



TO: Development Engineer Amul Gaire

PROPERTY DETAILS: 873 Wallaces Gap Road BALLALABA NSW 2622
Lot 81 DP 755905

FILE NO'S: DA.2026.0113

SUBJECT: Referral to Development Engineer for Comments

DESCRIPTION: Construction of a solar farm, battery energy storage systems, landscaping and associated site works

REFERRAL FOR:

- ☒ Development Application Comment
- ☐ Bushfire Assessment
- ☐ Local Government Approval
- ☐ Construction Certificate

RESPONSIBLE OFFICER: Ranganathan Ravi

DATE: 25 March 2026

Additional Info

Traffic Impact Statement

The Traffic Impact Statement (TIS) submitted as part of the development application confirmed that a 26m B-Double (Articulated vehicle) will be required to deliver the goods. The B-Double truck will need to travel approximately 22km along Cooma Road and 2.8km along Wallaces Gap Road. While Cooma Road is an approved B-Double route with conditions, Wallaces Gap Road is not approved for B-Double. TIS to be updated to confirm that Wallaces Gap Road is suitable with adequate sight distance and swept path for the B-Double vehicle. Sections of Wallaces Gap Road are narrow and do not allow two-way traffic. The report is to review these constraints to confirm the adequacy of the access road for the delivery of equipment to the site without a detrimental impact on the existing traffic on Wallaces Gap Road.

Development Engineering notes that a detailed dilapidation report of Wallaces Gap Road will be required before and after construction and will be conditioned as part of the assessment

Amul Gaire (01/06/2026)

Development Engineer comment: An updated traffic report dated 19 August 2026 was submitted. Refer to the report for the detailed assessment.

Amul Gaire (27/08/2026)

Proposal

The proposed development application includes constructing and installing a solar farm and battery energy storage system (BESS) at Lot 81 DP 755905, known as 873 Wallaces Gap Road, Ballalaba. The project is proposed to occupy 14.11 hectares of the 40.2 Ha site, with an estimated development cost of \$9.57 million.

The Statement of Environmental Effects prepared by Zenith Town Planning dated 12 March 2026 seeks the following approvals as part of the development application;

- Installation of approximately 10,800 solar panels installed in rows that are around 120 metres long running east to west.
- Ancillary infrastructure including inverter station with allowance for BESS on a 12.0 metre skid alongside the inverter station.
- An additional pole at the north-western corner of the array
- A 1.8 metre high security fence with three rows of barbed wire on top to extend the total height to 2.3 metres.

The facility is expected to operate for approximately 35 years.

Sewer and Water

No potable water or sewer service is available for this property. The applicant will need to rely on its own water source. A portable toilet is proposed for installation during the construction phase.

Traffic and Access

The proposed site at 873 Wallaces Gap Road, Ballalaba, will be accessed via the existing access off Wallaces Gap Road. All construction and delivery vehicles will need to travel approximately 2.8km along Wallaces Gap Road to reach the site. Wallaces Gap Road is an un-signposted rural road with a default speed of 100km/h in accordance with TfNSW Speed Zones data. While 100km/h appears to be an upper limit due to unfavourable road conditions, locals are expected to travel at speeds above 80km/h on large sections of the road.

