



15 June 2018

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The Manager
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ellen Jones

SSD-8392 APPLICATION – PROPOSED DARLINGTON POINT SOLAR FARM, DONALD ROSS DRIVE DARLINGTON POINT.

I refer to correspondence forwarded to Roads and Maritime Services requesting the provision of key issues and assessment requirements to be included in the Secretary's Environmental Assessment Requirements.

Roads and Maritime Services has reviewed the Environmental Impact Statement (EIS) and Traffic Impact Assessment prepared by ARUP for the Darlington Point Solar project. From the information provided it is understood that the proposal is for the establishment and operation of a 275 MW solar photovoltaic (PV) plant and associated infrastructure on the subject site. The subject site has frontage and access to Donald Ross Drive, which is classed as a local road, within a 100 km/h speed zone.

The site does not have frontage to the Sturt Highway or Kidman Way but will rely on access by these roads for workers and delivery of components. Access to the development site is proposed from Donald Ross Drive. It is understood from the submitted documentation that access to the site will be via the intersection of Donald Ross Drive with the Sturt Highway or Ringwood Road with the Kidman Way during both the construction and operational phases of the project. As access to the development site is proposed from Donald Ross Drive any access driveway should be consistent with the requirements of Council.

The submitted documentation fails to identify a specific route for access to the site but instead identifies several options which will require further confirmation. The TIA identifies that access to the site for components for the solar farm is available from Adelaide and Sydney via the Sturt Highway and from Melbourne via the Kidman Way. Therefore the TIA has assumed an equal split for heavy vehicles accessing the site from Sydney, Melbourne or Adelaide representing 33% from each city. It is unusual for the components for the solar farm to be sourced from different locations.

It is understood that the anticipated construction period will be up to 12 months. Due to the characteristics of such a development the significant proportion of traffic generation (for both light and heavy vehicles) occurs during the construction and decommissioning stages of the development with the operational phase of the development generating limited traffic. The submitted documentation considers the heavy and light vehicle traffic generation for construction of the facility. The documentation does not finalise the preferred route for the delivery of components to the development site or the source of other products, such as the aggregate, water and sand. The submitted reports acknowledge that this development will require the

preparation of an appropriate Construction Traffic Management Plan. As the proposal relies on access via the classified and local road network this plan should be finalised in consultation with the relevant road authorities, in this case being both the Roads and Maritime Services and Council.

The submitted documentation indicates that access to the development site is proposed from Donald Ross Drive and through its intersection with the Sturt Highway. The intersection of Donald Ross Drive with the Sturt Highway is currently constructed with a sealed Auxiliary Right Turn (AUR) and Auxiliary Left Turn (AUL) treatment from the Sturt Highway. The intersection of the Kidman way with Ringwood Road is a sealed 4 way intersection with limited turn treatment.

The mode of transport proposed is heavy articulated vehicles up to B-Double in size. Access for B-Double vehicles by either Donald Ross Drive or Ringwood Road is permitted but under restrictions as listed in the B-Double Route approval. Any travel by these roads is to comply with the route restrictions.

The submitted documentation indicates that the construction workforce is proposed to be housed within the local area including Darlington Point, Coleambally, Griffith and surrounding localities. It is proposed that approximately 300 construction personnel would be required on site during the peak construction period. The Traffic Impact Assessment refers to the use of a park and ride system to transport works to and from the site and refers to the use of a parking area within close proximity to the Solar Farm site. Close proximity to the site may be along Donald Ross Drive. As the location of the parking area is not specified the traffic generation to the site is unknown.

The submitted documentation fails to provide sufficient detail to identify the types, volumes and origin/destination of delivery, construction and personnel traffic generated during the construction period. The current intersection of Donald Ross Drive with the Sturt Highway is currently constructed to an appropriate standard to accommodate the anticipated traffic generation. Based on the information provided access to the development site, particularly for heavy vehicles, should be restricted to via the intersection of the Sturt Highway and Donald Ross Drive. As Donald Ross Drive is classed as a local road access to the site from this road shall be to the satisfaction of Council.

