



26 July 2018

SWT18/00008
SF2018/022335
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The Manager
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ellen Jones

SSD-9039 – PROPOSED SOLAR FARM, LOT 1 DP100773, LOTS 1-7 DP134511, LOT 103 DP752290, LOTS 114-116 DP752290, LOT 125 DP752290 AND LOT 132 DP752290, SAVERNAKE ROAD, MULWALA.

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 proposal for the Mulwala Solar Farm project based on the supplied documentation including the Environmental Impact Statement (EIS) dated May 2018 and the Traffic Impact Assessment (TIA) dated May 2018. From the information provided it is understood that the proposal is for the establishment and operation of an 80 MW solar photovoltaic (PV) plant and associated infrastructure on the subject site. The subject site has frontage to the Tocomwal Road, which is a classified road, and to Savernake Road, which is classed as a local road. The intersection of Savernake Road with Tocomwal Road is located within an 80 km/h speed zone.

The development will comprise of a series of solar panels (approximately 300,000) erected on the site. It is noted from the documentation that 2 options are being considered for the mounting of the panels however it is understood that each of the options have relatively comparable footprints, visual and environmental impacts. The various options for the panel structures will stand about 4 metres above ground.

It is understood that the anticipated construction period will be up to 12 months. 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 submitted documentation considers the heavy and light vehicle traffic generation for construction of the facility. The documentation does not finalise the preferred route for the delivery of components to the development site or the source of other products, such as the aggregate, water and sand. The submitted reports acknowledge the need for preparation of an appropriate Construction Traffic Management Plan. 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.

The submitted documentation indicates that access to the development site is proposed from Lambruck Lane and through the intersection of the Tocumwal Road and Savernake Road. However an access is also proposed from Tocumwal Road for the proposed Switching Yard. As the proposed development site will include internal access roadways and the terrain does not appear to represent any restrictions to access from Lambruck Lane to the switching yard it is appropriate to require that all access to the development site be via this access and deny access to the site from Tocumwal Road. This is consistent with the provisions of SEPP (Infrastructure) clause 101. The standard of the access to the site from Lambruck Lane should be consistent with Council's requirements.

It is proposed that approximately 130 construction personnel would be required on site during the peak construction period. Not all the workforce will be available within the surrounding urbanised areas of Mulwala and Yarrawonga. Given the distances required to be travelled it would be appropriate to consider options to address driver fatigue for the construction period of the development. The EIS indicates that the majority of construction staff movements will be by use of mini buses from Mulwala.

The submitted documentation claims that due to the design and orientation of the solar panels that glare and reflection from the solar farm infrastructure will have negligible influence on motorists and no adverse effect on traffic safety. Given the proposed design of the panels to follow the sun and the approach angle of Tocumwal Road from the west relative to the location of the solar farm there is potential for the development to cause distraction to the motorists on Tocumwal Road. The establishment of a visual screen, such as established plantings, to shield the development from view along Tocumwal Road, particularly on the western approach, would aid to minimise any perceived impact on distraction or glint/glare for motorists.

Roads and Maritime is mainly concerned with the provision of safe access between the subject site and the public road network and the impact of the development on the safety and efficiency of the road network. Roads and Maritime emphasises the need, particularly during the construction phase of this development, to minimise the impacts on the existing road network. As the subject site is to be accessed via the intersection with the Tocumwal Road which is located within an 80 km/h speed zone the following conditions are proposed for road safety reasons.

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):-

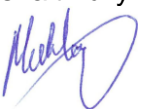
1. Prior to the commencement of construction activities a Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Roads and Maritime Services) to outline measures to manage traffic related issues associated with the development, particularly during the 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) Finalise details of haulage, including transport routes, volumes, vehicle type and length, timing, and frequency,
 - ii) Finalise details of any required road-specific mitigation measures.
 - iii) Require that all vehicular access to the site be via the approved access route.
 - 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) provide measures to suppress dust generation from the development site and the transportation route
 - vii) 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.

- viii) strategies and measures employed to manage the risks of driver fatigue and driver behaviour for construction staff.
 - ix) Measures to address adverse climatic conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the facility (e.g. fog, dust, wet weather).
 - x) procedures for informing the public where any road access will be restricted as a result of the project,
 - xi) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project,
 - xii) 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,
 - xiii) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site,
2. 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.
3. No external lighting of any infrastructure associated with the project is permitted at night that may cause distraction to road users other than low intensity security lighting.
4. A landscaped buffer (at least 5 metres in width planted with a variety of species endemic to the area and growing to a mature height ranging from 2 metres to at least 5 metres) shall be established and maintained within the subject property along the frontages of the site to the Tocomwal Road and Savernake Road to a standard to minimise distraction of the travelling public.
5. 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 deny rotation of the panels and implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.
6. Any works within the road reserve of Tocomwal 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.
7. All works associated with the project shall be at no cost to the Roads and Maritime Services.

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. **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.**

Yours faithfully



Per:
Jonathan Tasker
Acting Director
South West NSW