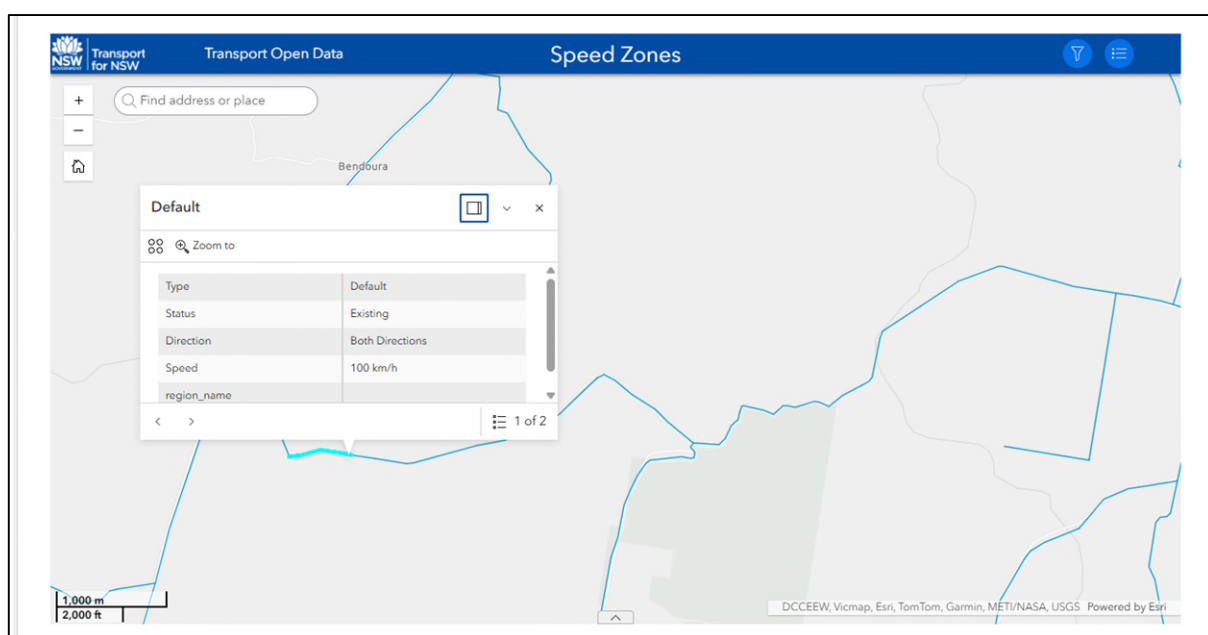


Figure 1: Wallaces Gap Road – Speed Zone

According to the Traffic and Parking Impact Statement prepared by McLaren Traffic Engineering and dated 19 August 2026, 20m articulated vehicles will deliver the solar panels and batteries to the site. Each battery container will weigh approximately 36 tonnes and be transported on a skeletal trailer. The report describes Wallaces Gap Road as 6m wide and suitable for two-way truck movements at low speeds. However, Development Engineering has several concerns about the proposal and the submitted report. The traffic impact statement has failed to identify several key issues with the proposal, as outlined below.

Wallaces Gap Road and Old Cooma Road Intersection

The submitted traffic impact statement has not considered the sight distance available at Wallaces Gap Road and Old Cooma Road.

The proposal would require eight (8) articulated vehicle trips per day and 80 construction vehicle trips per day during construction. This is a significant increase in the number of vehicles that will need to utilise the existing road network, including the intersection. Due to the existing topography of Cooma Road, the available sight distance to the right exiting Walaces Gap Road is less than 130m. This is a considerably shorter sight distance than the required Safe Intersection Sight Distance (SISD) of 296m. The current available sight distance would not be sufficient for the conservative required Stopping Sight Distance (SSD) of 225m as outlined in the Austroads Guide to Road Design Part 4A. As such, development engineering does not support the use of Wallaces Gap and Old Cooma Road intersection for additional vehicles, including articulated vehicles.