Roads and Maritime is mainly concerned with the provision of safe access between the subject site and the public road network and the impact of the development on the safety and efficiency of the road network. Roads and Maritime emphasises the need, particularly during the construction phase of this development, to minimise the impacts on the existing road network. As the subject site is to be accessed via an intersection with the Sturt Highway or the Kidman Way which are located within a 110 km/h speed zone the following conditions are proposed for road safety reasons.

Roads and Maritime Services has assessed the Development Application based on the documentation provided and would raise no objection to the development proposal subject to the Consent Authority ensuring that the development is undertaken in accordance with the information submitted as amended by the inclusion of the following as conditions of consent (if approved):-

1. Prior to the commencement of construction activities a Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Roads and Maritime Services) to outline measures to manage traffic related issues associated with the development, particularly during the construction and decommission processes. The appointed transport contractor shall be involved in the preparation of this plan. The plan shall address all light and heavy traffic generation to the development site and detail the potential impacts associated with the development, the mitigation measures to be implemented, and the procedures to monitor and ensure compliance. This plan shall address, but not necessarily be limited to the following;
 - i) Finalise details of haulage, including transport routes, volumes, vehicle type and length, timing, and frequency,
 - ii) Finalise details of any required road-specific mitigation measures.
 - iii) Require that all vehicular access to the site be via the approved access route.
 - iv) Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic,

- v) Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered.
 - vi) The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times. The management of construction staff access to the works site is to include strategies and measures employed to manage the risks of driver fatigue and driver behaviour.
 - vii) Measures to address adverse climatic conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the facility (e.g. fog, dust, wet weather).
 - viii) procedures for informing the public where any road access will be restricted as a result of the project,
 - ix) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project,
 - x) a Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc and appropriate penalties for infringements of the Code,
 - xi) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site,
2. Vehicular access to the development site, particularly heavy vehicles, shall be restricted to via the intersection of the Sturt Highway and Donald Ross Drive.
 3. The pick up and drop off location(s) for the proposed park and ride as referred to in the Traffic Impact Assessment shall be located at sites to the satisfaction of both the Council and Roads and Maritime Services.
 4. The Proponent must engage an appropriately qualified person to prepare a Road Dilapidation Report for transport routes particularly the intersections of the Sturt Highway with Donald Ross Drive and/or the Kidman Way with Ringwood Road to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority (Roads and Maritime Services and Council). This report is to address all road related infrastructure. Reports must be prepared prior commencement of, and after completion of, construction (and decommissioning). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, must be repaired at the Proponent's cost. The applicant is accountable for this process, rather than the proposed haulage contractor. Such work shall be undertaken at a time as agreed upon between the Proponent and relevant road authorities.
 5. Prior to the commencement of construction on-site, the Proponent must undertake all works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable for use by heavy vehicles to meet any reasonable requirements that may be specified by the relevant roads authority. The design and specifications, and construction, of these works must be completed and certified by an appropriately qualified person to be to a standard to accommodate the traffic generating requirements of the project. On Classified Roads the geometric road design and pavement design must be to the satisfaction of the Roads and Maritime Services.
 6. Glint and glare from the solar panels shall not cause a nuisance, disturbance or hazard to the travelling public on the public road network. In the event of glint or glare from the solar plant being evident from a public road, the proponent shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.
 7. Any works within the road reserve of the Sturt Highway or the Kidman Way requires approval under Section 138 of the Roads Act, 1993 from the road authority (Council) and concurrence from Roads and Maritime Services prior to commencement of any such works. The developer is responsible for all public utility adjustment/relocation works, necessitated by the development and as required by the various public utility authorities and/or their agents.
 8. All works associated with the project shall be at no cost to the Roads and Maritime Services.

Under the provisions of the Environmental Planning & Assessment Act the Consent Authority is responsible to consider any likely impacts on the natural or built environment. Depending on the level of environmental assessment undertaken to date and nature of the works it may be necessary for the developer to undertake further environmental assessment for any ancillary road works required as a condition on the development.

Any enquiries regarding this correspondence may be referred to the Manager, Land Use for Roads and Maritime Services (South West Region), Maurice Morgan, phone (02) 6923 6611.

Please forward a copy of the Notice of Determination for this Development Application to the Roads and Maritime Services at the same time as advising the applicant.

Yours faithfully



Per:
Jonathan Tasker
Acting Director
South West NSW