



8 March 2021

SF2016/057834; WST16/00066/10

The Manager
Resource and Energy Assessments
Department of Planning, Industry and Environment
PO Box 39
Sydney NSW 2001

By email: Robert Hodgkins, Planner

Dear Mr Hodgkins,

**SSD-10417: Lot 222 DP 1247780 and others; 22L Sheraton Rd, Dubbo
Proposed Dubbo Quarry Continuation Project (Holcim)**

Thank you for referring SSD-10417 via the NSW Planning Portal on 9 February 2021, inviting comment from Transport for NSW (TfNSW) pursuant to Section 16 of the *SEPP (Mining, Petroleum Production and Extractive Industries) 2007*.

TfNSW has reviewed the submission and Traffic Impact Assessment (TIA) in the context of historic consents applicable to the site and surrounds. Unfortunately, TfNSW is not able to provide final comment to the proposal at this time. As such, further information and commitments are requested to address the following:

- The Road Safety Audit (RSA) provided by the applicant raises safety concerns with mixing of quarry and school traffic or pedestrians at peak times. If different road users are separated the potential for incidents will be substantially reduced. The applicant has not proposed management measures and/or works to address these risks or justified why such commitments are unnecessary to keep the risks as low as reasonably practicable. Any measures may be included as consent conditions or incorporated into a Traffic Management Plan in consultation with schools, bus operators, businesses, Council and TfNSW.
 - *Please note Skillset Senior College (171 Sheraton Road) has non-standard start and finish times for classes, and these are to be considered by the applicant. The school zone operating hours have recently been amended to 8:00-9:30am and 2:00-4:00pm.*
- The TIA asserts there will be no significant increase in quarry traffic as the existing consent conditions (SPR 79/22) do not limit haulage. The TIA cites historic production up to 500ktpa with average 350ktpa (s3.1, pg17) but later refers to historic production up to 350ktpa (s3.3.2, pg19) and notes the Environmental Protection Licence (EPL) is approved for up to 500ktpa. These quantities cannot be accepted as the baseline traffic scenario, as:
 - For the present-day baseline, neither the production capacity of plant onsite, nor the production levels the site has operated at in recent years, can be taken as evidence of compliance with historic DA consent SPR79/22. The applicant should present a summary of comprehensive review of the planning reports accompanying SPR79/22 to determine haulage traffic volumes that were consented to.
 - Without approval of this application, existing hard rock resources at the site are likely to be depleted within a few years as the existing consent is limited in terms of the quarry envelope. The baseline + 10 years scenario (which Austroads AGTM12 specifies is to be assessed for development proposals) is to therefore reflect zero quarry traffic.
- The proposal includes use of trucks up to 20 metres long. The Sheraton Rd route is not approved for trucks greater than 19 metres or 50 tonnes on either the TfNSW Restricted Access Vehicle (RAV) or Performance Based Standards (PBS) maps, available online. If the route is to be reclassified to allow PBS Level 1 trucks (up to 20m), it is requested this be initiated through Council, and gazetted prior to commencement of haulage. The applicant is to clarify how the National Heavy Vehicle Regulation (NHVR) rules will be met.

- Proposed hours of loading and transport are 4am to 6pm Monday to Saturday (Sundays or public holidays for emergencies). The applicant is to clarify controls and commitments to safely manage haulage during darkness and twilight.
- The basic crash analysis in the RSA (s2.9) is not acceptable as it lacks an assessment of crash characteristics and likely root causes. Detailed crash data can be obtained from TfNSW. A more comprehensive analysis is to be presented on behalf of the applicant.
- Traffic counts provided at TIA Figure 2.2 (R.O.A.R., 4th and 6th June 2019) are substantially lower than TfNSW data (4th December 2019) in both the AM and PM (school) peak periods, for most or all movements at the roundabout. Austroads AGTM12 recommends multi-day counts be used, so the analysis is to be based on the likely worst-case using both datasets as they are statistically relevant, or further counts are needed.
- The underlying assumptions used to model increases in traffic from the raw data are to be summarised. It appears the current analysis has not allowed for Skillset College or the approved increase in haulage from South Keswick Quarry, which TfNSW understands is capped at 495ktpa, 110 truckloads outbound per day and 10 loads outbound per hour.
- The neighbouring quarry (DA2016/482) committed to limit maximum hourly traffic to 20 hourly movements (in and out combined), equating to a peak factor of around twice the average number of loads required to achieve approximately 500ktpa. This approach is commonly taken on similar developments. Higher peak traffic volumes are associated with poor safety and efficiency outcomes, especially where they coincide with elevated background traffic. The applicant should consider an appropriate reduced hourly limit or is to justify why the current proposed limit is necessary.
- Discussion in the TIA (s4.5) on extension of Boundary Rd in 2021 is inadequate. Boundary Road will cater for new desire r between the southwest residential area and the highway / east Dubbo, with potential to significantly increase traffic along the haul route. Discussion of appropriate parameters for input into the SIDRA modelling is required, and likely worst-case scenarios are to be modelled for both the opening year and +10 years post-commencement.
- TfNSW does not accept the assumed quarry trip distributions at the roundabout (50% to west, 25% to east and 25% to north). During any hourly period of a haulage campaign, 100% of trips are likely to use any one of the legs of the roundabout. Different trip distributions must be considered to demonstrate likely worst-case performance.
- 95th percentile queue values modelled with SIDRA disagree with site observations, which both the submitted RSA and TfNSW staff have observed routinely approach lengths of 300 metres or more from the Mitchell Highway southwards to the supervised school crossing. Traffic survey is required to verify queue lengths that develop south of the roundabout, in both directions towards and away from the roundabout (noting traffic is also known to queue back toward the roundabout). The report is to explain how the SIDRA model was recalibrated to match surveyed queue lengths before updated modelling is provided.
- It is suggested that a linked SIDRA model, incorporating the school crossing in addition to the highway roundabout, may give results that reflect real-world conditions.

TfNSW requests that the application is not approved until the above requested information is provided, and TfNSW has had an opportunity to review and make a submission. Please email development.western@rms.nsw.gov.au for traffic information, or if you wish to discuss this matter further contact Bevan Crofts, Case Officer on (02) 6861 1449.

Yours faithfully



Andrew McIntyre
A/Manager Development Services
West