

Brooke Marshall  
Principal – Renewable Energy Assessments  
NGH Pty Ltd  
Suite 11, 89-91 Auckland Street  
Bega NSW 2550

Ref: 167  
21 October 2022

Issued via email: [brooke.m@nghconsulting.com.au](mailto:brooke.m@nghconsulting.com.au)

Dear Brooke

### Blind Creek Solar Farm – Response to Agency Comments

Amber Organisation has been asked to provide a review and response to the agency comments received in relation to the Blind Creek Solar Farm. The comments received from Transport for NSW and Queanbeyan-Palerang Regional Council, and the associated response, are provided below.

**Table 1: Agency Comments and Response**

Comment	Response
Transport for NSW	
The length of the BAR treatment should be extended to comply with Figure A 28 of Austroads Guide to Road Design Part 4. The length for the turning path (X) should be added and the tapers should be designed for a design speed of 110kph.	Detailed design drawings for the site access have been prepared by PHL Surveyors. The design shows a BAR treatment in accordance with the Austroads Guide. The detailed design drawings have been provided within Appendix A.
The table drains on both sides of Tarago Road will have to be reinstated. Cross sections will be required to confirm the roadworks can be contained within the road reserve.	The detailed design plans are understood to have addressed this matter.
TfNSW notes only the section shown in Attachment 3 is approved as a B-double route but the intention is to use B-doubles during construction and deliveries. Clarification is required as to how the applicant intends to utilise B-doubles noting the above.	The use of sections of road that are not rated to accommodate B-Doubles is typically subject to specific permit application process that occurs following approval of the planning permit. As such, it is understood that this matter will be addressed prior to construction as part of the permit process.

<p>Insufficient details have been provided on the use of oversize or overmass (OSOM) and B-Double vehicles during the construction stage (e.g. for transformers, substations, etc). Details are required on any B-Double and OSOM movements associated with the proposal as well as details on the route these vehicles will take and any changes to the road network required to cater for B-Double and OSOM movements (e.g. removal of infrastructure, widening works, vegetation removal, etc). For example the required works (if any) for B-Double and OSOM vehicles to travel to the site through the intersection of Braidwood Road and Wallace Street and also if travelling via Bungendore Road.</p>	<p>Some oversize and overmass vehicles will be required to deliver larger plant to the site such as the sub-station transformer and earthmoving equipment. The vehicles are subject to specific road permits that will be applied for by the contractor once the dimensions of the load and the specific delivery vehicle are known. As this information is unknown at this time a detailed assessment of the route is unable to be provided.</p>
<p>Should it be identified that mitigation measures are required that will impact a state/classified road then a concept design for the proposed works will need to be prepared and submitted as part of the State Significant Development (SSD) assessment process/before SSD determination.</p>	<p>Given the above comments, the assessment of the B-Double and OSOM vehicle route is proposed to be undertaken prior to construction once more information is known, which is the standard approach taken for solar farm projects. Any road upgrades will be assessed as part of these permits.</p>
<p><b>Queanbeyan-Palerang Regional Council</b></p>	
<p>Traffic volume data is taken from TfNSW traffic volume viewer from 2008 and a growth rate applied to calculate the volumes for 2021. It should be noted that a small error in adopted growth rate can have a significant cumulative impact over the course of a 13 year period. QPRC would expect that proposed State Significant Development would warrant on-site traffic counts to be commissioned for the acquisition of factual data and the removal of error and doubt from any calculations and/or assumptions. On this basis QPRC consider the traffic impact assessment to be fundamentally flawed.</p>	<p>A tube count was commissioned for Tarago Road adjacent to the site access from Monday 1 August 2022 to Sunday 7 August 2022. The tube count recorded the following:</p> <ul style="list-style-type: none"> <li>• An average traffic volume of 1,363 vehicles per day;</li> <li>• The morning peak hour recorded an average of 117 vehicles per hour; and</li> <li>• The evening peak hour recorded an average of 120 vehicles per hour.</li> </ul> <p>The survey results indicate Tarago Road currently accommodates a low level of traffic. The site is expected to generate in the order of 57 vehicle movements in the peak hour during peak construction. At this time Tarago Road would accommodate up to 177 vehicles in the peak hour. Accordingly, Tarago Road would continue to operate with a good level of service (Level of Service A) based on Table 4.5 of the RTA Guide to Traffic Generation Developments.</p> <p>Therefore, the road network is able to readily accommodate the increase in traffic generated by the solar farm during construction.</p> <p>The tube count data can be provided upon request.</p>
<p>Section 2.4 of the report asserts that there are no public transport services within the vicinity of the site. This statement does not account for school bus services.</p>	<p>Bungendore Bus and Coach has a minibus that leaves the bus depot at 6:25am that travels to Mount Fairy Road and then returns to Bungendore by 7:15am. A large bus leaves Bungendore at 7:50am and travels to Taylors Creek Road and travels back to Bungendore by 9:00am. The large bus leaves Bungendore Primary School at 3:10pm and travels to Taylors Creek Road and returns by 4:15pm. The minibus leaves Bungendore at 4:35pm to Mount Fairy Road and is back at Bungendore by 5:25pm.</p> <p>It is recommended that heavy vehicle movements occur outside of times when school buses will be present on Tarago Road.</p>



