



21 November 2019

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

Attention: Rob Beckett

SSD-9874 - PROPOSED WALLA WALLA SOLAR FARM, BENAMBRA ROAD, WALLA WALLA

I refer to your correspondence regarding the subject Application which was referred to the Transport for NSW for assessment and comment.

Transport for NSW has reviewed the Environmental Impact Statement (EIS) dated October 2018 prepared by NGH Environmental and the Traffic Impact Assessment (TIA) prepared by Ontoit for the Walla Walla Solar Farm project. From the information provided it is understood that the proposal is for the establishment and operation of a 300 MW solar photovoltaic (PV) plant and associated infrastructure on the subject site.

The subject site is located with has frontage to Benambra Road approximately 4km north east of Walla Walla and to the west of the Olympic Highway. Vehicular access in to the development site is proposed from Benambra Road which is a local road therefore any access driveway to the site should be consistent with the requirements of Council. Access to the site and the delivery of components to the site will rely on access from the Olympic Highway at its intersection with Benambra Road. The Olympic Highway is a classified road with a posted speed limit of 100km/h at its intersection with Benambra Road. Both the Olympic Highway and Benambra Road are approved B-Double routes.

Access to the solar farm is proposed through one access point from Benambra Road at the north-eastern corner of the project site. Schneiders Road runs between the land parcels of the development site and is proposed to be used for access between the land parcels. The current intersection of Benambra Road and the Olympic Highway provides an intersection treatment which has previously been upgraded to facilitate turning heavy vehicles and is suitable for the proposed additional turning traffic.

It is understood that the construction period will be approximately 16-20 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 stage with the operational phase generating limited traffic. The submitted documentation considers the heavy and light vehicle traffic generation for construction of the facility. The submitted 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, however it is noted from the EIS that items such as solar panels and racking systems will "most likely" be transported by road from Sydney and in some instances Melbourne.

Section 6.6.6 of the EIS lists the proposed safeguards and mitigation measures for traffic and transport related issues. The submitted reports acknowledge that this development will require the 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 Roads and Maritime Services and Council.

It is understood from the documentation that approximately 250 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 Albury, Culcairn and surrounding localities. The EIS refers to the use of buses to transport workers to and from the site.

The development will comprise of a series of solar panels (up to 900,000) 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.

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 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.

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 on the development site 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) Details of traffic volumes and routes to be used by heavy and light vehicles, 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) 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.
 - vii) The management of construction staff access to the works site is to include the provision of bus transfer to the site and strategies and measures employed to manage the risks of driver fatigue and driver behaviour.
 - viii) 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).
 - ix) procedures for informing the public where any road access will be restricted as a result of the project,
 - x) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project,
 - xi) 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,


- xii) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site,
2. The Proponent shall engage an appropriately qualified person to prepare a Road Dilapidation Report for transport routes, particularly intersections, to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority (Roads and Maritime Services and Council). This report is to address all road related infrastructure. Reports must be prepared prior to commencement of, and after completion of, construction (and decommissioning). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, must be repaired at the Proponent's cost. The applicant is accountable for this process, rather than the proposed haulage contractor. Such work shall be undertaken at a time as agreed upon between the Proponent and relevant road authorities.
 3. 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 Transport for NSW.
 4. A management plan to provide measures to suppress dust generation from the development site and the transportation route shall be prepared and implemented to the satisfaction of Council and Roads and Maritime Services.
 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 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 the Sturt Highway 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. Works associated with the development shall be at no cost to 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 Transport for NSW (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:
Lindsay Tanner
Director South West NSW