The future happens here

7 July 2022

Andy Nixey
Energy Assessments
Planning & Assessment
Department of Planning and Environment

Via email: Andy.Nixey@planning.nsw.gov.au

Dear Mr Nixey,

Re: Walla Walla Solar Farm – Modification 2 (SSD 9874 – Mod 2)
Response to RFI dated 1 July.2022

FRV writes with reference to your letter dated 1 July 2022, requesting further information regarding the above proposed modification.

FRV understands that DPE is seeking additional information regarding the proposed increase in heavy vehicle numbers, and potential impacts of the internal access road. FRV can provide the following information in response to the Department's request:

1. Clarify that the proposed increase in peak daily heavy vehicle numbers to 110 incorporates all heavy vehicles that do not require an escort/pilot vehicle.

   FRV proposes that any heavy vehicles not requiring an escort or pilot vehicle should form part of the project's daily heavy vehicle limits, and should not be considered as 'over-dimensional vehicles'. FRV confirms this would not result in any increase to the proposed maximum limit of 110 heavy vehicles per day.

   Given the small number of these vehicles over the course of the construction schedule, these vehicles can be easily absorbed within the project's proposed heavy vehicle limits with appropriate scheduling. FRV notes that the bulk of those vehicle movements are proposed to occur outside of the peak construction period.

2. Provide further justification that the proposed increase in construction traffic within the site would not result in increased amenity impacts to residential receivers in Benambra Road.

   As part of this modification, FRV proposes to construct an internal heavy vehicle access road as an alternative to using the unsealed section of Benambra Road, following concerns from the community and Council. This would eliminate any significant impact to the unsealed section of road, and would also significantly reduce any interactions with local traffic along the narrow stretch of Benambra Road. FRV also considers that this would reduce amenity impacts to users along Benambra Road, in particular impacts associated with dust and noise from heavy vehicles.

   Whilst the precise final layout of the project has not been finalised, FRV's indicative layout provides an approximate distance of the internal access roads from nearby receivers as shown in Table 1, below.

Receiver	Approximate Distance from Internal Road
R1a	620 m
R2	900 m
R5a	1900 m
R6	2300 m

   It should be noted that whilst the distances above are approximate values only, that the distance will not vary considerably in the project's final layout. FRV notes that the Final Layout Plans must be submitted to the Department before construction, under condition 5 of Schedule 4 of the consent.

   The closest receiver to the approved transport route is R1a, situated approximately 70 m from the unsealed section of Benambra Road. The modification, if approved, would increase the distance of any heavy vehicles from R1a by approximately 550 m.

It should be noted that there would be only a maximum of 30 heavy vehicles per day travelling along the internal access road, and that this would only occur during the substation's peak construction period of 4-6 weeks. At other times during the project's construction period, there would be approximately ten vehicles per day travelling within the site.

FRV notes that heavy vehicles travelling within the site are likely to be limited to a significantly reduced speed limit for the safety of construction staff, which will also contribute to a reduction in any noise and dust impacts, further reducing amenity impacts to sensitive receivers. By bringing heavy vehicles within the site, FRV and its contractors will be able to implement a wider array of dust mitigation controls than would otherwise be available on the public road network.

3. Provide justification for the suggested change to Condition 5, Schedule 3 proposed in the Submissions Report.

Condition 5 of Schedule 3 currently requires every vehicle associated with the development, at all stages of the development, to enter and exit the site via the Main Access Point.

FRV notes that a dedicated Substation Access was approved by the Department in November 2020, and that it has never been the intent that every vehicle associated with the development would use the Primary Access.

It is noted that as a condition of the project's agreement with Transgrid, that upon completion of construction FRV must gift the Substation to Transgrid. This means that following construction, the substation would be managed by Transgrid as its own asset, with FRV relinquishing any control over that part of the development.

A requirement of this arrangement is that TransGrid must have unrestricted access to its asset from the public road network. This is the reason why a dedicated substation access was originally proposed by FRV and approved by the Department.

As part of this modification, FRV proposes that all heavy vehicles during construction would be required to use the project's Main Access. This includes all heavy vehicles associated with the construction of the substation. A small number of light vehicles transporting substation construction staff would use the Substation Access.

During operation, all vehicles associated with operation of the FRV's solar farm would continue to use the Primary Access. However, Transgrid vehicles associated with operation of the substation, would require access to the substation via the dedicated Substation Access. Once the solar farm is operational, it will not be possible for these vehicles to access the substation from within FRV's solar farm site.

It is important to note that during operations the substation will not be manned, and that there would be only infrequent light vehicles accessing the substation for maintenance and repair by Transgrid. This would typically occur once every few months in order to maintain the reliability and availability of the NSW electrical transmission network.

Under extremely rare circumstances (if at all), heavy vehicles may be required to enter and exit the Substation Access during operations in order to upgrade, repair or replace substation components. As one might expect, this requirement applies to all electrical substations within NSW operated by Transgrid and other network service providers, and is not specific to Walla Walla Solar Farm.

It should be noted that all of these vehicles and activities would be arranged by Transgrid. FRV would not have any control or input into the scheduling of any of Transgrid's maintenance vehicles or activities.

Yours Sincerely,

Rob Beckett
Project Developer