<p>Both average and peak VPD during construction comprise a significant percentage of the assumed traffic volume as calculated from assumptions in point 1 above:</p> <ol style="list-style-type: none"><li>6.5% to 13.6% for light vehicles (assuming the same Light to Heavy split noted in Table 1).</li><li>19.2% to 96% for heavy vehicles (assuming the same Light to Heavy split noted in Table 1).</li></ol> <p>The maximum peak of staff on-site for construction activities does not match the maximum peak in VPD attributed to the development. i.e. Peak staff rate of 300 and peak VPD of 170. The report contains no rationale to describe how modes of transport may achieve such a discrepancy between worker and vehicle numbers nor does it confirm whether the 300 staff noted include any of the HV drivers who would likely spend the majority of their day off-site.</p>	<p>The traffic volume information has been provided by the Applicant who has advised that shuttle buses will be available to transport some staff to reduce the number of light vehicle movements. The details of how these vehicles will be provided is proposed to be documented within the Construction Traffic Management Plan which will be prepared by the appointed contractor prior to construction.</p> <p>As outlined above, Tarago Road is expected to operate with a good level of service and the crash search presented within the Traffic Impact Assessment indicates the road network is currently operating in a relatively safe manner. Accordingly, the light and heavy vehicle movements associated with the solar farm are expected to be able to be suitably accommodated on the road network.</p>
<p>The OSOM (Over-size / Over-mass) vehicle described in the swept path assessment appears to be a vehicle that will require a police escort as part of any approval to operate on the subject road network.</p>	<p>The OSOM vehicles are subject to specific road permits that will be applied for by the contractor once the dimensions of the load and the specific delivery vehicle are known. Road management techniques, such as police escorts, will be determined at this time.</p>
<p>The traffic impact assessment is generally constrained to Tarago Road without sufficient consideration and assessment of the impact on other nearby roads.</p>	<p>Given Tarago Road accommodates a low level of traffic and traffic movements associated with the solar farm will be further disbursed on the wider road network it is considered that the wider road network is also able to readily accommodate the traffic volumes generated by the solar farm.</p>
<p>The assessment does not address financial reparations for damage to the road caused by the increased construction traffic associated with the development.</p>	<p>Any financial reparations are considered to be a matter to be discussed between Council and the Applicant.</p>

If you have any questions please feel free to contact the undersigned.

Yours sincerely  
**Amber Organisation**

Michael Willson  
**Director**

## Appendix A

### Site Access Intersection Design

MGA



UNLESS OTHERWISE STATED  
DO NOT USE THESE PLANS TO  
LOCATE UNDERGROUND  
INFRASTRUCTURE. USE  
CURRENT DBYD INFORMATION.

AUSTROADS 2017

FIGURE A28

X=15m (TURNING VALUE)

S=20m (STORAGE)

V=110kph (SPEED)

F=3.4m (WIDENING)

$$A = \frac{0.5 \times 110 \times 3.4}{3.6} = 52\text{m (say 54m)}$$

DP 1154765

REPLACE CATTLE GRID

NEW 375mm RCP

EDGE OF EXISTING ROAD

SEAL WIDENING

EARTHWORKS &amp; REHABILITATION

EXISTING SEAL

ORIGINAL A3 SHEET

100mm

## NOTES:

1. 500mm GRAVEL SHOULDER TO BE CONSTRUCTED OUTSIDE SEAL
2. SAWCUT EXISTING BITUMEN & KEY PAVEMENT TO EXISTING GRAVEL
3. PAVEMENT TO GEOTECH DESIGN

10/08/2022	1A	ISSUE TO CLIENT	AL
DATE	NO	REVISION	AUTHORISED
PLAN REVISIONS			

COMMENTS:

