

27 May 2021

File No: NTH07/01158/16

Your Ref: SSD-10398

The Director
Energy, Industry and Compliance
Planning and Assessment
Department of Planning, Industry and Environment

Attn: James McDonough – Team Leader

Dear Sir / Madam,

RE: Major Projects – EIS - Hanson Tweed Sand Plant Expansion (SSD-10398)

I refer to the Department's referral via the NSW Major Projects Portal of 30 April 2021 requesting advice from Transport for NSW in response to the Environmental Impact Statement (EIS) for the above mentioned State Significant Development.

TfNSW can confirm the following statements of fact relevant to our areas of expertise and regulatory powers.

- The Pacific Motorway (M1) is a declared Freeway and Tweed Valley Way (MR679) is a declared Controlled Access Road (CAR) along the boundaries of the subject site. TfNSW is the Roads Authority for Freeway and Tweed Shire Council is the Roads Authority for all public roads in the local government areas pursuant to Section 7 of the *Roads Act 1993*.
- Access to the Freeway and/or CAR, including any road works require the consent of TfNSW in accordance with Section 70 of the *Roads Act 1993*.
- The Pacific Motorway and Tweed Valley Way is a 3 legged interchange providing a high speed overpass designed for safe and efficient movement between the Freeway and Tweed Valley Way. This interchange was not designed for access to land uses along the eastern boundary.
- There is currently no public road connection between the Tweed Valley Way overpass and the subject land. Access to the subject land is available to the East via Altona Road and Crescent Street, which are public roads.

TfNSW notes that the Applicant was provided pre-lodgement advice to assist preparation of the EIS. A copy of that advice included in our Agency's response to the SEAR for this SSD.

TfNSW considers that in our technical assessment of the EIS, specifically Annexure J – Traffic Impact Assessment (TIA), that the 'baseline' for impact assessment is reasonable and the predictions of impact are robust with suitable sensitivity testing under Average Annual Daily Traffic (AADT) conditions. However, the development is proposed to directly access an interchange designed to accommodate seasonal peak traffic flows and the assessment does not include a sensitivity analysis of development impacts under 100th Highest Hour Volumes.

A number of the proposed mitigation measures, particularly the Applicant's preferred access arrangement, are not considered acceptable within the policy context of TfNSW. Technical comments are provided in **Appendix A** of this response to assist the Applicant identifying appropriate measures to enable this development to proceed.

Importantly, further detail of an acceptable access arrangement must be submitted prior to determination of the SSDA to provide certainty that TfNSW will consent to legal and physical access via the Pacific Motorway and Tweed Valley Way interchange. Whilst it is acknowledged that the applicant did seek comment from TfNSW in relation to access options, it is noted that no further consultation was undertaken during preparation of the EIS to confirm acceptance of a preferred access arrangement prior to lodgement. TfNSW regrets the delay this advice may present to the SSDA, however the ongoing safety and efficiency of the Pacific Motorway is of critical importance to the region and our customers.

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.

TfNSW is available to meet with the Department and the Applicant to discuss the above response and an appropriate access arrangement for the proposed development. Please contact our office to arrange a meeting. If you have any enquiries regarding the above comments please contact the undersigned on (02) 6640 1362 or via email at: development.northern@transport.nsw.gov.au

Yours faithfully,



Matt Adams
Team Leader, Development Services
Community and Place | Region North
Regional & Outer Metropolitan
Transport for NSW

Enc: Attachment A – Technical Comments

Attachment A - Technical Comments

For context, this attachment must be read with TfNSW response of **27 May 2021** to SSD 10398.

TfNSW has reviewed the Environmental Impact Statement and all relevant annexures and provides the following comment to assist the Department and the Applicant in progressing the application:

Traffic Impact Assessment

1. The TIA identifies four access options that were discussed with TfNSW during a pre-lodgement consultation. The applicant was advised that 'further refinement of the access option and supporting information is required to inform any RMS decision'. The need for access to TfNSW owned land and related licences and consents to access the interchange were also identified.

TfNSW notes that the access options included in the EIS remain unchanged since pre-lodgement and that no further TfNSW comment was requested during preparation of the EIS. Consequently, TfNSW was unable to confirm acceptance of a final strategic option prior to lodgement of the EIS. The level of detail provided in the EIS and supporting technical assessments is insufficient to inform TfNSW acceptance within the assessment timeframes of the SSD process.

The TIA did not include a Road Safety Assessment of the proposed merge and diverge arrangement under the Applicants preferred access arrangement. The TIA makes reference to no Road Safety Audit being required for locations outside of the interchange and overlooks the need to consider the safety of the proposed access design.

TfNSW is not satisfied that the applicant's preferred Option 4 will operate safely and efficiently. It is considered likely that heavy vehicles merging into the off-ramp will find it difficult to regulate speed and will be reliant on through traffic making adjustments to accommodate entering trucks. This presents a safety risk and is contrary to the function of the off-ramp. TfNSW requests that further consideration be given to alternative options for access to the proposed development in consultation with TfNSW.