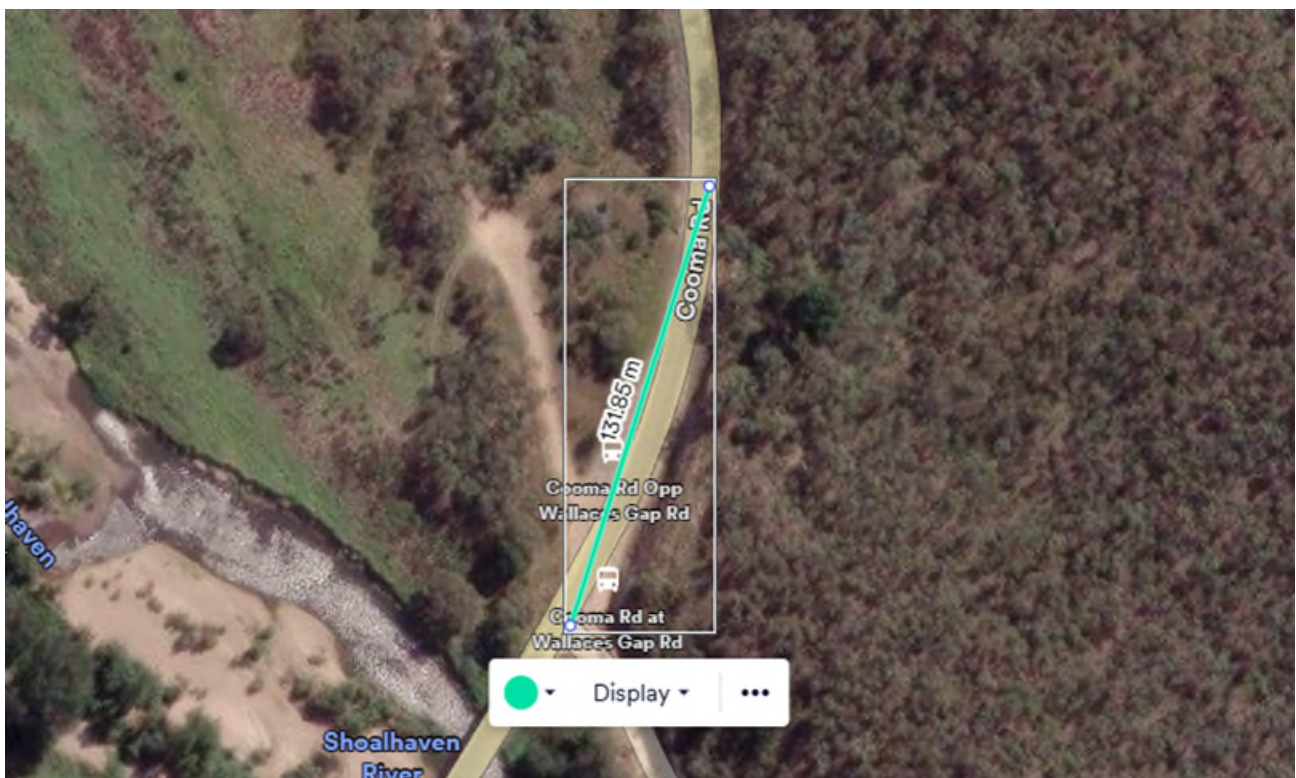


Figure 2: Intersection Cooma Road and Wallaces Gap Road – Approximate Available Sight Distance



Figure 3: Intersection Cooma Road and Wallaces Gap Road – Existing Approximate Available Sight Distance (looking North)

Wallaces Gap Road

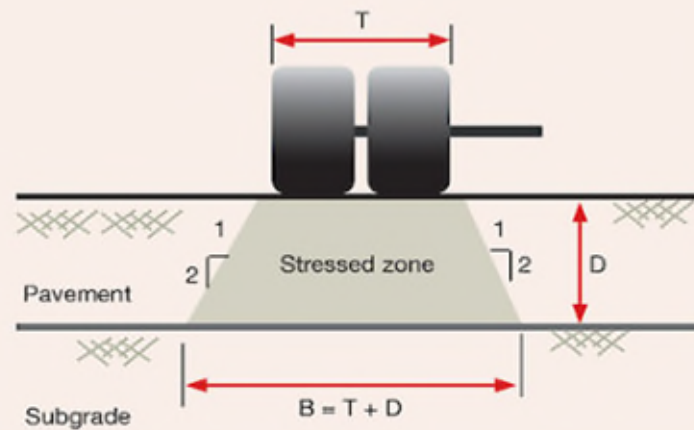
The submitted traffic report identifies Wallaces Gap Road as 6m wide and suitable for low-speed, two-way truck movements. Development Engineering notes that the road is between 4.0m and 4.5m wide, with some sections adjacent to the Shoalhaven River narrower than 4.0m. Sight distance along the first 1.3 km is also inadequate for heavy vehicles. There are effectively no suitable passing opportunities between Old Cooma Road and the site access. In several locations, even light vehicles must reverse to pass one another. The proposed construction traffic would therefore adversely affect local residents who rely on the road daily.



Figure 4: Wallaces Gap Road – Width (3.9m at this section)

Development engineering also noted during the site visit that sections of road adjacent to the Shoalhaven River have a high erosion risk. The pavement formation on the subject section is narrower, with no shoulder lane to spread the load of heavy vehicles, increasing the risk of road collapse. A detailed slope stability analysis will need to be carried out and included as part of development applications.

Idealised load distribution



The idealised load distribution is where the stress area (circle of diameter B) of the subgrade is equal to the width of the tyre(s) (T) plus the pavement depth (D)

Figure 4: Heavy Vehicle Load Distribution



Figure 4: Wallace's Gap Road – Erosion Risk Areas Where Slope Stability Analysis Required

Site Access

The submitted traffic impact statement identifies that approximately 220m of sight distance is available on both sides, exceeding Austroads requirements. However, thick vegetation, including significant trees on both sides of the proposed driveway, limits and reduces Stopping Sight Distance significantly below the required Austroads standard.

Development Engineering does not agree with the submitted TIS confirming adequate sight distance for the access.



Figure 5: Wallace's Gap Road – Reduced Sight Distance Due to Existing Vegetation on Both Sides of Road Reserve

Conclusion

Development Engineering noted several shortcomings in the proposal, including the submitted Traffic Impact Statement to support the development. As such, Development Engineering does not support the proposal for the following reasons.

- The available Safe Intersection Sight Distance (SISD) and Stopping Sight Distance (SID) at Cooma Road and Wallace's Gap Road are inadequate for the proposed development.
- The width of the Wallace's Gap Road is inadequate to support the passing of proposed heavy vehicle movement.
- The pavement formation width and eroded bank would require detailed analysis of the axle load distribution and slope stability to support the proposed laden articulated trucks.
- The access does not comply with sight distance requirements because of significant vegetation on both sides along the verges of Wallace's Gap Road.

ENGINEERING CONDITIONS

The following conditions may apply to the development:

(Strikethrough conditions not required)

<u>Solar Farm Development</u>	The construction of a solar farm, battery energy storage systems, landscaping and associated site works is not supported by Development Engineering, as satisfactory and safe access for delivery of materials has not been demonstrated.
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Engineer: Amul Gaire

Signed:



Date: 27-08-2026