



13 November 2020

File No: NTH18/00138/03  
Your Ref: SSD-9619

The Director  
Department of Planning Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Javier Canon  
[Javier.Canon@planning.nsw.gov.au](mailto:Javier.Canon@planning.nsw.gov.au)

Dear Sir / Madam,

**RE: State Significant Development (SSD 9619) – Tilbuster Solar Farm Lot 1 DP 225170, Lot 1 DP 585523, Lot 3 DP 800611, New England Highway, Tilbuster.**

I refer to your email of 15 October 2020 requesting advice from Transport for NSW (TfNSW) in relation to the abovementioned development application.

### **Roles and Responsibilities**

From 1 December 2019, all functions and responsibilities of Roads and Maritime Services will now be vested in an integrated Transport for NSW (TfNSW). Our key interests are for the safety and efficiency of the transport network, the integrity of State infrastructure and the integration of land use and transport in accordance with *Future Transport Strategy 2056*.

New England Highway (HW9) is a classified (State) road and Armidale Regional Council is the Roads Authority for all public roads (other than freeways or Crown roads) in the local government area pursuant to Section 7 of the *Roads Act 1993*. TfNSW is the Roads Authority for freeways and can exercise roads authority functions for classified roads in accordance with the Roads Act. Any proposed works on a classified (State) road will require the consent of TfNSW. Consent is provided under the terms of a Works Authorisation Deed (WAD).

In accordance with Cl.101 of the *State Environmental Planning Policy (Infrastructure) 2007* the Consent Authority is to have consideration for the safety, efficiency and ongoing operation of the classified road as the development has frontage to a classified road. TfNSW is given the opportunity under Cl.104 to comment on development application listed under Schedule 3.

### **Transport for NSW Response**

TfNSW has reviewed the development application and provides the following comments to assist the consent authority in requesting further information to inform a determination;

It is understood that the proposal is for a 150 MW AC Solar Farm, located in the Tilbuster locality, approximately 17kms North of Armidale on the New England Highway.

#### **1. Background traffic data & traffic generated by the development.**

TfNSW notes the following inaccuracies and / or contradictory information provided in the Environmental Impact Statement (EIS) and Traffic Impact Assessment (TIA).

- Throughout the EIS, in particular in *Sections 4.6.4 and 8.6.2 and Tables 4-5 and 8-33* and in the TIA, there are contradictory statements in regards to the estimated and calculated numbers of traffic generated by the development including number of vehicles required and the associated vehicle movements. This is particularly evident for the peak construction period in regards to the movements to and from site for the 125 employees. These contradictions include, but may not be limited to:
  - The number of shuttle buses and light vehicles required to transport the staff, including the occupancy rates for both vehicle types, the accuracy of the calculations and the total number of daily vehicle movements the site will generate (102 or 140).
  - There is confusion over the total numbers provided per vehicle type and if they represent the number of vehicles (one way) or the total two way movements of the vehicles arriving and departing from site.
- TfNSW notes that the background traffic data Annual Average Daily Traffic (AADT) volume provided is not robust enough to complete an assessment on for the development. The background AADT sourced via the *RMS Traffic Volume Viewer* website for Station ID: 92065, appears to be 2011 data and not 2013 as stated throughout the report. Once the proposed growth rate has been applied in the report, the current year's estimate appears to be incorrect.

Furthermore, the AM and PM peak data for Station ID: 92065 was also available along with the AADT, but has not been used in the EIS or TIA. These values are higher than those presented in the estimated the Peak Hour volumes. Further assessment is required to be undertaken on the higher values with both the proposed generated and background traffic has been to ensure all safety issues and risks associated with the development have been addressed.

TfNSW recommend that the Consent Authority request further assessment be undertaken which reflects the updated background traffic data, including AADT and peak hour traffic, specifically addressing the period in which the construction is proposed to be undertaken. This assessment should also clearly identify the correct values, calculations and volume of traffic generated by the development.

## 2. Proposed site access and intersection upgrades.

TfNSW understands that the development proposes to realign the existing site access off of the New England Highway, at approximately 90 degrees to the road alignment. It is also understood that an *Austroads* turn warrant assessment was undertaken for this site access road intersection, determining that a Basic Right Turn (BAR) and an Auxiliary Left Turn (AUL) were required to upgrade the intersection for the use of the development.

- It is noted that the development proposes to build a lower order turn treatment, a Basic Left Turn (BAL) instead of the *Austroads* required AUL treatment. TfNSW have previously advised that a lower order treatment would be considered for the project, if it could be supported with sufficient justification and mitigation measures to manage the traffic generated by the development. The EIS and TIA propose to create a Construction Traffic Management Plan (CTMP) in which such mitigation measures would be addressed, but do not present clear defined measures that can be assessed at this time to support the lower order treatment.

