The Appendix D3 Traffic Impact Assessment dated May 2023 by Amber is grossly incorrect.

<u>Point of Contention #1</u>
The Traffic Impact Assessment is entirely focused on the traffic route to/from the project being via New England Highway and Middlebrook Road. That is, 100% of vehicle movements to and from the project are via that route.

It is mentioned on page 2 Table 1: response to SEARs that transport impacts to Marsden Park Road should be considered.

An assessment of the likely transport impacts to the site access route (including, but not limited to, Middlebrook Road, Marsden Park Road and New England Highway), site access point(s), any Crown land, particularly in relation to the capacity and condition of the roads.	The access route utilises roads that are designated for B-Double vehicles as outlined within the TfNSW Restricted Access Vehicle Map. Middlebrook Road is proposed to be widened to have an unsealed surface width of 7.0 metres which is sufficient to safely allow two trucks to pass. Road dilapidation surveys are proposed to ensure the road is maintained in a suitable working order to allow the safe and efficient movement of vehicles. Accordingly, the roads along the access route are able to accommodate the loads and type of vehicle movement to be generated during construction of the solar farm.

Reading the remainder of the Report, the Traffic Impact Assessment does not assess or consider Marsden Park Road.
Given there is no consideration or assessment of Marsden Park Road, how is the proponent going to ensure 100% of traffic generated by the project utilises the New England Highway and Middlebrook Road only, and prevent any traffic generated by the project using alternative routes to the project such as via Duri-Dungowan Road and Marsden Park Road from the North?

Point of Contention #2
Concerns regarding unrealistic traffic generation forecast.

The peak workforce is noted as 400 personnel per Section 3 (highlighted below)

3. Traffic Assessment

3.1 Traffic Generation

3.1.1 Construction

The solar farm construction is expected to take approximately 21-30 months, with the peak construction period expected to take 18 months. Construction activities would be undertaken during standard daytime construction hours, as follows:

- Monday to Friday: 7am – 6pm
- Saturday: 8am – 1pm
- No work on Sundays or public holidays.

Any construction outside of these normal working hours would only be undertaken with prior approval from relevant authorities.

A maximum workforce of 400 personnel would be on-site during peak construction periods with one shift proposed per day.

Construction traffic generated by the solar farm can broadly be separated into the following four categories:

- Light vehicles associated with transporting the workforce to/from the site;
- A 40 seater shuttle bus is proposed to transport the majority of the workforce between the site and nearby towns;
- Medium and Heavy Rigid Trucks (MRV and HRV) would be used to deliver raw materials and smaller plant;
- Truck and Dog vehicles would be used to transport earthwork material to/from the site; and
- 19 metre long Articulated Vehicles and 26 metre long B-Doubles (AV and B-Double) would be used to transport larger plant.

The proponent notes *"A 40 seater shuttle bus is proposed to transport the majority of the workforce between the site and nearby towns"* as highlighted in above extract.

The Traffic Impact Assessment then goes on to advise *"The peak hour for construction would occur at the start and end of the day when the workforce are transported to the site. The majority of the workforce typically arrive on-site between 6:00am and 7:00am."*

Table 3: Traffic Generation During Construction Periods notes a Peak Hour (vehicles per hour) for the Shuttle Bus as 4 movements.