DATUM AHD ORIGIN RL  
COORD.SYSTEM MGA 2020 ORIGIN



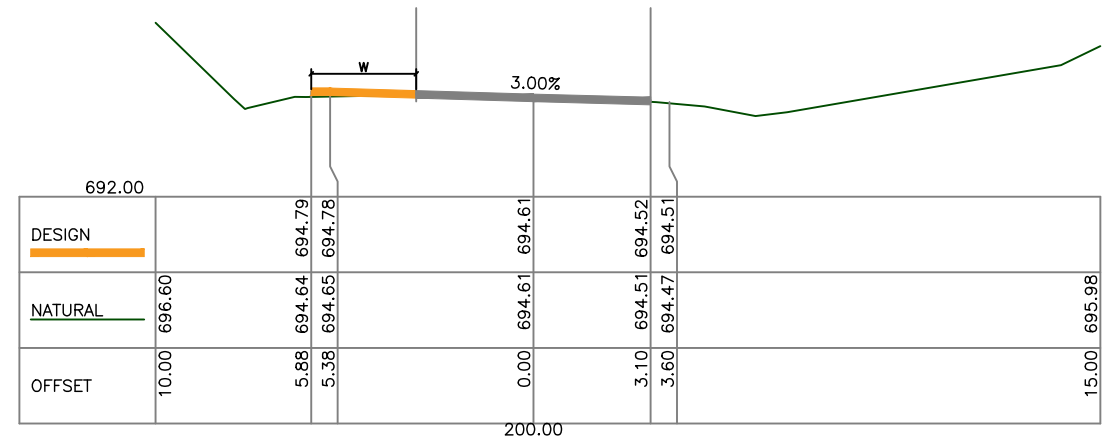
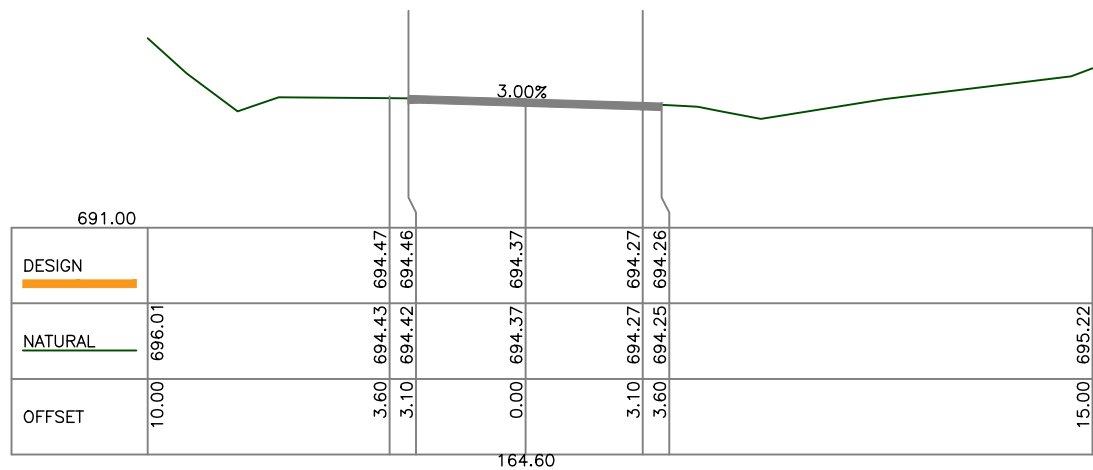
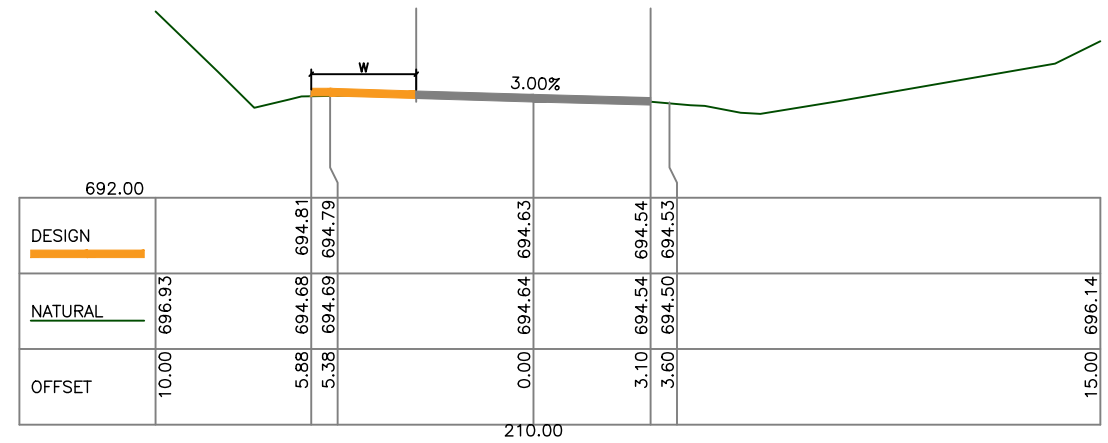
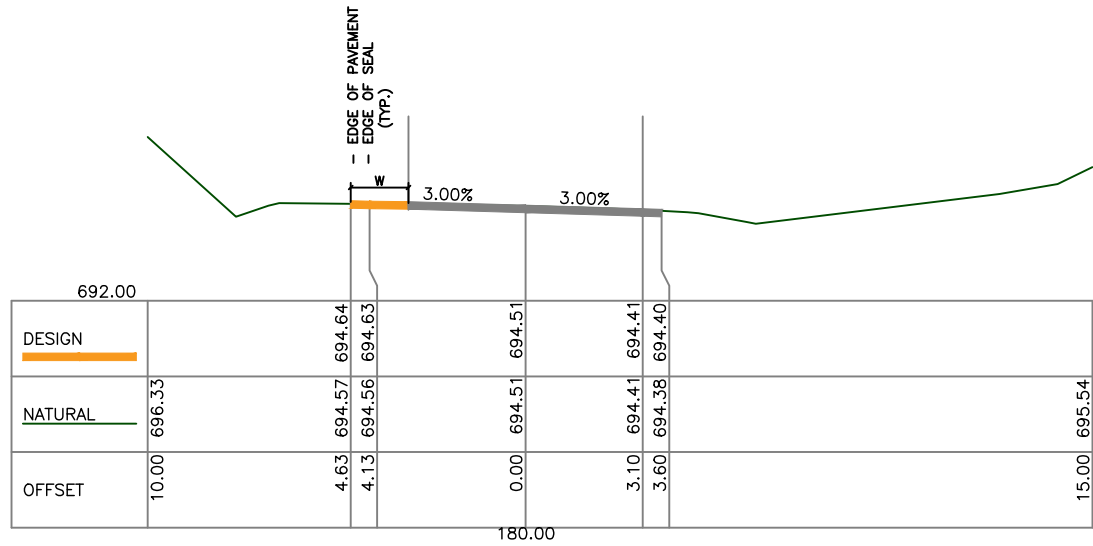
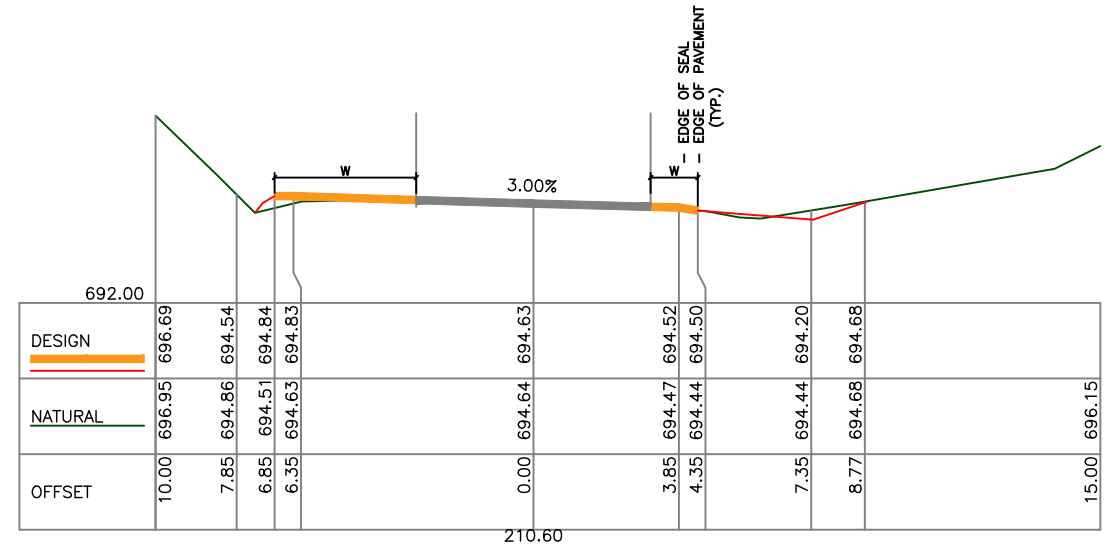
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CLIENT: **BLIND CREEK SOLAR FARM**  
TITLE: **114 CURRANDOOLEY ROAD BUNGENDORE**  
**LOT 1 DP 1154765**  
**ENTRANCE DESIGN**  
**PLAN VIEW**

