

16 November 2015

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SF2013/178016  
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The Manager  
Department of Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Attention: Sally Munk

**SSD13\_6281 – PROPOSED INDUSTRIAL DEVELOPMENT – ETHANOL REFINERY, LOTS 234, 272 & 273 DP756325, OLD BARHAM ROAD, DENILIQUN.**

I refer to your correspondence regarding the subject Application which was referred to the Roads and Maritime Services for assessment and comment.

From the information provided it is understood that the proposal represents the establishment and operation of an Ethanol Refinery and associated infrastructure on the subject site. The application is supported by an Environmental Impact Statement (EIS) prepared by AECOM dated 2 Oct 2015 and a Traffic and Transport Technical Report also prepared by AECOM and dated 2 Oct 2015.

The subject site is located to the south of Deniliquin with frontage to the Deniliquin – Barham Road (RR7605), also referred to as Barham Road, within a 100 km/h speed limit. Access to the development site is proposed from Barham Road and Line Road. It is understood from the submitted documentation that the development will rely on the transportation of goods along various roads that access Deniliquin including the Cobb and Riverina Highways. Roads and Maritime is interested in the characteristics of the traffic generated by the development and in the impact of the development on the safety and efficiency of the road network.

The proposed Ethanol Plant is to have an intended production capacity of approximately 115 ML of Ethanol per year plus other saleable by-products which will require the processing of approximately 300,000 tonnes of grain per annum plus other inputs. The conclusions of the submitted reports rely on the transportation of 70 percent of the raw material inputs and output products from the Ethanol Plant by the rail network to address the impacts of the development on the road network. This places the bulk of road transport on a small portion of Barham Road. However the same reports indicate that one of the objectives of the development is to utilise local grain supplies sourced from the surrounding region which would generate heavy vehicle traffic over a broader road network than Barham Road.

The Traffic and Transport Technical Report indicates that the transportation of inputs to and outputs from the ethanol plant is to be by heavy vehicles up to B-Double configuration. The proposed transportation of goods is along both local and classified roads. The Cobb Highway, Riverina Highway and Barham Road are currently approved road train (type 1) routes.

Barham Road (RR7605) is an Unclassified Regional Road under the provisions of the Roads Act, 1993. This road is maintained by the Deniliquin Council. The transportation route along Barham Road between the development site and intersection of Barham Road with the Cobb Highway is approximately 4 kilometres and between the site and the Rice Growers rail siding is approximately 3 kilometres. The intersection of Barham Road with the Cobb Highway is constructed as a roundabout intersection treatment. The submitted reports acknowledge the need for road works, including intersection upgrades, but defers refining the standard of such works to the detailed design phase. It is noted that at this stage further discussion is proposed to be held with the relevant road authorities.

The Traffic and Transport Technical Report addresses traffic generation for the construction and operational phase of the project. Both phases of the development will generate both light and heavy vehicles movements. During the construction phase the report claims that the project will generate 28 heavy vehicles trips (56 movements) per day however this is likely to vary significantly depending on the stage of construction and delivery of materials. During the operational phase the report indicates that the proposal will generate 65 heavy vehicles trips (130 movements) per day 330 days per year.

The Traffic and Transport Technical Report relies on the use of the Rice Growers rail siding to minimise the additional traffic generation and potential impacts on the road network resulting from the operational phase of the Ethanol Plant. Should the rail siding not be available or used for the operational phase of the development as proposed further assessment would be required to be undertaken of the alternative haulage routes on the road network for the transportation of goods to and from the development.

The additional heavy vehicle movements generated by this proposal represents a significant increase above the existing traffic volumes, particularly on the Barham Road. Given the proposed constant and continual haulage of material along the haulage route it may be appropriate that a road maintenance plan, and even a road dilapidation report, be developed and agreed upon between the applicant and the Deniliquin Council prior to any consent being issued for the construction and operation of the ethanol plant.