Table 3: Traffic Generation During Construction Periods

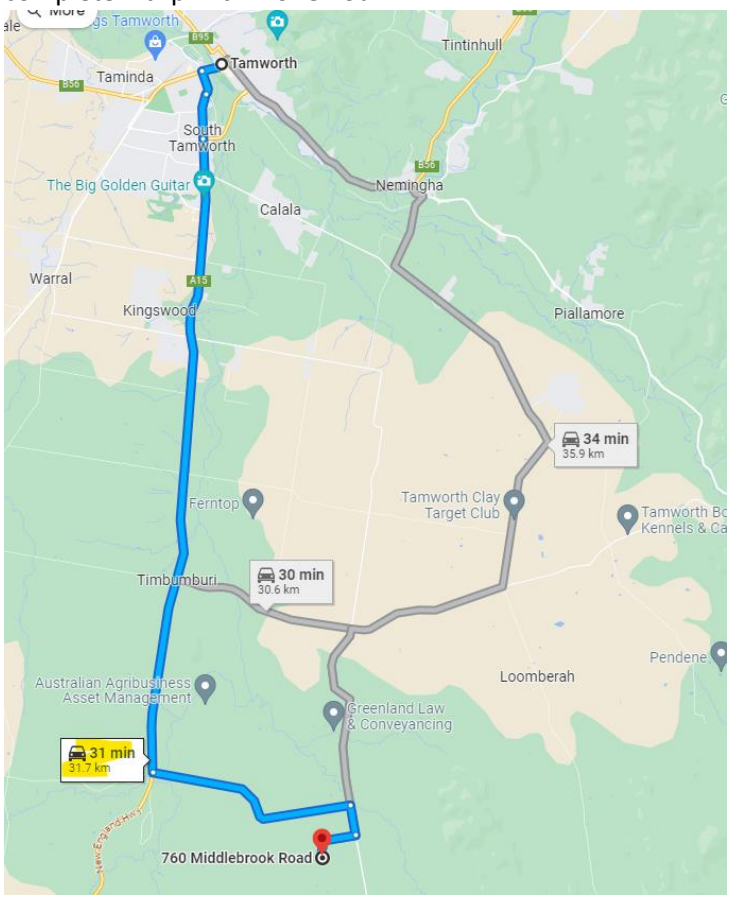
Vehicle Type	Vehicle Size	Average Vehicle Movements per Day		Peak Vehicle Movements per Day	
		Daily (vpd)	Peak Hour (vph)	Daily (vpd)	Peak Hour (vph)
Light Vehicle	Light Vehicle (car / 4WD)	40	10	86	22
Heavy Vehicle	Shuttle Bus	6	3	8	4
	MRV/HRV	8	1	16	2
	Truck and Dog	10	1	20	2
	AV	8	1	16	2
	B-Double	10	3	20	3
Total		**82**	**19**	**166**	**35**

Overall, the site is expected to generate approximately 35 vehicle movements during the morning and evening peak hours during the peak construction period, which would reduce to 19 vehicle movements over the typical construction periods.

Firstly, "*A 40 seater shuttler bus…*" (single) is not going to transport the majority of workers between Tamworth and the project all within 1 hour – between 6:00am and 7:00am.

According to Google Maps, a vehicle trip from Tamworth to 760 Middlebrook Road takes 31 minutes and is 31.7km.

Table 3 (above) notes 4 peak hour movements for the shuttle bus. A single shuttler bus cannot complete 4 return trips to Tamworth within 1 hour, so I assume a movement is in one direction, and this totals 2 return trips to Tamworth. Based on a 30 minute trip one way, it is only possible to complete 1 trip within one hour.



1 trip x 40 workers maximum = 40 workers in total transported by the Shuttle Bus in one hour to the project.

400 peak workers arriving to the site in 1 hour – 40 workers transported by the shuttle bus = 360 workers during peak hour still travelling to the project via other means. **The majority of workers would therefore travel via light vehicles.**

Table 3 notes 22 light vehicle movements during peak hour. Assuming all movements are in one direction to the project, and the light vehicles have an average of 2 workers per vehicle, this equates to 44 workers being transported by light vehicles during peak hour.

360 workers – 44 workers travelling via light vehicles = 316 workers still unaccounted for to travel to site

Given this, more realistic numbers for light vehicles during the 18-month peak construction period during each peak hour would be in the order of 300+ movements, not 22.

Therefore, the Expected Peak Hour Project Traffic Volumes on the Intersection of the New England Highway and Middlebrook Road are grossly underestimated.

The New England Highway does not have a southbound turning lane into Middlebrook Road. Given there would be in excess of 300 peak hour movements from Tamworth heading south down the New England Highway and turning left onto Middlebrook Road, the safety of this intersection needs further consideration.

Further, Middlebrook Road is unsealed, contains a single lane bridge and will see an increase of over 600 vehicle movements (both directions) per day. This needs further consideration in relation to concerns regarding road maintenance, safety, dust and noise.