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Hay Shire Council Submission

Yanco Delta Wind Farm –SSD – 41743746 – MOD 2

Revised Traffic and Transport Impact Assessment

Proponent: Origin Energy

Hay Shire Council has reviewed the Revised Traffic and Transport Impact Assessment (TTIA) prepared by Aurecon (January 2026) supporting the proposed modification to the Yanco Delta Wind Farm.

Council notes that the report provides a reasonable assessment of local construction traffic impacts. However, several matters require clarification and further assessment, particularly in relation to the Oversize Overmass (OSOM) transport route and cumulative impacts.

Council's comments focus on the OSOM route on the Sturt Highway corridor which will directly impact the community of Hay. Additional comments are provided regarding construction traffic volumes, and cumulative impacts across the regional road network.

1. Study Area and Traffic Data

Council notes that the Traffic Impact Assessment focuses primarily on construction workforce traffic and local heavy vehicle movements near the project site, with limited assessment of the broader OSOM haulage corridor from the Port of Adelaide to the project area.

While the report identifies the proposed route and potential pinch points, it does not undertake a corridor-level assessment of traffic impacts along the Sturt Highway, including movements through Hay.

Given the scale of turbine transport required and the reliance on the Sturt Highway as a key interstate freight corridor, Council considers that a more comprehensive assessment of the regional OSOM transport route is warranted.

This should include consideration of cumulative OSOM movements associated with other renewable energy developments within the South West Renewable Energy Zone. Council notes that no traffic data appears to have been collected on the Sturt Highway west of Darlington Point, despite this corridor forming the primary freight route from South Australia through Hay to Sydney. Council does not consider the potential impacts on freight operations, safety and road infrastructure along the corridor have been adequately assessed

and does not agree with the assessment that no road safety impacts are anticipated as a result of the construction and operation of the Project

Given the quantum of OSOM movements proposed to originate from the Port of Adelaide, this section of the Sturt Highway is critical to understanding the regional impacts of the development.

Council requests that additional traffic data collection and analysis be undertaken on the Sturt Highway west of Darlington Point, including heavy vehicle percentages and freight movements and additional data should be included in a Transport Management Strategy (OSOM) as a condition of consent.

2. Construction Workforce and Traffic

Council notes that while the report provides a detailed breakdown of Oversize Overmass (OSOM) movements associated with turbine components, it does not provide an equivalent analysis of general construction freight traffic. The TIA identifies that 11% (Section 5.3.3) of all construction traffic associated with workforce transport, quarry and raw materials, water cartage and waste removal are likely to approach the project area from the South, therefore utilising both State and local roads within the Hay Local Government Area. In the absence of a detailed breakdown of heavy vehicle movements by activity and route the potential combined impacts of heavy vehicle traffic on road capacity, safety and infrastructure across the region, Council does not believe the impacts on the regional road network have been adequately considered. These vehicle types typically represent the highest volume (approx. 73% during peak construction, Section 5.3.1) and most significant source of pavement deterioration during construction.

Council notes that the development of a Construction Traffic Management Plan (CTMP) will be critical to managing impacts and requests the CTMP (TT1) include:

- *A detailed breakdown of heavy vehicle movements associated with construction activities including quarry and raw materials, water cartage, waste removal and equipment delivery*
- *Identification of construction traffic routes, including vehicles (type and volume) approaching the project from the south and west, utilising both State and local roads within Hay Local Government Area.*

The CTMP must be prepared in consultation with, and with the agreement of, all affected councils.

Council requests that Hay Shire Council be specifically identified as an affected council and therefore be included as a required consultation authority, with its agreement obtained in the preparation and implementation of the Plan.