SCALE: 1:600

FILE: PN 12613	A3- 548738_1A
ACAD: 12613B22-1	CCAD: 12613B22
DRN: MB	CHK: AL
SHEET 1 OF 5	SHEET(S)

LIABILITY LIMITED BY A SCHEME UNDER PROFESSIONAL STANDARDS LEGISLATION



Scale Horizontal 1:200 Vertical 1:200

EXISTING SEAL  
W PAVEMENT WIDENING

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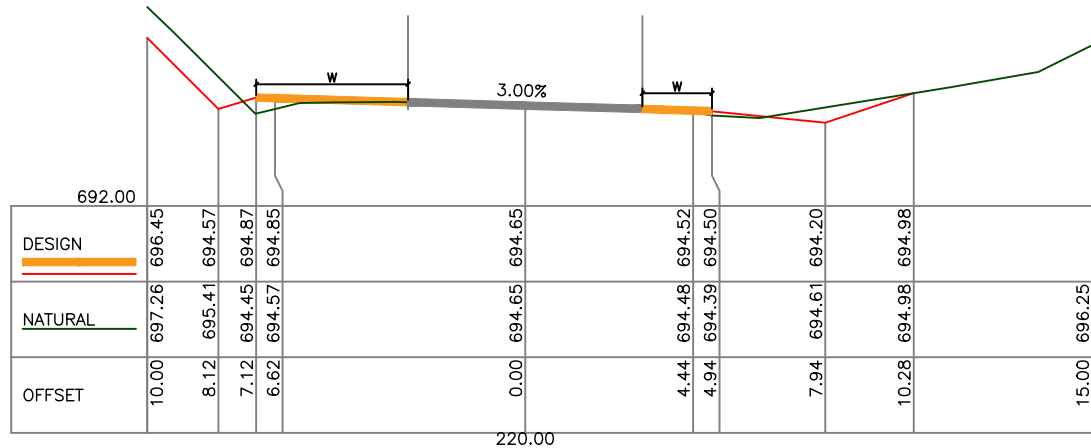
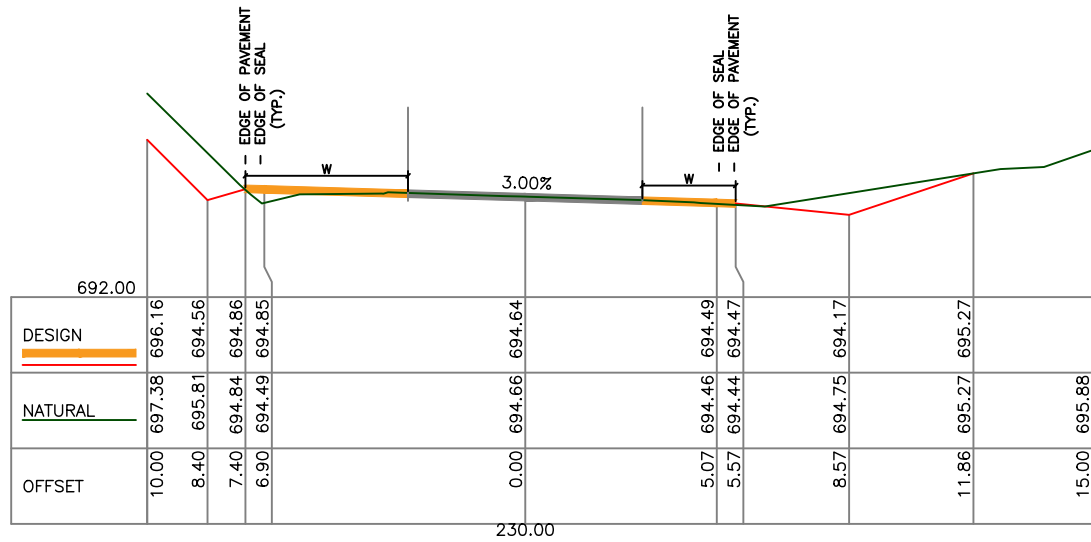
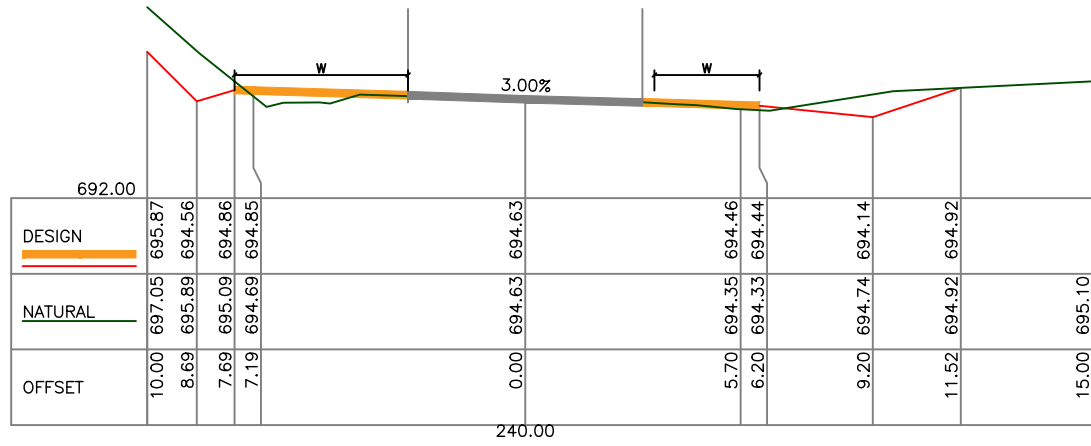
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DATUM AHD	ORIGIN	RL
COORD.SYSTEM MGA	2020	ORIGIN



