



21 February 2020

File No: NTH18/00060/02

Your Ref: SSD-9264

The Director
Energy and Resource Assessments
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Natasha Homsey – A/ Senior Environmental Assessment Officer

Dear Sir / Madam,

**RE: State Significant Development SSD-9264 – Tamworth Solar Farm – Exhibition of EIS
Lot 186 DP 755340, 2209 Soldiers Settlement Road, Somerton**

I refer to the above-described State Significant Development application (SSD-9264), referred to Transport for NSW (TfNSW) through the NSW Planning Portal for comment.

Roles and Responsibilities

From 1 December 2019, all functions and responsibilities of Roads and Maritime Services will now be vested in an integrated Transport for NSW (TfNSW). Our key interests are for the safety and efficiency of the transport network, the integrity of State infrastructure and the integration of land use and transport in accordance with *Future Transport Strategy 2056*.

The Oxley Highway is a classified (State) road. Tamworth Regional Council is the Roads Authority for all public roads (other than freeways or Crown roads) in the local government area pursuant to Section 7 of the *Roads Act 1993*. TfNSW is the roads authority for freeways and can exercise roads authority functions for classified roads. Any proposed works on a classified (State) road will require the consent of TfNSW and consent is provided under the terms of a Works Authorisation Deed (WAD).

In accordance with Clause 104 of the *State Environmental Planning Policy Infrastructure 2007* (ISEPP), TfNSW is given the opportunity to review and provide comment on the subject development application as it meets the requirements under Schedule 3.

Transport for NSW Response

TfNSW technical assessment of the EIS, specifically the TIA, considers that the 'baseline' for traffic impact assessment has not been adequately identified and consequently the predictions of development impacts on the road network are not robust or comprehensive. Our letter of 1 May 2018 advised the relevant considerations to inform the EIS and the TIA does not adequately address the relevant aspects of the applicable guidelines.

TfNSW has reviewed the referred information and recommends that the Consent Authority request additional information to further address the following issues prior to making a determination;

- Clearly identify the proposed transport route from the Oxley Highway to the development site and any alternate secondary routes to be used by the development.

- Identify the existing traffic conditions on the affected transport route/s, being informed by recent traffic count data. The count data should be used to inform forecasted traffic conditions for each phase of the proposed development.
- Identify the maximum daily and peak hourly vehicle movements generated by each phase of the development along the proposed transport route/s.
- Identify projected traffic conditions for opening year and over a 10 year horizon to enable consideration of construction and operational impacts along the transport route/s, particularly at key intersections.
- Identify trip distribution including total two-way traffic volumes along the identified transport route/s, directional movements at key intersections and the proportion of heavy vehicles using the route. The mapping demonstrated in Figures 2-1 and 4-1 of the TIA identifies only identify the distribution of development related trips.
- Identify whether the existing intersections along the identified transport route meet the minimum Austroads turn treatments. The forecasted traffic demands should be used to inform an assessment against the turn warrants provided under Austroads Guide to Traffic Management Part 6 and Austroads Guide to Road Design Part 4A. All intersection improvements proposed to accommodate the proposed development should be identified in the EIS.

It is noted the TIA proposes an Austroads auxiliary left-turn (AUL) treatment to accommodate development traffic turning from the Oxley Highway into Babbins Road. Further consideration should be given to the likelihood of any vehicle turning right from the Oxley Highway at this intersection and it is recommended that measures are identified to address the risk arising to any vehicle turning from the travel lane of the highway.

- Identify the required sight distances for the posted speed limit/s at each intersection, any existing constraint to available sight distances and measures to address any identified deficiency.
- It is recommended that the Consent Authority obtain strategic designs demonstrating the scope of all works proposed on public roads and have consideration for any associated environmental impacts.
- Details of proposed site access, parking, manoeuvring and servicing areas, including swept paths for the largest vehicle entering and leave the site in a forward direction.
- Details of the outcome of consultation with the relevant bus service providers and further consideration for the impact of development traffic on existing school bus routes.
- Details of the design vehicles proposed to delivery materials to the site and confirmation they can be safely accommodated on the identified transport route.
- The Consent Authority should be satisfied that the proposed measures to mitigate the impact of road noise and dust have addressed all relevant receivers.
- The Consent Authority should be satisfied that the EIS has addressed the potential impact of reflectance or glare from onsite infrastructure to any public roads over the life of the project.
- TfNSW recommends that the Construction Traffic Management Plan and Driver Code of Conduct provided under Appendices A and B of the TIA be included as a requirement of any project approval. The documents should be further expanded and approved by the Consent Authority prior to the commencement of the construction phase. TfNSW can provide further input to inform these documents once the abovementioned issues have been further addressed.

Prior to any determination, TfNSW would appreciate the opportunity to comment on any additional information submitted in support of the development application.

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 road works 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 development consent.

All works on classified (State) road are to be designed and constructed in accordance with Austroads Guidelines, Australian Standards and TfNSW Supplements.

Any road works deemed necessary by the Consent Authority on a classified (State) road will require the consent of TfNSW and consent is provided under the terms of a Works Authorisation Deed (WAD). The Developer will be required to enter into the WAD with TfNSW and complete all works to satisfaction of TfNSW prior to the commencement of the construction phase of the development. The developer will be responsible for all costs associated with the works and administration for the WAD. It is recommended that developers familiarise themselves with the requirements of the WAD process. Further information can be accessed at: <https://www.rms.nsw.gov.au/documents/projects/factsheet-development-process.pdf>

Upon determination of the application it would be appreciated if Council could forward a copy of the approval for our records. If you have any further enquiries regarding the above comments please contact Katrina Wade, Development Assessment Officer on (02) 6640 1362 or via email at: development.northern@rms.nsw.gov.au

Yours faithfully,



Matt Adams
Manager Land Use Assessment, Northern