Transport for NSW

WST21/00074/04 | SF2021/040050



Energy Assessments
Department of Planning & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Javier Canon

SSD-14757962 for Peninsula Solar Farm at Paytens Bridge Road, Forbes NSW Lot 441 DP 1124885, PT Lot 442 DP1124885 and PT Lot 9 DP752938

26 October 2022

Dear Javier,

Thank you for referring the abovementioned application via the NSW Major Projects Planning Portal on 27 September 2022 inviting comment from Transport for NSW (TfNSW).

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

TfNSW understands that the proposal seeks approval for the construction, operation and decommissioning of an 80MWac Solar PV and 80 MW / 160 MWh BESS, within an approximately 290Ha project site. The project also includes the construction of an on-site substation adjacent to and used to connect into the existing 132 kV power line. Access to the site is proposed to be provided directly from Paytens Bridge Road.

It is further understood that the proposal is projected to generate in the order of 70 daily return trips during the peak construction period (35 inbound: 35 outbound). A peak of up to 250 staff are expected on-site during construction activities and will likely be bussed in predominately from Forbes and the surrounding towns. Construction activities would be undertaken from 7:00am to 6:00pm Monday to Friday and 7:00am to 1:00pm on Saturdays.

Delivery vehicles into and out of the site during the construction stage (16 months) will be undertaken predominately by 19m semi-trailers (some overmass transport is required). The delivery route for imported solar farm components is proposed to be transported from Port Botany either: via rail to Mountain Industries Rail siding then to site via Lachlan Valley Way or New Grenfell Road (2 options); or, direct from Port Botany entirely via road.

TfNSW has reviewed the information provided, including a *Traffic Impact Assessment*, prepared by Impact Traffic Engineering Pty Ltd, dated 24 August 2022 and the *Environmental Impact Statement*, prepared by Accent Environmental Pty Ltd dated 5 September 2022, and is not satisfied that the proposed development has adequately addressed the anticipated construction traffic impact on the classified road network. Accordingly, TfNSW does not support the application as proposed.

TfNSW recommends that DPE ensure that the following matters are addressed should any further submissions be made for comment:

TfNSW raised the following comment in SEARs dated 18 March 2021:

Transport for NSW

An assessment of the likely transport impacts to the site access route (including, but not limited to, Paytens Bridge Road, New Grenfell Road, Lachlan Valley Way, Hume Highway, the Newell Highway and the Stockinbingal-Parkes railway line), site access point(s), any Crown land, particularly in relation to the capacity and condition of the roads, road safety and intersection performance.

This matter must be addressed in a revised TIA.

- The traffic impact of the road only route identified as the 'second alternative / secondary access' in the TIA needs to be assessed in more detail, including (inter alia) the impact on traffic and road safety on the classified roads. Consideration should be given to providing a road safety assessment of the key haulage route, identifying any weight limits on the route and identifying necessary intersection upgrades (as required).
- It is understood that all three of the proposed haulage routes includes transportation via Lachlan Valley Way (HW56). Traffic counts are required for Lachlan Valley Way, north and south of Paytens Bridge Road, including a peak hour intersection traffic count at the intersection of Lachlan Valley Way and Paytens Bridge Road.
- The TIA assumes that five (5) buses will shuttle the 250 staff between the subject site and the accommodation at Forbes and the surrounding towns. TfNSW does not consider it is reasonable to assume that all staff associated with construction will be transported by bus or that all buses will be at full capacity. In TfNSW's experience is that staff take up of buses are low without incentives or conditions of employment to use buses. Without firm enforceable commitments to commute to and from the subject site with the buses provided, it is likely that the development will generate a significant amount of light vehicle traffic. In our experience, "encouraging" to use the bus is not enough. TfNSW requests that a worst-case scenario of traffic impacts needs to be analysed, where a majority of the staff commute to and from the site is using light vehicles. In this case, the expected pick up / drop off locations, in addition to townships where staff will be commuting from is to be provided.
- The TIA provides daily anticipated one-way peak construction traffic. The cumulative traffic volumes of light and heavy vehicles at the AM/PM peak needs to be provided and subsequently, an intersection performance analysis at key intersections with classified roads with the cumulative traffic volumes.
- The TIA has not reviewed any crash history. The TIA needs to provide a review of the crash history, especially at key intersections along the haulage route.
- The Traffic Impact Assessment (TIA) identifies that New Grenfell Road carries in the order of 440 vehicle movements on a daily basis. The location of the traffic count needs to be specified.

If you wish to discuss this matter further, please contact the undersigned on ph. 0481-068-175.

Yours faithfully,

Kylie-Anne Pont

Kyli-Anne Pont

Team Leader Development Services West Region | Community and Place Regional and Outer Metropolitan