

5 June 2024

TfNSW reference: WST24/00173/001 | SF2024/088228  
Your reference: SSD-50629707



Department of Planning, Housing & Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

**Attention: Kurtis Wathen**

**SSD-50629707 – The Plains Wind Farm – Various Lots off Cobb Highway, 15km south of Hay, Hay Shire Local Government Area**

Dear Kurtis,

Transport for NSW (TfNSW) is responding to and providing a submission in relation to the EIS Exhibition for The Plains Wind Farm which was referred on 2 May 2024.

TfNSW has reviewed the information and is unable to properly assess possible impacts on the state transport network, assets and its users. Details of **additional required information** are set out in **Attachment 1**.

On request, TfNSW can participate in a meeting with DPHI and the Applicant to further discuss the information in Attachment 1.

If you have any questions, please contact Tim Mitchell, Development Services Case Officer, on 1300 019 680 or email [development.renewables@transport.nsw.gov.au](mailto:development.renewables@transport.nsw.gov.au).

Yours faithfully,

A handwritten signature in black ink, appearing to read "Alexandra Power".

**Alexandra Power**  
Team Leader Development Services Renewables  
Community & Place  
Regional and Outer Metropolitan

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OFFICIAL

**SSD-50629707 – The Plains Wind Farm – Various Lots off Cobb Highway, 15km south of Hay, Hay Shire Local Government Area**

This attachment relates to TfNSW's response dated 5 June 2024 reference WST24/00173/001.

**Context**

TfNSW understands the subject application:

- Proposes the development of a wind farm with 188 wind turbines.
- The affected classified State roads are Cobb Highway and Barrier Highway.

**State classified road access point and key intersections for TPWF:**

- Cobb Highway/ West Burrabogie Road – proposed for light, heavy vehicles and OSOMs
- Cobb Highway/ Site access point A - proposed for light, heavy vehicles and OSOMs
- Cobb Highway/ Site access point B - proposed for light, heavy vehicles and OSOMs
- Cobb Highway/ Site access point D - proposed for light, heavy vehicles and OSOMs
- Site access point C will be off West Barrabogie Road (local road)

**Oversize and Overmass Route(s) from the Port of Adelaide:**

- From Port Adelaide and enter NSW on Barrier Highway. Route to follow Barrier Hwy, proposed Broken Hill bypass (including new road, Gaffney Street, Silver City Hwy, Crystal St, Sturt St, Chettle St), Barrier Hwy, Cobb Hwy

**Largest OSOM components and laden dimensions**

Base Towers:

- Component size: 10.0l x 6.3w X 6.3h x 110t
- Overall dimensions: 39.1l x 6.3w x 6.7h x 192t

Blades:

- Component size: 86.9l x 4.8w X 3.7h x 32t
- Overall dimensions: 97.4l x 4.8w x 4.7h x 86t

Transformer:

- No sizing information is available at present.

**Design vehicle for heavy vehicles an OSOM**

- B-double is the design vehicle for the strategic design of the intersections.

Identified light vehicle, heavy vehicle and OSOMs per day based on the worst-case scenario presented in the TIA:

- 700 employees during peak of construction traffic. 350 in onsite workforce accommodation and 350 from surrounding town. Generation have been based 2 person per car for the 350 workers

from surrounding towns, equating to 175 light vehicles and 350 trips per day, 350 heavy vehicle per day and 5 OSOM per day.

### **Additional required information | TfNSW comments**

TfNSW requests the following additional information to continue the assessment of The Plains Wind Farm:

#### **OSOM route study**

1. The existing rest areas are required to remain available for light and heavy vehicles, in addition to the OSOMs vehicles. The OSOM route assessment must be updated to identify the parked high risk OSOMs and the available parking for light and heavy vehicles required to access the rest areas.
2. Swept paths are required to be provided that demonstrate that the OSOM design vehicle for each rest area can ingress and egress the rest area.
3. The OSOM route assessment is required to be revised to include locations for pull over bays, laybys and emergency stopping along the route and the types of high risk OSOM that will be utilising each rest area, pull over and layby location.
4. In relation to the proposed OSOM bypass around Broken Hill on the Barrier Highway, the following matters need to be addressed within the TIA and in the OSOM route study:
  - No information has been provided regarding how the OSOM bypass will be prohibited from being used by other forms of traffic on the Barrier Highway. If the light and heavy vehicles are not intended to be prohibited from using the Broken Hill bypass then a turn warrant assessment, safe intersection sight distance assessment, strategic concept designs with the outcome of the intersection treatments and swept paths for the heavy vehicle design vehicle must be provided in all turn directions identifying that the arc of the heavy vehicle can occur concurrently.
  - Strategic concept designs are required to be provided that demonstrate compliance with Austroads and TfNSW requirements. The strategic concept designs must be accompanied by swept paths for the largest design vehicle.
  - The throat of each intersection required for the Broken Hill bypass must be sealed for a portion past the intersection to prevent dirt and tracking onto the Barrier Highway.
  - If the Broken Hill bypass is only required during construction, then will the Broken Hill bypass be removed post construction? If it is proposed to be removed how will blades be delivered to the site post-construction if there are any blades required to be replaced.
  - Evidence of landowners consent for the route through the private land will need to be provided to the consent authority.

