

20 February 2020

The Manager  
Department of Planning Industry & Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Rob Beckett

**SSD-10288 - PROPOSED CULCAIRN SOLAR FARM, CUMMINGS ROAD, CULCAIRN**

I refer to your correspondence regarding the subject Application which was referred to Transport for NSW (TfNSW), formerly Roads and Maritime Services, for assessment and comment.

From the information provided it is understood that the proposal is for the establishment and operation of a 350 MW solar photovoltaic (PV) plant and associated infrastructure on the subject site. Transport for NSW has reviewed the Environmental Impact Statement (EIS) dated January 2020 prepared by NGH Environmental and the Traffic Impact Assessment (TIA) prepared by Amber for the Culcairn Solar Farm project.

The development site does not have direct access to the classified road network. The submitted TIA proposes a site access route which includes Weeamera Road, Benambra Road and the Olympic Highway. It is proposed that all heavy vehicle traffic associated with the development will access the classified road network via the intersection of Benambra Road and the Olympic Highway. This intersection has an existing Auxiliary Right Turn (AUR) and Auxiliary Left Turn (AUL) treatment. The existing layout of the intersection is considered to be adequate for heavy vehicle traffic generated as part of this development. An alternative site access route via the Olympic Highway and Cummins Road was considered but this option was not adopted as the angle of approach and turning treatments at this location do not cater to the type of heavy vehicles required for this development.

Due to the characteristics of such a development the significant proportion of traffic generation (for both light and heavy vehicles) occurs during the construction stage with the operational phase generating limited traffic. The proposed construction period will be approximately 16-18 months. It is understood from the documentation that approximately 500 construction personnel would be required during the peak construction period which will last for 8-12 months. The submitted documentation indicates that the construction workforce is proposed to be housed within the local area including Culcairn, Holbrook, Albury, Wagga Wagga and surrounding localities. The EIS refers to the use of buses to transport workers to and from the site.

The submitted reports acknowledge that this development will require the preparation of an appropriate Construction Traffic Management Plan and Haulage Management Plan. As the proposal relies on access via the classified and local road network these plans should be finalised in consultation with the relevant road authorities, being both Transport for NSW and Council.

The development will comprise of a series of solar panels (up to 1,100,000) to be mounted on single axis tracker frames. From the documentation provided, the maximum height of the proposed mounting structures will not exceed approximately 4 metres above ground level. Given the type and scale of the proposed development and its proximity to a public road it is considered appropriate that issues relating to potential for distraction of, and for glint and glare impacts on, passing motorists be addressed.

Part of the development site is immediately adjacent to the rail corridor from Culcairn to Corowa. Transport for NSW is preparing comments regarding protection of the aforementioned Country Regional Network (CRN) assets. A supplementary response in relation to the CRN matters will be provided in due course.

Transport for NSW is mainly concerned with the impact of the development on the safety and efficiency of the road network. Transport for NSW 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 an intersection with the Olympic Highway which is located within a 100 km/h speed zone the following conditions are proposed for road safety reasons.

Transport for NSW 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. The following items shall be included in the proposed Haulage Plan (Item TT1) of Table 6.6.4 (Safeguards and mitigation measures);
  - i) Require that all vehicular access to the site be via the approved access route.
  - ii) 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. (Scheduling of deliveries)
2. The following items shall be included in the proposed Traffic Management Plan (Item TT2) of Table 6.6.4 (Safeguards and mitigation measures);
  - i) 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).
  - ii) procedures for informing the public where any road access will be restricted as a result of the project,
  - iii) 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.
3. 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 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.
4. Works associated with the development shall be at no cost to Transport for NSW

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 - TfNSW (South West Region), Maurice Morgan, phone (02) 6923 6611.

**Please forward a copy of the Notice of Determination for this Development Application to the Transport for NSW at the same time as advising the applicant.**

Yours faithfully



Per:  
Lindsay Tanner  
Director South West