



5 June 2020

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

Attention: Tatsiana Bandaruk

SSD-6693 MODIFICATION – PROPOSED RYE PARK WIND FARM

I refer to your correspondence regarding the subject Application which was referred to Transport for NSW (TfNSW), formerly Roads and Maritime Services, for assessment and comment.

The application for modification of the proposal is supported by Rye Park Wind Farm Modification application Report dated April 2020 prepared by Tilt Renewables and Traffic Impact Assessment (TIA) prepared by SMEC dated April 2020. From the information provided it is understood the proposed modifications being as part of the application to modify include:

- Removal of 12 wind turbines to reduce the Project to a maximum of 80 wind turbines;
- Increase to the wind turbine envelope to a maximum tip height of 200m to enable the use of newer and more efficient wind turbine models;
- Revisions to the Development Corridor to accommodate revised Indicative Development Footprints including the reduced wind turbine numbers, optimised design assumptions including changes to the wind turbine foundations and hardstands, internal access tracks, 33 kV connection infrastructure, collector substations, transmission line and connection in infrastructure, and supporting infrastructure. Optimisation of other infrastructure, including operation and maintenance facilities, construction compounds, and temporary concrete batch plants; and
- Selection of the Preferred Transport Route for heavy and over-dimensional vehicles. Several options for the transportation of heavy and over-dimensional vehicles from port facilities are under consideration.

The modified proposal is for a reduced number of wind turbine structures. However the revised documentation indicates that the modified project represents a 119% increase in traffic from the 2016 TIA, from a one-way heavy vehicle volume of 15,055 to 32,986. The TIA claims that this significant increase in traffic volumes is due to the difference in the assumptions used to estimate construction traffic in the previous TIA and the revised TIA.

The submitted documentation identifies and documents the preferred route for the transportation of the large components on the road network to the development site from Boorowa via Rye Park Road. However the submitted documentation does not appear to include a full assessment of the impact of the transportation route along the classified road network, particularly the Lachlan Valley Way, to travel from the Ports to Boorowa.

The documentation submitted with the previous referrals identified the proposed haulage route for the components of the wind turbines and ancillary structures as being along the Hume Highway exiting the highway at its intersection with Jerrawa Road and the western intersection with the Yass Valley Way. A secondary route via the Hume Highway onto the Lachlan Valley Way was also identified. The revised proposal now appears to endorse the use of Lachlan Valley Way as the primary route.

Previously the approved over-dimensional route was from Port Kembla to the site via the Hume Highway and Lachlan Valley highway. The proposed modification introduces the potential for the haulage of the various components from the Port of Newcastle. The TIA identifies that the delivery of turbine components has been considered from two ports, Port Kembla and the Port of Newcastle. However the TIA indicates that the route(s) will be finalised subject to the selection of a final turbine and contract award. The TIA also indicates that an alternative route from the Port of Newcastle via Dubbo is also being considered. TfNSW notes that at this stage the final route is still to be adopted.

Condition 27 schedule 3 of the current development consent for the project refers to upgrades to the local road network. Section 4.4 of the modification report addresses the "Preferred Transport Route" and refers to consultation with the Hilltops, Yass Valley and Upper Lachlan Shire Council. There is no evidence provided of similar discussions with TfNSW, or the former Roads and Maritime Services in relation to the classified road network. Section 6.3.4 of the report dated April 2020 lists a number of targeted meetings with several Government agencies. Roads and Maritime Services/Transport for NSW is not included in this listing.

Appendix G.7 states "several modifications to RMS managed roads (and intersections) will need to be implemented if components are to be delivered from the Port of Newcastle and/or Port Kembla. These upgrades will be addressed by the proponent and relevant authorities once the delivery route is finalised. Prior to the commencement of any construction activities, consultation will be undertaken with RMS and Council to develop a Traffic Management Plan to manage traffic impacts of over-dimensional vehicles. It appears that the proponent intends that these routes will be detailed in the project Traffic Management Plan and will be subject to approval of over-dimensional vehicle permits via the Heavy Vehicle National Law.

Section 6.3 of the TIA states that the impacts of heavy vehicles on classified roads are expected, and will be addressed in a Traffic Management Plan once the route has been finalised. When the transportation route from the ports is finalised further discussion with TfNSW will be required prior to the transportation of any material from either port to allow for the full assessment of the adopted route and any works required to the classified road network. To allow for an informed assessment of the impact, particularly through the larger urbanised areas, a clear understanding of the final route, and the logistics and timing for the movement of the large components is required.