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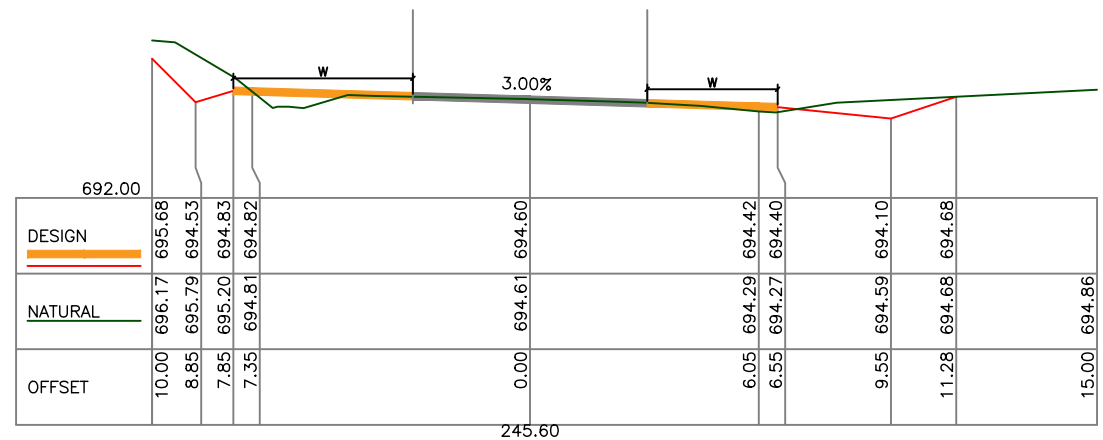
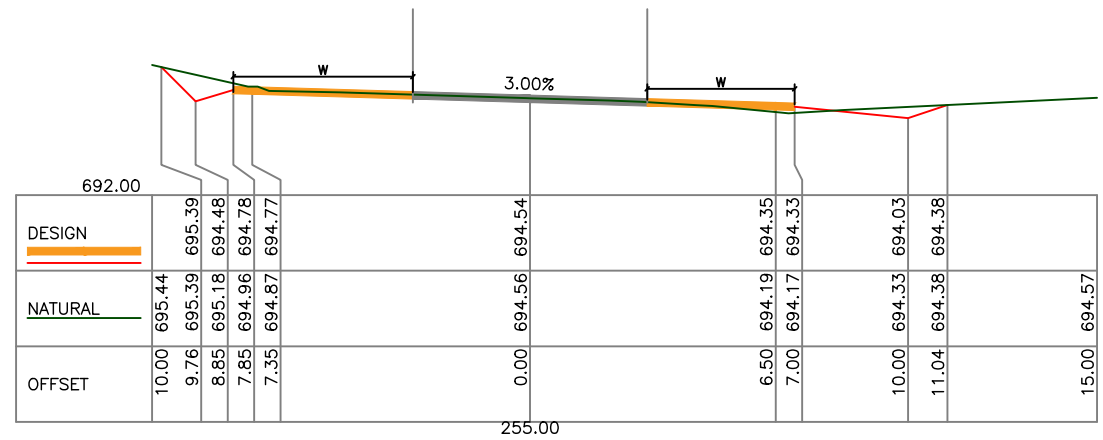
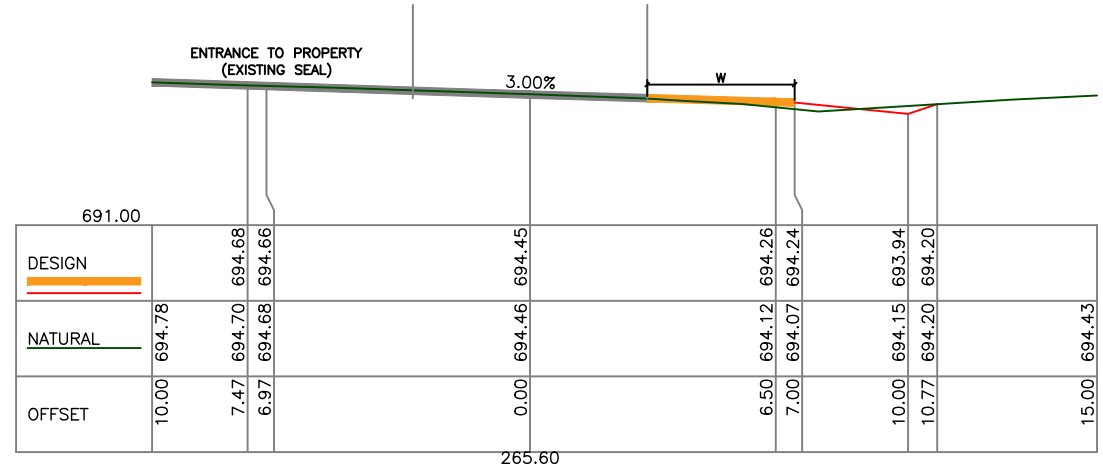
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TITLE: 114 CURRANDOOLEY ROAD BUNGENDORE  
LOT 1 DP 1154765  
ENTRANCE DESIGN  
CROSS SECTIONS – TARAGO ROAD