TfNSW also notes that the turn warrant assessment was undertaken based on the identified inaccurate background AADT, lower volume (estimated) peak hour traffic and the lower volume of traffic generated by the development.

TfNSW recommend that the Consent Authority request that the applicant undertake further *Austroads* turn warrant assessment/s with the updated background traffic and development generated traffic volumes. Furthermore TfNSW request a CTMP be included in the EIS prior to determination, to address all proposed mitigation measures to support the applicant's proposal.

- The internal access road, site access intersection, manoeuvring areas and parking areas should be suitable for the relevant design vehicles. It should be noted that the Swept Paths provided for the site

access intersection are for a 19m Single Articulated Vehicle (AV), however, a 19m B-Double is often referred to throughout the EIS and TIA as an alternate design vehicle.

The Single AV swept path appears to demonstrate very little room for readjustment or clearance between vehicles when a Single AV is turning into the site access and another is in a stationary position preparing to exit. The swept path of a B-double will be different to the Single AV and is required in addition to the Single AV to clearly demonstrate that the vehicle can successfully complete the required movements without crossing the centre-line of both the New England Highway and the site access road, therefore ensuring the proposed upgrades will accommodate both of the key proposed design vehicle/s.

TfNSW recommend that the Consent Authority request further Swept Path assessments be undertaken for the B-Double vehicle (and any other OSOM vehicle, if applicable). The site access design should be amended, if warranted by the additional swept path/s and the internal realigned road be widened to comfortably accommodate the clear movement of two way traffic for the largest design vehicles.

It should be noted that the proposed intersection upgrade is state works and is subject to the terms of a Works Authorisation Deed (WAD), see further comment below. Please note that TfNSW will assume the role of the Roads Authority in granting any consents required by Section 138 and Section 61 of the *Roads Act 1993*.

### 3. Heavy vehicles & haulage routes

TfNSW seek further clarification in regards to the vehicles proposed for the transportation of the components, construction and infrastructure materials and / or machinery.

- TfNSW notes, that the Transformer(s) and 200 Tonne Crane(s) will require Over-Size Over-Mass (OSOM) specialist vehicles to be transported to site, however the vehicle types, dimensions, weights and configurations of the loads have not been provided or clarified. Furthermore, it is unclear if the OSOM items will also be transported along the same proposed haulage route as the bulk of the materials from Port Botany. This information should be included in the CTMP, addressing any pinch points (including a Route Assessment and bridge assessment, if applicable), providing explanation on how risks and movements will be mitigated.
- In addition to seeking further information about the OSOM items, TfNSW seek further information in regards to the proposed haulage route/s from the Port of Botany and the local regions. It is unclear which vehicle types will be used, or how many vehicles & associated movements will be required to transport the bulk of the imported and manufactured materials from Port Botany as opposed to those transporting materials locally. This information is required to understand the impacts of the development on the safety, efficiency and ongoing operation of the classified state road network.

TfNSW recommend that the Consent Authority request the OSOM loads be addressed further in the CTMP and that further assessment be undertaken to provide additional information in regards to the proposed haulage of components, construction materials and / or machinery from the two identified regions. This should include but not be limited to, the vehicle specifications, load dimensions & weights (for OSOM), the expected haulage routes, including assessment of any key intersections or bridges where applicable, and the trips generated by the identified haulage activities. This additional information should be included in the EIS, TIA and CTMP for further review prior to determination.

### **Advice to the Consent Authority**

Any roadwork required by the Consent Authority on the classified (State) road will need to be designed and constructed in accordance with the current Austroads Guidelines, Australian Standards and [TfNSW Supplements](#).

The developer will be required to enter into a Works Authorisation Deed (WAD) with TfNSW for any roadwork deemed necessary on the classified (State) road. The developer will be responsible for all costs associated with the roadwork and administration for the WAD. It is recommended that developers familiarise themselves

with the requirements of the WAD process. Further information regarding the WAD process is available on the TfNSW [website](#).

TfNSW highlights that in determining the application under the Environmental Planning and Assessment Act 1979, it is the Consent Authority's responsibility to consider the environmental impacts of any road works which are ancillary to the development. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of project approval.

If you have any further enquiries regarding the above comments please do not hesitate to contact Katrina Wade, Development Assessment Officer or the undersigned on (02) 6640 1362 or via email at: [development.northern@rms.nsw.gov.au](mailto:development.northern@rms.nsw.gov.au)

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Katrina Wade', with a horizontal line extending to the right.

for Matt Adams  
Manager Land Use Assessment Northern  
Regional NSW and Outer Metropolitan  
Transport for NSW