

23 July 2021

Department of Planning, Industry & Environment
Industry Assessments
GPO Box 39
SYDNEY NSW 2001

Attention: Deana Burn

TOMAGO ROAD (MR302): SSD 10447, RESOURCE RECOVERY FACILITY, LOTS: 8 & 11 DP: 270328, AND PART LOT: 301 DP: 634536, 21 D&F SCHOOL DRIVE TOMAGO

On 17 June 2021, Transport for NSW (TfNSW) accepted the referral for the Response to Submissions by the Department of Planning, Industry and Environment (DPIE) (through the Planning Portal) regarding the abovementioned application.

It is noted that on 15 December 2020, DPIE referred the original Environmental Impact Statement for the State Significant Development to TfNSW for comment in accordance with Clause 104 / Schedule 3 of the *State Environmental Planning Policy (Infrastructure) 2007*. TfNSW responded on 4 February 2021.

TfNSW understands the proposal to be for resource recovery facility with ancillary truck parking depot. The site is expected to generate an additional 348 heavy vehicle and 126 light vehicle movements per day. The documentation has identified that no road upgrade works are to be undertaken as part of the proposal.

TfNSW Response

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

Tomago Road (MR302) is a classified (State) road and McIntyre Road is a local road. DPIE is the roads authority for both roads and all other public roads in the area, in accordance with Section 7 of the *Roads Act 1993*.

TfNSW has reviewed the Response to Submissions (RtS) by Jackson Environment and Planning dated 8 June 2021, and the submitted Traffic Impact Assessment (TIA) by SECA solution dated 28 April 2021. TfNSW raises concern that the TIA does not adequately address the traffic impact of

the proposed development on the Tomago Road and McIntyre Road intersection, specifically:

- That the traffic volumes collected are not relevant to understanding the existing traffic environment. The traffic counts for the Tomago Road and McIntyre Road intersection were undertaken on 6 July 2021, which was within the NSW school holiday period. It is considered that the surveyed traffic volumes would unlikely represent typical Tomago Road peak hour traffic volumes.
- The TIA describes a 24 hour operation however there is a lack of evidence to demonstrate how the operational traffic peak is different to the Tomago Road traffic peak. All intersections affected by the proposal must be modelled during the network AM and PM peak, as well as the development peak.
- The proposal does not adequately address the capacity of the intersection to accommodate the proposed traffic. The intersection is currently configured as a Basic Right (BAR) and Auxiliary Left (AUL) type intersection. The intersection has been modelled using Sidra, with the right turn demonstrating failure (Level of Service E) within 10 years of site operation. The site is modelled as an Auxiliary Right (AUR) turn, noting that SIDRA may not be able to accurately model a BAR. Irrespective of the limitations of modeling a BAR in SIDRA, the intersection must be assessed using the warrants for turn treatments, as outlined in *Austroads Guide to Traffic Management, Part 6: Intersections Interchanges and Crossings*.
- Noting the conclusions drawn in the TIA that no road work is required, TfNSW maintains the concern raised in correspondence dated 4 February 2021, that queuing from the intersection extending along McIntyre Road from Tomago Road may potentially create queues across School Drive intersection. The effect of this queue suggests that further queues from motorists accessing School Drive along McIntyre Road to Tomago Road will result. The likelihood is further increased when coinciding with peak vehicle volumes in shift changes.

A review of the submitted Sidra files has shown the 2030 queue length to be 41 metres in the PM peak, which will block the access to School Drive. It is recommended further analysis be made in regard to this queuing concern.

Accordingly, TfNSW recommends that DPIE require a revised Traffic Impact Assessment that addresses the above concerns.

Should you require further information please contact Masa Kimura, Development Services Case Officer, on 4908 7688 or 0407 707 999 or by emailing development.hunter@transport.nsw.gov.au

Yours sincerely



Kylie-anne Pont

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