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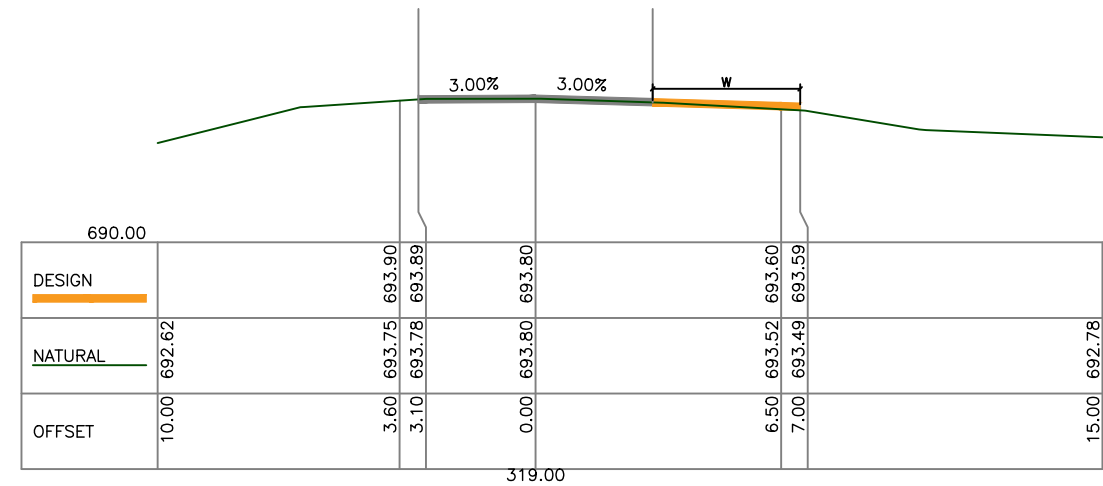
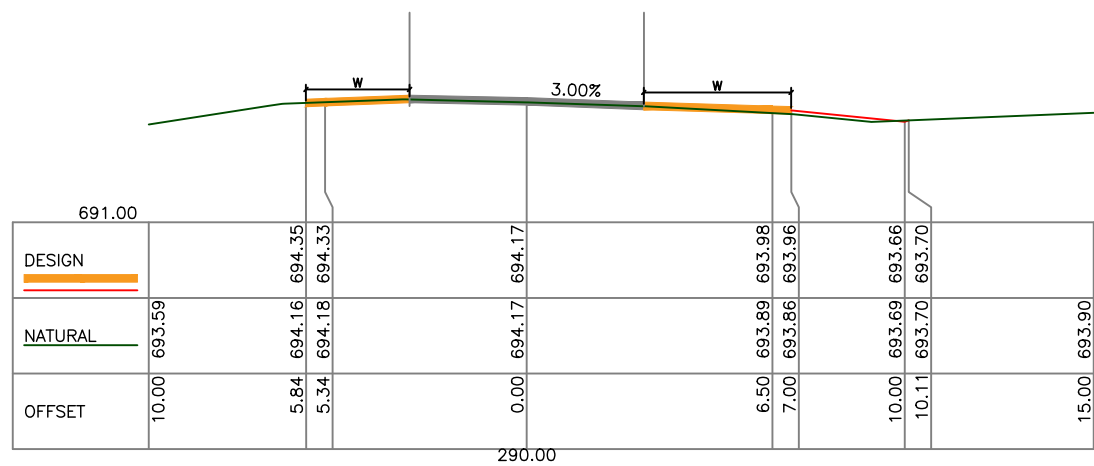
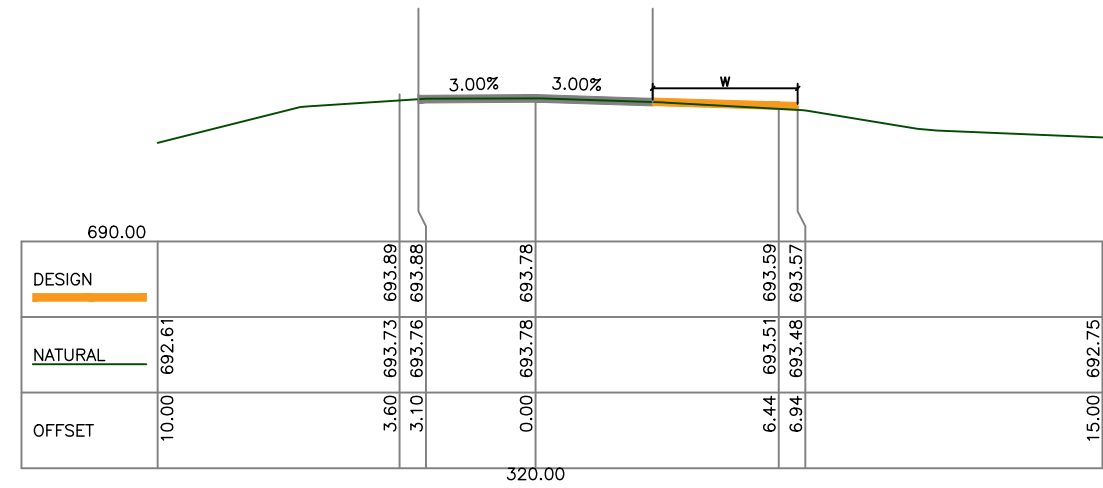