The proposal includes the construction of 2 driveways to Barham Road, one driveway for 2 way access for light vehicles and the second driveway for heavy vehicles from Barham Road. A driveway is proposed to Line Road to provide for one way movement through the development site for heavy vehicles with ingress from Barham Road and egress to Line Road. The separation of light and heavy vehicle access to the site and the one-way flow for heavy vehicles is supported for road safety reasons. However as heavy vehicles are to exit the site via Line Road, with appropriate design of the driveway and internal configuration of the roadways, the driveways to Barham Road could be combined and light and heavy vehicles separated once within the development site.

The Traffic and Transport Technical Report defers the design of access driveways and the potential refinement of the site layout and internal road network to the detailed design phase. As a minimum any driveway or intersection to Barham Road is to be designed and constructed in accordance with the intersection warrants and design requirements as per the Austroads Guides to Road Design for the prevailing speed limit for a road train (type 1) route. This report refers to the construction of an Auxiliary Left Turn (AUL) treatment to accommodate access for heavy vehicles from Barham Road to the site. Any access driveway should be sealed at least to the property boundary for road safety reasons. As the Barham Road is an approved road-train route the intersection treatment is to be designed for access for road train vehicles.

The submitted documentation also addresses issues relating to the construction phase of the development and the haulage of components of the on-site processing plant and ancillary facilities. The detail provided does not allow for the full consideration of the construction phase of the development. On this basis it is considered appropriate that a construction traffic management plan be developed to the satisfaction of Roads and Maritime Services and the Deniliquin Council. This plan shall address any oversized vehicle movements required.

Roads and Maritime Services advises that it does not object in principle to the establishment of the ethanol Plant on the subject site however emphasises the need to minimise the impacts of the development on the existing public road network and maintain the level of safety, efficiency and maintenance along the network. The following considerations are provided for road safety reasons.

Roads and Maritime Services has assessed the Application on the information provided and notes the Traffic and Transport Mitigation Measures outlined in table 12.4 of the submitted Environmental Impact Statement and would raise no objection to the proposal subject to, in addition to table 12.4, the Consent Authority giving consideration to the following items;

1. As a minimum any driveway or intersection with the Deniliquin - Barham Road (RR7605) shall be designed and constructed to provide a sealed intersection treatment in accordance with the intersection warrants and design requirements of the Austroads Guide to Road Design for the prevailing speed limit. The design for any proposed driveway to intersection works is to be approved by the relevant road authority prior to the Construction Certificate for construction of the Ethanol Plant.
2. As a minimum any driveway or intersection with the Deniliquin - Barham Road (RR7605) shall be located, constructed and maintained to provide the required Safe Intersection Sight Distance (SISD) in either direction along the carriageway of the road in accordance with the Austroads Publications for the prevailing speed limit. Compliance with this requirement for each intersection and driveway is to be certified by an appropriately qualified person.
3. The operator shall implement a Construction Traffic Management Plan, prepared in consultation with the relevant road authorities, to outline measures to manage traffic associated with the construction and establishment of the ethanol plant. This plan shall focus on the management of light and heavy vehicle traffic generated by the construction activity of the development, the potential impacts, the measures to be implemented, and the procedures to monitor and ensure compliance and obtain the approvals required. Any Traffic Management Plan for the movement of oversize plant to the site is required to involve the appointed transport contractor.
4. The operator shall keep accurate records of the volume of inputs and processed goods transported via rail and on public roads and the associated traffic movement numbers on a monthly basis. These records shall be made available at the request of either the Deniliquin Council or Roads and Maritime Services.
5. The operator shall implement a Transport Management Plan, prepared in consultation with the Deniliquin Council and Roads and Maritime Services, to outline measures to manage traffic related issues associated with the operation of the ethanol plant. This plan shall focus on the management of light and heavy vehicle traffic generated by the development, the potential impacts, the measures to be implemented, and the procedures to monitor and ensure compliance. It shall include a Transport Protocol for heavy vehicle drivers in the transportation of goods and measures to ensure compliance with and enforcement of the protocol.
6. Works associated with the development shall be at no cost to Roads and Maritime Services.

Any enquiries regarding this correspondence may be referred to the Manager, Land Use for Roads and Maritime Services (South West Region), Maurice Morgan, phone (02) 69371611. Please forward a copy of the Notice of Determination for this application to Roads and Maritime Services.

Yours faithfully



Per:  
Mr Lindsay Tanner  
Regional Manager  
South West Region