The TIA also identifies that the project will need to start discussions with government authorities at least 18 months prior to turbine transport to understand if the project would conflict with any upcoming roadworks. Once a TMP has been approved for the transport of the turbines, then the exact movement dates need to be communicated with transport NSW to make all road stakeholders aware of the movements.

The TMP will need to be developed in consultation with and agreed to by, the relevant road authority. Any need for road works or alterations to the classified road network particularly intersections, will need consultation with TfNSW and addressed in the TMP. The construction of any approved works will need to be completed prior to the transportation of any large components to the site. Appendix D: Statement of Commitments item 15 states "Road upgrades will be undertaken along the Preferred Transport Route". TfNSW notes that this statement does not refer only to the local road network. As per the recommendations in the route survey report, in addition

to upgrades on local roads, several modifications to RMS managed roads (and intersections) will need to be implemented if components are to be delivered from either port

Any necessary works or alterations to the classified road network may require the preparation and signing of a Works Authorisation Deed between the developer and TfNSW for the works. Any works or alterations to the classified road network or any associated infrastructure shall be to the satisfaction of Transport for NSW. All required works to and reconstruction to reinstate the networks shall be at full cost to the development.

Whilst transportation of the large components for the construction of the wind turbines and electrical transmission infrastructure present issues, its the frequency and volumes of the smaller construction vehicles, such as cement and gravel trucks, that can represent significant issues for the road network and therefore need to be addressed. The source and transportation route for such materials has not been provided. These issues need to be finalised to allow for the proper assessment of the impacts on the road network. The supporting reports for the modification indicates that there is no on-site quarry and all that materials will be transported to the site. Further detail regarding this and a Traffic Management Plan is required to be submitted for consideration. This plan should be prepared in consultation with the relevant road authorities (Council and TfNSW). Where road safety concerns are identified at a specific location along the haulage route/s, the TIA may be supported by a targeted Road Safety Audit undertaken by suitably qualified persons.

Section 7 of the TIA identifies the recommendations and mitigation measures. Mitigation measures will need to be incorporated into a Traffic Management Plan for the project and developed in consultation with TfNSW and relevant Councils to ensure that applicable safety standards are achieved and disruption to traffic is minimised. The NSW Planning Assessment Commission report of May 2017 prepared in relation to the initial proposal noted that the final road upgrade works would be subject to further detailed assessment and design prior to the implementation of the works.

From the submitted documentation it is evident that the proponent is relying on the submission of a Traffic Management Plan to be prepared at a later date to further address the traffic and transport related issues for the transportation of the large windfarm components to the development site. TfNSW agrees that further documentation such as the Traffic Management Plan should be prepared when the selected Port and transportation routes are finalised and the contractor is appointed. The appointed haulage contractor should be involved in the preparation of the TMP. TfNSW supports this as the submission and assessment of the TMP will allow for focused assessment and discussions regarding the final route.

Based on the documentation provided and the lack of certainty in relation to the proposed transportation route and traffic issues TfNSW cannot provide a detailed assessment of the impact of the proposed development on the classified road network. Notwithstanding this, in consideration of the previous application no objection was raised to the development proposal subject to suggested conditions. These conditions remain relevant to the current proposal. Should the development be determined based on the documentation provided the following should be included as conditions of consent (if approved):-

1. 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 delivery and construction of the turbines or ancillary structures, any construction or excavated materials, any machinery and personnel involved in the construction or decommissioning process. The plan shall detail the potential impacts associated with the development, the measures to be implemented, and the procedures to monitor and ensure compliance. This plan shall address, but not necessarily be limited to;