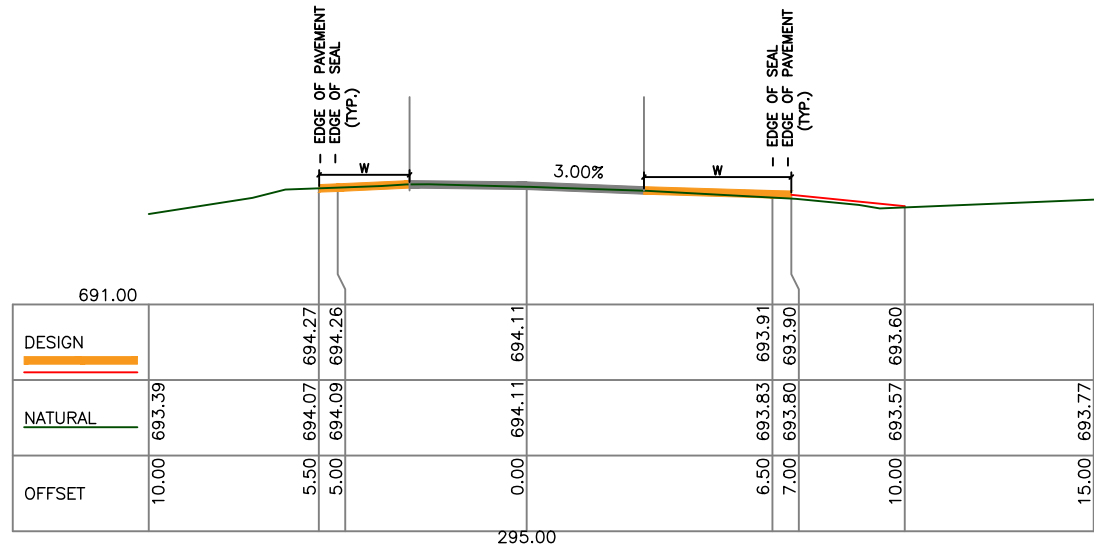
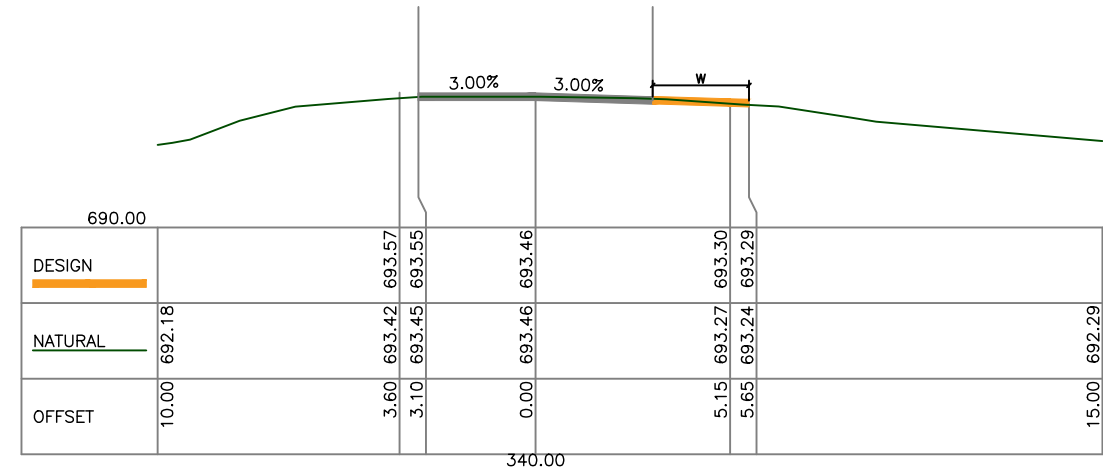
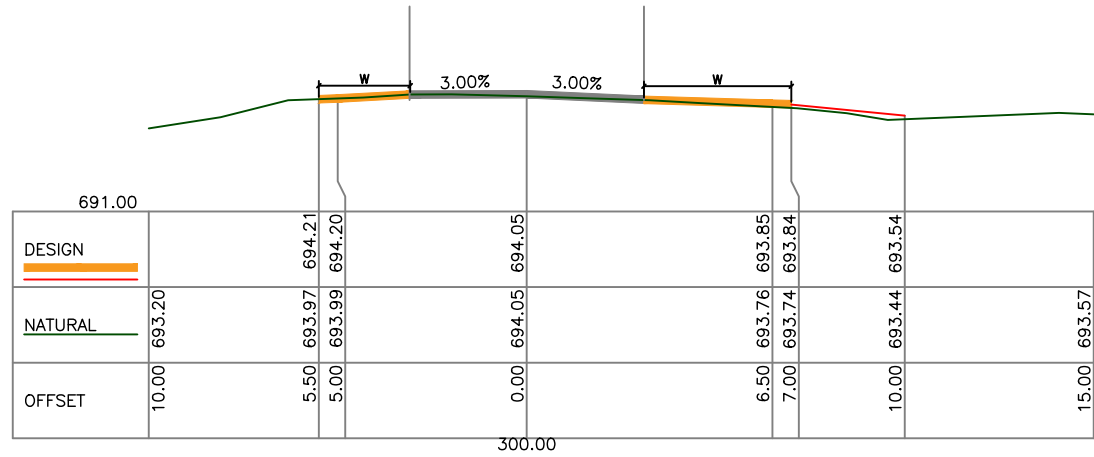
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EXISTING SEAL  
W PAVEMENT WIDENING



