



29th September 2025

Iwan Davies
Director
Energy Assessments
Department of Planning Housing and Infrastructure

Re: Richmond Valley Solar Farm SSD-41020244 - Removal of Bus Laydown Component

Dear Iwan,

I am writing regarding Richmond Valley Solar Farm SSD – 41020244 to advise of the removal of the bus laydown component of Project. This element was originally included as a recommendation in the Traffic and Transport Assessment submitted with the Environmental Impact Statement (EIS) in June 2024. It was noted in the preparation of the EIS that the existing intersection of Summerland Way and Main Camp Road was being utilised as an informal stop for school bus movements. The recommendation proposed provision of additional widening areas on the northbound and southbound departures of the Summerland Way / Main Camp Road intersection to provide bus layby / set down areas, enabling school bus pickup and drop off movements to be completed clear of the adjacent vehicle movements at the intersection.

As the design has progressed it has been determined that the inclusion of the bus laydown areas in the intersection design pose significant design and safety risks. Accordingly, the bus laydown component has been removed from the proposed upgrades to the Summerland Way/Main Camp Road intersection.

Key considerations informing this decision include:

- The current design is a non-compliant bus laydown as per Austroads guidelines.
- Safe implementation adjacent to a 100 km/h roadway would require extensive deceleration and acceleration lanes, as per Austroads standards.
- Stopping buses at the intersection introduces sight distance limitations for road users.
- School buses merging from the laydown area onto Summerland Way pose a safety hazard due to the high-speed nature of the road.
- Pedestrian crossings would need to be assessed and potentially introduced to accommodate safe pedestrian movement across Summerland Way.

Sincerely,

Siobhan Threlfall
Development Manager - Richmond Valley Solar Farm
Ark Energy
E: siobhan.threlfall@arkenergy.com.au