

31 January 2017

David Kitto
Executive Director Resource Assessments and Business Systems
Department of Planning & Environment
GPO Box 39
Sydney, NSW 2001
Via email: elle.donnelley@planning.nsw.gov.au
CC: tim.stuckey@planning.nsw.gov.au
diana.charteris@planning.nsw.gov.au

Dear David,

Re: Request to use Alternative Access Route re: Development Consent SSD 6604

We would like to request for the Secretary's approval to use the alternate access route, as per condition 4 of schedule 3 of Development Consent SSD 6604. A letter from Griffith City Council recommending the alternate access route is attached as Appendix 1.

1 Description of Request

This application requests Development Consent SSD 6604 Schedule 3 conditions 4 to be approved:

- All construction heavy and light vehicles to enter the sites via the Ross Road/Burley Griffin Way intersection;
- All construction heavy vehicles leave the sites via the Ross Road/Burley Griffin Way intersection; and
- All construction light vehicles leave the sites either via Ross Road/Burley Griffin Way intersection or Hamilton Road/Irrigation Way intersection.

2 Justification for the Request

Post development consent investigations of the upgrades required to the Irrigation Way/Hamilton Rd preferred access route intersection reveal:

- Safety concerns because of the configuration of the intersection and rail crossing;
- Additional costs because other upgrades are required that were not contemplated prior to the development consent; and
- Risk to the projects timeline because of the anticipated approval process for works to be carried in railway corridor land and on the level crossing.

2.1 Irrigation Way/Hamilton Rd Intersection - Safety Concerns

Post development consent investigations discovered:

- The distance between the upgraded edge of Irrigation Way and the Hamilton Rd level crossing stop sign is approximately 15 metres;
- A 19 metre vehicle egressing from Irrigation Way onto Hamilton Road and stopping at the level crossing will overhang into the proposed Auxiliary Left Turn Lane.
- A 19 metre vehicle egressing from Hamilton Rd and stopping at the intersection will overhang the rail line.

The lack of sufficient distance between the edge of Irrigation Way and the Hamilton Rd level crossing stop sign to cater for 19m construction vehicles poses a potential safety risk for vehicle users of Irrigation Way and users to the rail line.

The Ross Road/Burley Griffin Way intersection is not influenced by a rail level crossing.

2.2 Irrigation Way/Hamilton Rd Intersection – Other Upgrades - Additional Costs

Development application investigations of the upgrades required for the Irrigation Way/Hamilton Rd intersection indicated only one Auxiliary Left Turn sealed treatment within the rail corridor would be required for Irrigation Way on the western side of Hamilton Rd and the upgrade could possibly remain for future public use.

Post development consent investigations indicate:

- The level crossing will need to be widened to accommodate the turning radii of the 19m heavy vehicles;
- Another Auxiliary Left Turn sealed within the rail corridor would be required for Irrigation Way on the eastern side of Hamilton Rd;
- It is likely Transport for NSW (TfNSW) & John Holland Rail (JHR) will require any upgrades within the rail corridor and on the level crossing to be removed and the areas reinstated to their previous state;
- Because of the extent to the intersection upgrades Telstra has indicated their infrastructure e.g. cable in this area will need to be relocated;
- Because the rail line is both a freight and passenger line \$250m public liability insurance is required for work in the rail corridor and on the level crossing;
- Traffic control required for roads upgrades and removal of the road upgrade will be significant; and
- Rail authority management/supervision of road works and removal of road works within the rail corridor and on the level crossing will be significant.

The additional upgrades and works to Irrigation Way/Hamilton Rd add further cost to the project which was not anticipated during the development application investigations.

The Ross Road/Burley Griffin Way intersection upgrades will not be influenced by a rail level crossing, will not be required to be removed and Telstra infrastructure will not be required to be relocated.

2.3 Irrigation Way/Hamilton Rd intersection – Approval Timeline

Development application investigations of the estimated timeline for TfNSW approval for one Auxiliary Left Turn sealed treatment within the rail corridor at the Irrigation Way/Hamilton Rd intersection indicated it would be relatively straight forward and would not take a significant amount of time.

Post development consent investigations indicate:

- The rail approval process is more complex and requires more time than anticipated in part because approval is also required for widening of the level crossing in addition to works within the rail corridor;
- Approval for the identified upgrade works must be obtained from both Transport for NSW TfNSW and JHR. The indicative time to obtain both “approval in principal” and “full construction approval” from TfNSW and JHR is 30 to 36 weeks from the day the application/s is lodged with the relevant authority. This does not account for any unforeseen matters e.g. request for environmental assessments; and
- The Telstra approval process to relocate a cable that services the public is complex and likely to take a significant amount of time.

Because construction of the Griffith Solar Farm cannot commence until the intersection and level crossing upgrades are completed this potentially delays the project construction by seven (7) months.

Neoen Australia Griffith Solar Farm has secured funding through the Commonwealth ARENA Advancing Renewables Program – Solar PV. The ARENA funding is dependent on the Neoen Australia Griffith Solar Farm project meeting milestones conditions including the project being commissioned and operational by January 2018. To achieve this the EPC solar farm construction works must begin in February 2017.

A potential delay of seven months would significantly impact the solar farms construction commencement date and operational date.

The Ross Road/Burley Griffin Way intersection upgrades will not require TfNSW) and/or JHR approval.

3 Conditions of Consent

This application proposes to request for approval for the use of the alternate access route per condition 4 of ‘Schedule 3 – Environmental Conditions’ of Development Consent SSD 6604 as follows:

Access Route

4. If the Applicant is unable to secure access to the land in the railway corridor required to upgrade the intersection of Irrigation Way and Hamilton Road, and has demonstrated to the satisfaction of the Secretary that it has used its best endeavours to secure this access, then all vehicular traffic associated with the development shall instead travel to and from the project site via Burley Griffin Way, Ross Road, Hamilton Road and the site entry point (shown as ‘Route B’ in the figure in Appendix 2).

Road Upgrades – Alternative Access Route

6. Prior to the commencement of construction, the Applicant shall:
 - (a) upgrade the intersection of Burley Griffin Way and Ross Road to the satisfaction of RMS and Council, including a Basic Right Turn – Short and Basic Left Turn sealed

treatment in accordance with the *Austrroads Guide to Road Design* (as amended by RMS supplements); and

(b) upgrade Ross Road to the satisfaction of Council to allow two-way construction traffic, including paving and widening of the road to 8.4 metres (with the exception of the bridge located immediately south of Burley Griffin Way).

Note: The road upgrades in this condition are only required if the preferred access route is unavailable, subject to condition 4 of this consent.

4 Consultation on the Alternate Access Route

The following consultation has occurred post-consent:

- Griffith Solar Farm and Riverina Solar Farm have discussed access routes and corresponding intersections for the construction of the Solar Farms; and
- Griffith Solar Farm and Riverina Solar Farm have discussed with Griffith City Council (GCC) and Roads and Maritime Services (RMS) access routes and corresponding intersections for the construction of the solar farms.

Riverina Solar Farm will be submitting a similar request for their Development Consent.

Attached as Appendix 1 are GCC letters supporting the requested modification.

5 Conclusion

This report demonstrates that the only viable option is the alternate access route per the SSD 6604 Development Consent which remains consistent with the general nature and intentions of the approved development.

We trust that the content of this letter is sufficient for the assessment of the request, however; should you have further queries or wish to discuss any aspect, please do not hesitate to contact our office.

Yours sincerely,



Warren Woo
Project Manager,
Neoen Australia Pty. Ltd.
Tel. +61 (0)468 938 753