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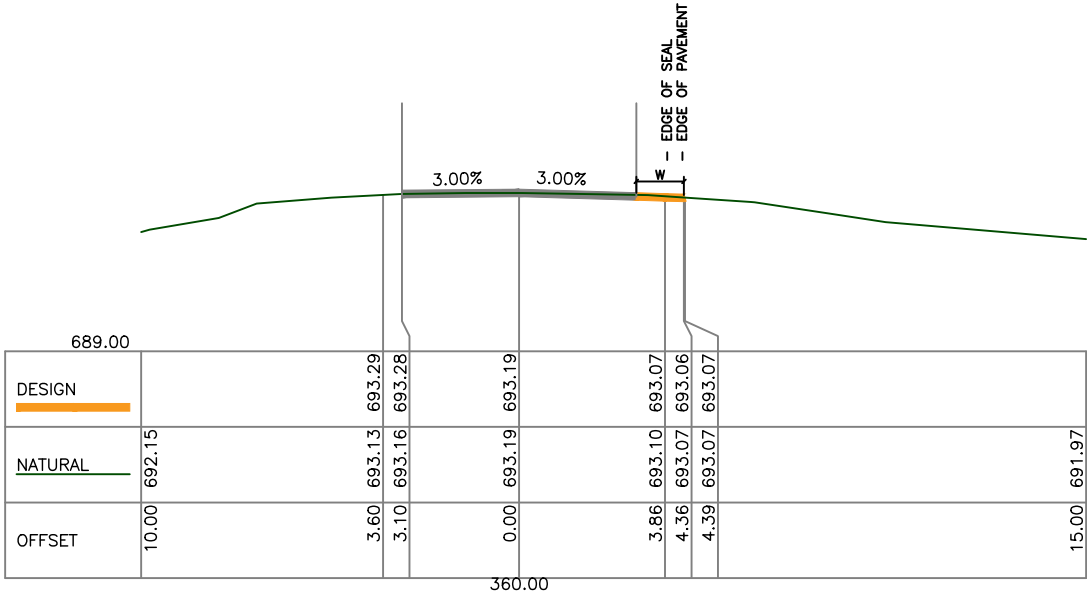
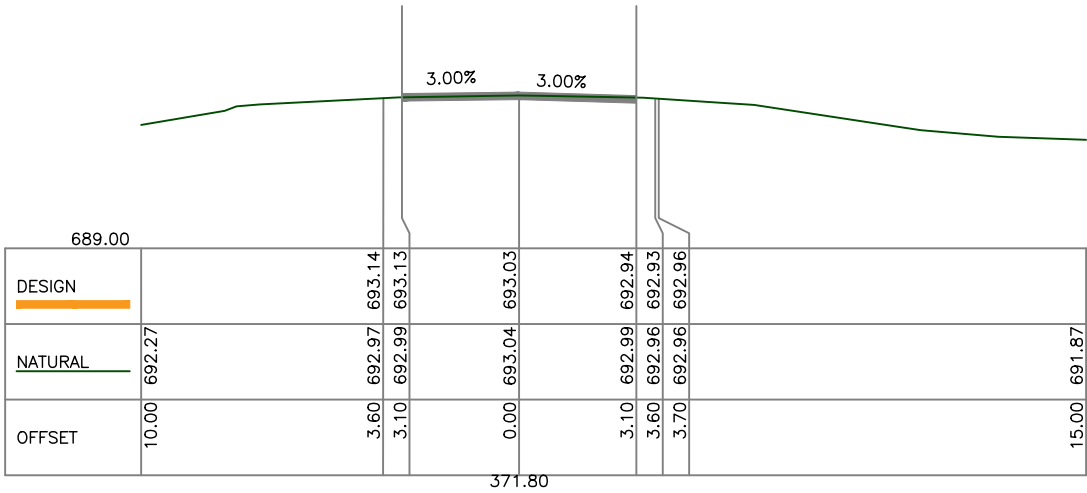
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CROSS SECTIONS – TARAGO ROAD

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DRN: MB	CHK: AL
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100mm



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EXISTING SEAL  
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