

7 August 2018

SWT17/00127 SF2017/217800 MM

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

Attention: Natasha Homsey

SSD-8703 - PROPOSED SPRINGDALE SOLAR FARM - TALLAGANDRA LANE, SUTTON - LOTS 111, 10, 190, 189, 54, 97, 182, 15,209, 161 & 202 DP754908, LOT 1 DP19833

I refer to your correspondence regarding the subject Application which was referred to the Roads and Maritime Services for assessment and comment.

Roads and Maritime Services has reviewed the Environmental Impact Statement dated June 2018 prepared by AECOM for the Springdale Solar Farm. From the information provided it is understood that the proposal is for the establishment and operation of a solar photovoltaic (PV) facility and associated infrastructure on the subject site with a proposed capacity of 100 MWac on the subject site.

The development site is located to the north of Sutton and is proposed to be accessed from Tallagandra Lane which is classed as a local road therefore any access driveway should be consistent with the requirements of the Council. The development proposal also includes the realignment of Tintinhull Road. This should also comply with the requirements of the Council as it is a local road. As a minimum the design of the proposed new road and its intersections with the existing public road network shall comply with the requirements of the Austroads Guide to Road Design, particularly the sight distance criteria, for the posted speed limit for road safety reasons.

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 construction period is to be approximately 10 Months. The documentation identifies the proposed haulage route for the components for the development but does not appear to address the source of, or the preferred route for the delivery of, other products, such as the aggregate, water and sand for construction of the development.

The development site is remote from the classified road network however due to the location of the development site to the north of Sutton the transportation of the components for the development will be via the Federal Highway and Sutton Road, which are both classified roads and then to East Tallagandra Lane, which is classed as a local road. The haulage route is through the urban area of Sutton therefore consideration needs to be given to potential impacts on this urbanised area. The haulage route from the Federal Highway is limited to general access vehicles only therefore transportation of components is limited to 19 m articulated heavy vehicles or smaller. Transportation of the transformer to the site will require will require a special permit for and oversize and over-mass vehicle.

Section 14.3 of the EIS lists mitigation and management measures to address traffic issues which includes the preparation of a Traffic Management Plan for the construction period. 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. Rather than adopting the route as outlined in the submitted documentation the Traffic Management Plan would provide an opportunity to better understand and define the transportation route for delivery of the components and specialist vehicles to the development site.

Roads and Maritime is mainly concerned with the impact of the development on the safety and efficiency of the road network. Roads and Maritime emphasises the need, particularly in the construction phase of this development, to minimise the impacts on the existing road network and maintain the safety, efficiency and standard of maintenance along the existing road network and to minimise the impact and distraction to the road user.

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. A Haulage 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) Require that delivery of components to the site be via the route adopted and approved as part of the Traffic Management Plan,
 - ii) Consideration of measures to address potential impacts of haulage of materials and component through the urbanised area of Sutton,
 - iii) Details of traffic routes to be used by heavy and light vehicles, and any associated impacts and any road-specific mitigation measures.
 - 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,
 - vii) loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles.
 - 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. Any works within the road reserve of Tocumwal Road 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.
- 3. All works associated with the project shall be at no cost to the Roads and Maritime Services.

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Further to the above the following conditions may also be appropriate for road safety reasons

- 1. 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.
- 2. 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 establishment of a barrier (e.g. fence, advanced plantings) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.

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.

<u>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.</u>

Yours faithfully

Per: '
Jonathan Tasker
Acting Director
South West NSW

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