2. The TIA makes no reference to the relevant guidance for considering the access to a Freeway or interchange. TfNSW highlights Section 17.1.1 of the *Austroads Guide to Road Design Part 4C: Interchanges* (2015), which states that;

No private access should be allowed to the main carriageways or ramps of a Freeway. The only exception is privately owned generators such as service centres. Access control on freeways provides the greatest single benefit to road safety on these high-speed facilities.

This is further reinforced in Section 7.6.4 of the *Austroads Guide to Traffic Management Part 6* (2020), which states that;

A special case may exist where a road network or major service centre requires access and there is no alternative but to intersect the ramp alignment. In such cases, access should only be permitted through a roundabout or signalised intersection that effectively becomes the ramp terminal.

TfNSW notes that the Applicant's investigated Option 3 only considered the benefits of a roundabout located on the existing alignment and it is unclear if investigation was undertaken to consider the benefits of offsetting a roundabout further to the south-east to increase separation from the Freeway ramps and overpass.

Whilst it is acknowledged this would require the acquisition and dedication of land by the Applicant, it would achieve an appropriate interchange form as identified in Section 7.5.3 of the *Austrroads Guide to Traffic Management Part 6*. As per the RMS feedback, a roundabout lowers the speed of all vehicles to accommodate the entry speed of trucks. Further consideration should be given to the benefits of a suitably designed and located roundabout, which may enable TfNSW to support access to the proposed development.

3. The TIA includes analysis of heavy vehicle acceleration for trucks entering the interchange. Our Freight team has observed that larger vehicle combinations have been used by Hanson operations elsewhere.

Given direct access is proposed to an interchange, it is requested that the Applicant confirm the expected vehicle combinations requiring access to the site. Any further analysis required to reflect larger combination vehicles should be provided.

In particular, TfNSW Freight Branch have requested the applicant confirm if a PBS 3 axle truck and 5 axle (Quin Dog) will potentially access the site and the implications this will have for identified acceleration distances. Additionally, the proponent is requested to review the TIA and confirm whether the small survey numbers in Table 6.5 should be the basis of calculating Table 6.7.

It is recommended the Consent Authority consider limiting access to those heavy vehicle combinations demonstrated by the TIA as being suitable to access the site, and to identify a process for the submission of further analysis and assessment to justify access for larger combination vehicles prior to such vehicles accessing the site over the operational life of the development.

4. The TIA does not include a sensitivity analysis of development impacts during seasonal peak periods. The Roads and Maritime Comments provide in our tabled response to the pre-lodgement meeting of 23 September 2019 identified the need to demonstrate development performance under Hundredth Highest Hour Volumes, as the relevant parameter for interchange performance. Prior to any further sensitivity analysis, it is recommended that the Applicant's Traffic Consultant contact TfNSW to seek acceptance of the input parameters, including any growth rate applied to the Pacific Motorway interchange.
5. TfNSW notes the Operational Traffic Management Plan (OTMP) for the previously approved development attached to the TIA and the proposal to update this document to address the proposed development. TfNSW notes that the RMS comment included in the TIA with respect to that OTMP is not directly relevant to the development proposed under the current SSDA.

TfNSW recommends that a new Operational Traffic Management Plan (OTMP), inclusive of a Driver Code of Conduct (CoC) and consistent with the Consent Authorities typical format for SSD, be a requirement of any project approval. The document should be prepared in consultation with the relevant Road Authorities and approved by the Consent Authority prior to the commencement of vehicle movements associated with the major project.

Geotechnical Report

6. The EIS proposes the extraction of material to a depth of 20m below ground level and within 10m of the project site boundaries. Appendix A13 identifies that the phases 8 and 13 of extraction will be in the vicinity of the Pacific Motorway interchange. TfNSW has concerns regarding the proposed depth and proximity of extraction to the Motorway and the resulting implications for future planning and State infrastructure.

TfNSW is seeking internal geotechnical advice and will further advise the Consent Authority of an appropriate setback from the Freeway corridor to ensure the final arrangement is safe, secure and stable. Our interim request is that the Consent Authority impose a hard setback of 40m from the Freeway corridor boundary.

Flooding

7. TfNSW requests that the Consent Authority ensure that the Flood & Stormwater Assessment provide in Appendix D1 of the EIS is consistent with Council's Flood Plain modelling for the subject area. The Consent Authority should be satisfied that appropriate mitigation measures are adopted to ensure the proposed development does not generate an additional flood risk to the Pacific Motorway in this locality.

Dust

8. The Consent Authority should consider the potential for operations within the site to direct dust towards the Pacific Motorway. Consideration should be given to the sealing of internal access roads or other suitable management measures to mitigate the impact of any dust generated by the development.