

Energy Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Natasha Homsey

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SSD-10461: Valley of the Winds, Warrumbungle Shire Council

3 August 2022

Dear Natasha,

Thank you for referring the abovementioned development application (DA) via the NSW Major Projects Portal on 19 May 2022 inviting comment from Transport for NSW (TfNSW). I apologise for the delay in my reply.

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and integration of land use and transport.

The Golden Highway (HW27) is a classified (State) road and Black Stump Way (MR55) is a classified (Regional) road. Council is the roads authority for these roads and other public roads in the area, in accordance with Section 7 of the *Roads Act 1993* (Roads Act).

The proposal seeks consent for the construction, operation and decommissioning of 148 wind turbines across three locational clusters known as: *Mount Hope* (76 turbines), *Girragulang Road* (51 turbines) and *Leadville* (21 turbines). Ancillary infrastructure includes on-site battery energy storage system with capacity of 320MW / 640MWh, permanent operation and maintenance facilities, internal access roads, "potential" on-site construction workforce accommodation, construction compounds and laydown areas, concrete batching plants and quarry sites for construction material. Construction is anticipated to commence in 2023 and last between 24-48 months.

The application has nominated the Oversize-Overmass (OSOM) haulage route to transport the turbine components as originating from the Port of Newcastle via Industrial Drive, Maitland Road, John Renshaw Drive, Hunter Expressway, New England Highway, and the Golden Highway to site. To accommodate the OSOM movements for the design vehicle (i.e. for 90m blade transportation), the proponent has nominated several intersection upgrades along the route, including the following classified road intersections:

- Golden Highway (State rd) / Black Stump Way (Regional rd), Leadville
- Golden Highway (State rd) / Leadville Access Road (stock route), Leadville (*x2 options*)
- Golden Highway (State rd) / Short Street (aka Turee Street), Uarbry
- Black Stump Way (Regional Rd) / Mount Hope Access Road (local rd), Coolah

In addition, should either of the two options for the Golden Highway / Leadville Access Roads not be suitable, an alternative access is proposed at:

- Golden Highway (State rd) / Sir Ivan Dougherty Drive (local rd), Leadville.

The road works associated with the abovementioned intersection upgrade works are limited to accommodating the swept path movement for the maximum OSOM vehicle length and are not proposed to be upgraded to accommodate the maximum construction traffic volumes.

TfNSW has reviewed the documentation including (but not limited to) the *Traffic Impact Assessment* (TIA), prepared

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Transport for NSW

by SCT Consulting and dated 25 February 2022, and is not satisfied that the subject application adequately addresses the impacts of the traffic generated by the development on the classified road network, in particular, at the intersections of the classified road network. Accordingly, TfNSW requests that the following information be provided for further consideration:

- The TIA includes a SIDRA analysis of affected intersections purporting to address the peak construction traffic volumes. A copy of the electronic analysis is to be provided for review for TfNSW to ascertain the inputs used to generate the outputs (in particular, consideration of 'Large Trucks' consistent with the June 2021 traffic count data) and final conclusions of the TIA. Should the analysis include changes to software defaults, justification should be provided.
- Reconsideration of the proposed minimum BAR/BAL intersection treatments along the Golden Highway, noting the high percentage of heavy vehicle traffic on the major freight route and the high-speed limit (i.e. 85th percentile is likely to be higher on the rural road than the signposted speed). The TIA shows that right-turns associated with AM peak construction traffic at the Golden Highway / Leadville Access (both access locations for Leadville cluster) and Golden Highway / Short Street (Girragulang cluster) are considerably greater than existing traffic movements.
- An amended OSOM route assessment inclusive of pinch points between Port of Newcastle and the Golden Highway, particularly through Jerrys Plains, and across the Denman Bridge. Navigation around the S-bend of the Golden Highway through Jerrys Plains has not been identified. Furthermore, it is noted in the TIA that the bridge presents vertical and horizontal limitations however a viable alternative route has not been nominated. It is requested that further investigations be undertaken to understand the bridge limitations based on transportation of the proposed 90m blade or an alternative route be nominated and assessed.
- An environmental assessment of the proposed road work construction at each intersection affected by the OSOM intersections (DPE's consideration). TfNSW highlights that in determining the application under Part 4 of the *Environmental Planning & Assessment Act, 1979* it is the consent authority's responsibility to consider the environmental impacts of any road works which are ancillary to the development, such as (inter alia) removal of trees, relocation of utilities, stormwater management, etc. It is noted that one of the two options for Leadville Site access via the Golden Highway is positioned over multiple drainage culverts and a local access. Furthermore, the swept path of the Girragulang Site access appears to require removal of several trees at Short Street and further along the local road network.
- The proposal seeks approval for a "potential" worker camp to justify lower construction peak traffic however the additional construction traffic required for the proposed on-site accommodation has not been provided. The traffic study needs to include an assessment of the worst-case scenario for construction traffic generation and proposed measures to be employed that mitigate the risks of these additional movements on the public road network. Details of additional haulage and OSOM movements associated with on-site accommodate should be considered in a revised analysis of the worst-case scenario.

I trust this information is of assistance. TfNSW looks forward to reviewing the Response to Submissions (RtS) addressing the above-mentioned matters. If you wish to discuss this matter further, please contact Kylie-Anne Pont on ph. 0481-068-175.

Yours faithfully,



Andrew McIntyre
Manager Development Services
West Region | Community and Place
Regional and Outer Metropolitan