3. Oversize Overmass (OSOM) Movements

The modification proposes that a significant proportion of Oversize Overmass (OSOM) turbine components be transported via the Port of Adelaide, with vehicles travelling east along the Sturt Highway before reaching the project area. This represents a notable change from earlier transport assumptions and has direct implications for the Hay LGA, as the Sturt Highway is the primary Adelaide – Sydney freight corridor passing through Hay. As a result, OSOM vehicles transporting large turbine components will travel through the Hay LGA and impact existing interstate freight, agricultural transport, tourism and local traffic. Given the scale, dimensions and operational requirements of these loads, Council considers that the increased use of the Sturt Highway corridor through Hay has the potential to impact road operations, safety and infrastructure within the LGA and therefore warrants detailed assessment and coordination with Hay Shire Council as the relevant local authority. Council notes that the width and weight of these loads present the primary risk to the road network, particularly along the Sturt Highway corridor.

Council also notes that the TTIA references National Heavy Vehicle Regulator but it does not fully reflect the practical approval process or the role of local councils as road authorities.

Council requests that a Transport Management Strategy be prepared in consultation with Hay Shire Council, with Hay Shire Council identified as a relevant road authority for consultation (TT10) , to ensure that critical transport and traffic impacts are appropriately assessed and managed as it relates to TT5-10.

Council requests that the role of local councils, to impose road protection and safety conditions is explicitly outlined in the Transport Management Strategy (OSOM) as a condition of consent.

4. Sturt Highway Intersection Impacts

The TTIA includes OSOM turn path assessments for several intersections along the Sturt Highway corridor including the roundabout located at the intersection of the Cobb and Sturt Highways in Hay (Pinch point OS_HSC_01).

Council notes that the turn path modelling shown in Figure 5-26 appears generally reasonable. However, the report states that recent pavement works at the intersection, including the provision of a paved perimeter, remove the need for additional hardstand. Council does not agree with this conclusion, as the existing pavement is not designed to accommodate the loadings associated with turbine transport and pavement strengthening will likely be required.

Council requests a detailed plan for the delivery of appropriate works to enable the movement of OSOM through the roundabout in the TMS.

Council also request that the no vegetation be removed from the roundabout and that remediation work includes the delivery of legacy landscaping of the intersection.

5. Cumulative Impacts

The TTIA asserts:

“The increase in traffic volumes due to the additional construction traffic of the peak construction traffic workforce is not expected to notably alter the performance on the key surrounding roads and will not cause the roads to exceed their capacity.” (p 135)”and

The increase in traffic volumes due to the additional construction traffic of the peak construction traffic workforce is not expected to notably alter the performance on the key surrounding roads and will not cause the roads to exceed their capacity.” (p 136)

Given the 13 renewable energy projects identified in the TIA (including transmission) within the SW REZ footprint, it is reasonable to assume there will be cumulative impacts with the construction of the Yanco Delta Wind Farm and as such more detail is required to adequately deliver a cumulative impact assessment.

Council notes that the cumulative impact assessment is largely qualitative and does not quantify the combined impacts of construction workforce traffic, heavy vehicle freight or (OSOM) transport where construction periods for multiple projects may overlap.

The report also notes that traffic volumes for neighbouring projects are not available and therefore a cumulative assessment could not be undertaken. While Council acknowledges this limitation, the absence of quantitative data reinforces the need for a more robust cumulative framework to be developed as further project information becomes available.

Council requests that Origin identify cumulative impacts and how they will be addressed through a project-specific CTMP in consultation with relevant road authorities, including Hay Shire Council and Transport for NSW.

Council requests that the cumulative impact section include a mechanism for coordinating traffic management across projects, particularly where multiple developments may be constructed within similar timeframes. This should include clear cross-referencing to the preparation of Construction Traffic Management Plans and Transport Management Strategies to ensure that cumulative impacts associated with construction workforce traffic, heavy vehicle freight and OSOM transport are appropriately managed.

At a minimum this should include, those projects that have been delivered Access Rights under the SW REZ Access Rights Tender and transmission line infrastructure.

Given the volume of heavy vehicle movements, the size of turbine transport loads and the size of OSOM vehicles, Council considers that these movements have the potential to affect normal business-as-usual (BAU) traffic conditions and road safety on both State and local

roads. The cumulative assessment should therefore evaluate the combined impacts on road performance and safety across the region's road network.

Di Webb

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