Traffic Control Plan/s (TCPs) required under a TMP to manage peak periods or events during the construction and decommission phases of the development are to be certified and implemented by suitably qualified persons in accordance with the current [Traffic Control at Worksites Manual](#).

TCPs will need to take into consideration the existing speed environment, safety of turning and peak hour traffic. A Road Occupancy Licence (ROL) must be obtained from TfNSW prior to the implementation of any traffic control on the classified road. Further details can be obtained from TfNSW [OPLINC](#) website.

Any TMP could include, but not necessarily be limited to, the following;

- Details of the approved transport route/s, including a map of critical locations.
- Details of the site access location and any related road safety considerations.
- Details of safety initiatives at critical locations along the approved transport route/s.

- Details of how turn movement will be achieved at key intersections.
- Details of how compliance with transport routes will be achieved.
- Details of TCP measures for heavy vehicle deliveries and/or for peak traffic impacts over the life of the development.
- Weekly vehicle movement schedules for construction, operational maintenance and decommission phases.
- An induction process for contractors, employees and visitors.
- Details of regular toolbox meetings to keep relevant persons informed.
- Any community consultation measures proposed for peak periods.
- A complaint resolution and disciplinary procedure.

The Consent Authority may wish to consider requiring a review and monitoring procedure to audit performance and ensure the document remains relevant and responsive over the life of the development.

5. All internal access roads, vehicular manoeuvring, parking and servicing areas should be designed and constructed in accordance with the relevant sections of AS2890 to manage the safe interaction of people and vehicles.

### **Advice to the Consent Authority**

TfNSW would appreciate the opportunity to comment on any draft conditions of project approval.

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 the undersigned on (02) 6640 1362 or via email at: [development.northern@rms.nsw.gov.au](mailto:development.northern@rms.nsw.gov.au)

Yours faithfully,



Matt Adams  
Manager Land Use Assessment  
Regional Customer Service Northern  
Regional and Outer Metropolitan  
Transport for NSW