



25 May 2018

SWT17/00152
SF2017/260754
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The Manager
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Tim Stuckey

SSD-8825 – PROPOSED SOLAR FARM, LOT 11 DP1043022, GREGADOO ROAD, WAGGA WAGGA

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 Environmental Impact Statement dated April 2018 prepared by NGH Environmental for the Gregadoo Solar Farm. From the information provided it is understood that the proposal is for the establishment and operation of a solar photovoltaic (PV) facility and associated infrastructure on the subject site with a proposed capacity of 47 MW on the subject site.

The development site is located to the south east of Wagga Wagga and is proposed to be accessed from Boiling Down Road which is classed as a local road therefore any access driveway should be consistent with the requirements of the Wagga Wagga City Council.

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 documentation identifies the proposed haulage route for the components for the development but does not appear to address the preferred route for the delivery of or the source of other products, such as the aggregate, water and sand for construction of the development.

The development site is remote from the classified road network however due to the location of the development site to the south east of Wagga Wagga the transportation of the components for the development will be via the Sturt Highway, which is a classified road. The haulage route identifies the use of Elizabeth Ave and its intersection with the Sturt Highway. This route via Elizabeth Avenue requires all the transportation vehicles to pass through the residential area of Forest Hill. There are suitable alternative routes for the transportation of the components to the development site such as via Bakers Lane. Such routes should be further investigated and finalised as part of the Construction Traffic Management Plan.

Section 7.3.3 of the EIS lists safeguards and mitigation methods to address traffic issues which includes the preparation of a Haulage 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. Rather than adopting the route as outlined in the submitted documentation the Traffic Management Plan would provide an opportunity to better

understand and define the transportation route for delivery of the components and specialist vehicles to the development site. The use of Elizabeth Avenue for delivery of components to the development site should be denied for road safety reasons. Item TT6 of the EIS is to be amended to reflect this

Roads and Maritime is mainly concerned with the impact of the development on the safety and efficiency of the road network. Roads and Maritime emphasises the need, particularly in the construction phase of this development, to minimise the impacts on the existing road network and maintain the safety, efficiency and standard of maintenance along the existing road network and to minimise the impact and distraction to the road user.

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. A Haulage 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) Require that delivery of components to the site be via the route adopted and approved as part of the Traffic Management Plan. This route shall not include the use of Elizabeth Avenue.
 - ii) Details of traffic routes to be used by heavy and light vehicles, and any associated impacts and any road-specific mitigation measures.
 - iii) Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic,
 - iv) Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered.
 - v) 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,
 - vi) loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles,
 - vii) procedures for informing the public where any road access will be restricted as a result of the project,
 - viii) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project,
 - ix) 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,
 - x) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site,
2. All works associated with the project shall be at no cost to the Roads and Maritime Services.

Further to the above the following conditions may also be appropriate for road safety reasons

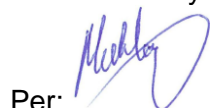
1. Prior to the commencement of construction on-site, the Proponent must undertake all works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable for use by heavy vehicles to meet any reasonable requirements that may be specified by the relevant roads authority. The design and specifications, and construction, of these works must be completed and certified by an appropriately qualified person to be to a standard to accommodate the traffic generating requirements of the project. On Classified Roads the geometric road design and pavement design must be to the satisfaction of the Roads and Maritime Services.
2. 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 implement glare mitigation measures such as establishment of a barrier (e.g. fence, advanced plantings) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.

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.

Yours faithfully



Per:
Jonathan Tasker
Acting Director
South West NSW