

File No: NTH14/00020/02

Your Ref: DA2019/546

The General Manager
Port Macquarie Hastings Council
PO Box 84
PORT MACQUARIE NSW 2444

Attention: Patrick Galbraith-Robertson

Dear Sir,

**Development Application DA2019/546 – Stage 2B Charles Sturt University
Lot 1 DP1240488, 11 Ellis Parade Port Macquarie**

I refer to your letter dated 6 August 2019 requesting comment from Roads and Maritime Services in relation to the abovementioned development application.

Roles and Responsibilities

The key interests for Roads and Maritime are the safety and efficiency of the road network, traffic management, the integrity of infrastructure and the integration of land use and transport.

Ellis Parade and Major Innes Road are Local Roads. Port Macquarie Hastings Council is the Roads Authority for all public roads (other than freeways and Crown roads) in the local government area pursuant to Section 7 of the Roads Act 1993. Council is responsible for setting standards determining priorities and carrying out works on Local and Regional roads.

Roads and Maritime Services is the Roads Authority for freeways and can exercise road authority functions for classified roads in accordance with the Roads Act. The Oxley Highway is a classified (State) road and consent to any private development works on a State road is provided by Roads and Maritime under the terms of a Works Authorisation Deed (WAD).

In accordance with *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (ESEPP), Roads and Maritime is given the opportunity to review and provide comment on the subject development application as it meets the requirements under Clause 57.

Roads and Maritime Response

Roads and Maritime has reviewed the referred information and provides the following comments to assist in making a determination.

1. The development application is both a Crown Development and a Regionally Significant Development that proposes development of Stage 2B of the Charles Sturt University project. It is noted that the development is well-situated within the Port Macquarie Health and Education Precinct identified in the *North Coast Regional Plan 2036*. It is a significantly large development that has the potential to impact on the surrounding road network, which is both State and local infrastructure.

Roads and Maritime and Port Macquarie Hastings Council are either planning or investigating future upgrades to the road network to service the level of development proposed for the emerging precinct; and to meet the needs of the wider community. Therefore, it is extremely important that sufficient detail is provided in the development application to assist both Roads and Maritime and Council in considering present and future demand for road infrastructure.

2. Roads and Maritime provided comment on Stage 1 of the subject development by letter dated 14 April 2014; wherein a number of traffic and transport concerns were raised (see letter attached as a number of the points remain relevant today). Roads and Maritime does not appear to have been provided the opportunity to comment during assessment of Stage 2A of the development, which placed increased traffic demand onto the local and State road network.

3. Information obtained from Council pertaining to the assessment of Stage 2A identified that the Consent Authority was informed that modelling of cumulative development impacts will result in the Oxley Highway, John Oxley Drive & Wrights Road roundabout performing at a LOS F under future network conditions.

In response to ongoing urban growth in the Port Macquarie area, Roads and Maritime is currently investigating future improvements to the Oxley Highway to address demand for access to Wrights Road and Lake Road intersections during peak periods. At this time suitable upgrades to these intersections with the Oxley Highway have yet to be identified or funded. The approval of successive traffic generating developments in the emerging precinct will expedite the deterioration of intersection performance on the State road and the ability for local traffic to access the wider network during peak periods.

While it is acknowledged that Stage 2B is an extension of the approved Stage 2A and the Determining Authority may move to approved the application; Roads and Maritime recommends that consideration be given to requiring deferral of any further stages of the development until suitable upgrades of the Oxley Highway and John Oxley Drive have been both identified and funded.

4. A review of the Traffic Impact Assessment (TIA) Stage 2B identifies that the application does not include sufficient explanation or justification of the adopted baseline data or underlying parameters and assumptions to enable Roads and Maritime to form an opinion regarding the reliability of the TIA conclusion; which stated; '*all critical intersections have substantially spare capacity, particularly after the upgrades planned by Council*'. In particular, we note the following;
- The TIA Stage 2B relies on previous assessments under Stages 1 and 2A rather than providing a clear methodology and assessment on its own merit. The TIA should provide a clear explanation of baseline data and all underlying parameters adopted to inform the supporting modelling. The relevance of the adopted parameters to the stages of development, and the current and future network conditions should be established without reliance solely on historical reports.
 - It is understood that modelled conditions have been based on updates to the John Oxley Drive Precinct Model. It is unclear if the adopted approach has taken into consideration the most recent land use inputs and network conditions informing recent network investigations, including the Port Macquarie Area Wide Traffic Study, Council's Orbital Road proposal and the Oxley Highway Corridor Model. It is recommended the Consent Authority seek clarification of all input parameters used to inform modelling and justification of their continued relevance.
 - The TIA does not clearly identify trips generated by the existing and proposed stages of development. We note that Council's review of the Stage 2A TIA sought clarification of cumulative trip generation for the staged development and that additional information was tabled to inform that assessment. We recommend that the Consent Authority require further detail of trips that will be generated by all existing, proposed and future stages of development to assist in understanding the cumulative impact of trips generated on the network.
 - The TIA suggests that additional traffic generated by the proposed development will be accommodated by future intersection upgrades being planned by the relevant road authorities. The TIA should clearly demonstrate how additional trips will impact existing intersection conditions prior to future upgrades. The Consent Authority should consider the likelihood of proposed trips exacerbating network conditions prior to delivery of future upgrades and whether the additional trips generated by the development warrant a proportional contribution to future network improvements.

Roads and Maritime requests clarification be sought in respect to the above comments and further information be sought to inform the impacts of the proposed development on the road network prior to making a determination. Roads and Maritime requests the opportunity to review and provide comment on any additional information submitted in support of the application.

Upon determination of the application it would be appreciated if Council could forward a copy of the Notice of Determination for our records. If you have any further enquiries regarding the above comments please do not hesitate to contact the undersigned on (02) 6640 1362 or via email at: development.northern@rms.nsw.gov.au

Yours faithfully



27 August 2019

Matt Adams
Manager Land Use Assessment, Northern

Enc: RMS Correspondence NTH14/00020 - 14 April 2014