- i) Details of traffic routes to be used by heavy vehicles associated with the project, and any associated impacts and any required changes to the existing road environment along the proposed routes such as intersection upgrade, road widening, temporary street closures, removal and replacement of road infrastructure, etc required in order for the necessary materials and machinery to be delivered to site.
 - ii) Details of measures to be employed to ensure safety of road users and minimise potential conflict with haulage vehicles such as necessary route or time restrictions for oversized vehicles, use of traffic diversions, changes to speed zones, potential extended delay periods for motorists due to haulage vehicles etc,
 - iii) Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered.
 - iv) The management and coordination of the movement of construction and workers vehicles to the site and to limit disruption to other motorists, emergency vehicles and school bus timetables,
 - v) Scheduling of heavy vehicles movement to deny the need for access through school zones during school zone operating times
 - vi) Scheduling of haulage vehicle movement to minimise convoy length or platoons,
 - vii) loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles,
 - viii) procedures for informing the public where any road access will be restricted as a result of the project,
 - ix) Details of measures to be employed to ensure traffic volumes, acoustic and amenity impacts along the haulage routes is minimised,
 - x) the provision of hard stand areas for parking of transport vehicles in the case that unsealed sections of road are closed due to adverse weather or to allow for loads to be disassembled for transportation along the remainder of the route. This is not permitted in heavy vehicle rest areas, and
 - xi) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project.
2. The detailed traffic and transport planning for the project is required to involve the appointed transport contractor and is to be undertaken in conjunction with Transport for NSW and the Councils.
 3. The Proponent must engage an appropriately qualified person to prepare a Road Dilapidation Report for all road routes to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority. This report is to address all road related infrastructure. Reports must be prepared prior 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. Such work shall be undertaken at a time as agreed upon between the Proponent and relevant road authorities.

The Proponent shall commit to restore all relevant roads to a state, described in the original Road Dilapidation Report where the dilapidation is attributable to construction traffic. The cost of any restorative work described in the subsequent Report or recommended by the relevant road authorities after review of the subsequent Report, shall be funded by the Proponent. The applicant is accountable for this process, rather than the proposed haulage contractor. Such work shall be undertaken at a time as agreed to by the relevant road authorities.

4. A full and independent risk analysis and inspection of the transport route will be required to be undertaken by an appropriately qualified person and a copy provided to the relevant road authority. Further analysis and reporting to assess possible damage to, and repair of the route will be required on a regular basis.

5. Prior to the commencement of construction, 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.
6. Any disturbances to the road infrastructure within the road reserve of a classified road are to be reinstated to pre-existing or better condition. This includes any impact on the road pavement, culverts, bridges, causeways, stock grids, signage, drainages structures traffic signals and traffic islands.
7. No external lighting at night of any infrastructure associated with the project including wind turbine generators that may cause distraction to road users is permitted other than low intensity security lighting.
8. Vegetation must be cleared and maintained for the duration of construction to provide safe intersection sight distance in accordance with the Austroads Guide to Road Design at intersections along the haulage routes and proposed access points to private property in all directions.
9. All works associated with the project shall be at no cost to the Transport for NSW or the relevant road authority. The proponent must, prior to construction of any works within the road reserve of a classified road, liaise with the Transport for NSW to determine whether a Works Authorisation Deed is required.

It is requested that the applicant be advised of the following;

- The conditions of development consent do not guarantee consent from Transport for NSW to specific road work, traffic control facilities and other structures and works on the classified road network. The developer is required to obtain approval under Section 138 from Council with concurrence from Roads and Maritime Services for any works within the road reserve of a Classified Road prior to the commencement of any work.
- Prior to the commencement of any work within the classified road reserve, the Proponent may require a Road Occupancy Licence from Roads and Maritime Services. The application must be accompanied by a Traffic Management Plan (TMP) prepared by a person who is certified to prepare Traffic Control Plans.
- All arrangements for the traffic control on classified roads are to be in accordance with the publication *Traffic Control at Work Sites*. Where any works are required on or adjacent to a public road a Traffic Control Plan providing details of all warning signs, lights, barriers, etc. to be provided and maintained in accordance with AS 1742 "Manual of Uniform Traffic control devices" and the *Traffic Control at Work Sites* Guideline;
- A formal agreement in the form of a Works Authorisation Deed (WAD) may be required between the developer and Transport for NSW should the development require works on Classified Roads such as the Hume highway or Lachlan Valley Way.

- Any work undertaken on the Hume Highway or Lachlan Valley Way must be undertaken by a qualified contractor that has been approved by the RMS. A list of pre-qualified contractors may be found on the website, currently located at:
www.rta.nsw.gov.au/doingbusinesswithus/tenders/prequalifiedcontractors.html
- The requirements outlined in the Publication “Operating Conditions: Specific permits for oversize and over mass vehicles and loads” are to be followed. This publication is available online at: <http://www.rta.nsw.gov.au/heavyvehicles/oversizeovermass.html>. Where required, the applicant is required to obtain permits for any oversized and over-mass load from the Special Permits Unit.

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, TfNSW (South West Region), Maurice Morgan, phone (02) 6923 6611.

Please forward a copy of the Notice of Determination for this Development Application to the Land Use -TfNSW at the same time as advising the applicant.

Yours faithfully



Per:
Lindsay Tanner
Director South West