*Note: the turn warrant assessments are required to be based on the background traffic volumes at the AM/PM network peak, including growth and any traffic volumes associated with the project.*

5. Strategic concept designs will need to be provided for any proposed widening locations on the state classified network that are required to accommodate the high risk OSOM vehicles. The hardstands will need to be sealed and pavement to be to the standards of the adjacent road.
6. Confirm what the laden height dimension is for the blades, the route assessment identifies two different heights 4.7m (pg11) while design drawing states laden height of 5.61m (pg12).

### **Total traffic generation**

7. The TIA prepared by Amber Consulting for The Plains Solar Farm and the TIA prepared by ERM for The Plains Windfarm states the projects will not overlap in construction timeframes, however, the schedule of works for each project identifies that the projects overlap. The TIA needs to be updated to include an assessment of cumulative impacts or staggering to reflect the projects will not overlap. If applicable, the turn warrants will need to be updated to reflect the coinciding timeframes of the overlap of the projects to determine if higher order intersection treatments are required.
8. Figure 10 of the TIA shows the PM peak traffic volumes, however all the traffic leaving the site appears to be coming from West Burrabogie Road, with no volumes leaving from the other site access points. Confirm if Figure 10 is correct or update the TIA to provide additional traffic assessment of the PM peak traffic volumes egressing West Burrabogie Road onto Cobb Highway.
9. Identify traffic generation and types of vehicles required at each stage of construction inclusive of pre-construction minor activities.

### **Emergency Access to State Classified Road**

10. Must identify how the access will be managed (i.e gates) to prevent the use of the access for other vehicles associated with the development during peak of construction and operation.
11. Identify the emergency design vehicles and provide a swept path analysis identifying.
12. Provision of sufficient storage at the throat of the access to allow for the emergency vehicle to store within the access and not within the through lane or shoulder.
13. Identify compliance with SISD for the design speed (posted speed +10km/hr) and measures to achieve compliance.

### **Strategic designs**

14. Swept paths for the high risk OSOM will be required for each site access point to the site that will be required to be used for the high risk OSOM. The swept paths are required to demonstrate that the high risk OSOM can be delivered within the existing or proposed pavement and if further pavement widening is required to accommodate these movements.

### **Bridge, culvert and pavement assessments**

15. The application proposes the traffic OSOMs for transformer and BESS components. It is recommended the proponent complete a bridge and culvert assessment for the TfNSW managed structures along the route are suitable for the requested mass.  
A bridge and culvert assessment will take approx. 4 weeks to complete and is at cost to the proponent with no guarantee of being approved. The proponent can contact the TfNSW Freight Operations team at [spu@transport.nsw.gov.au](mailto:spu@transport.nsw.gov.au) to arrange the assessment process.
16. There is significant concern the Cobb Hwy pavement, and to a lesser extent the Barrier Hwy, will not be able to sustain the axle weights and number of OSOM movements and significant pavement failures may occur. Pavement investigations will be required to assess the suitability of the pavement for the high risk OSOM deliveries required for the development.  
*Note: If the bridge, culvert and pavement assessments are identified to not be suitable for the high risk OSOM loads, then alternative vehicle combinations and routes may need to be considered.*

### Temporary Workforce Accommodation

17. Two accommodation compounds will be provided to accommodate up to 350 construction workforces. One compound will be located to the north (Lot 23 DP 756797) and one to the south (Lot 23 and 24 DP 756778). No assessment undertaken for traffic volumes due to the construction of the temporary workforce accommodation. The TIA is required to assess the worst-case scenario based on the inclusion of the workforce accommodation camp, with respect to:

- The construction schedule, staging, traffic generation until the point of when the workforce would be fully accommodated at the camp.
- The traffic volumes during construction and if any parallel construction or pre-construction would be occurring in parallel.
- Identify the traffic generation of all construction traffic post full occupation of the workforce accommodation camp.
- Identify the traffic volumes associated with any pre-construction and construction works occurring in parallel to the construction and full occupation of the workforce accommodation camp.
- Assess for the full and partial (where staged) the traffic volumes, vehicle types, changes to routes, turning directions/distributions, changes to the AM/PM project peaks for the operation of the workforce accommodation camp.
- Identify any emergency accesses or other accesses to the state classified road required for the workforce accommodation camp.

### Transmission Line

18. In relation to the EIS, TfNSW requires clarification regarding Electricity Transmission Lines that are crossing or near the state classified road network. Provide clarification as to whether the transmission line is included within the scope of The Plains Wind Farm development.

If this is within the scope, the following information is required:

- The heights or depths (under boring) and the vertical and horizontal clearances (overhead) in accordance with Austroads.
- The method for construction of the transmission lines, including demonstrating intermittent closures of State roads for the works will not exceed ten (10) minute delays, with stoppages not exceeding 5 minutes for no more than 6 times per a day and must occur outside of peak hour.
- location of infrastructure relative to the road reserve, including demarcation of local and state classified road reserves.
- If excavation or fill is required adjacent to the road corridor.
- Access required to construct and maintain the infrastructure.
- Strategic concept designs for each transmission line crossing the state classified road network must be provided.
- Access points or access tracks required for ETLs or other infrastructure will require the same level of assessment as the primary project access point and will need to address the matters outlined within this letter for this type of access with the state classified road. Strategic designs and swept path analysis will be required for these types of accesses.

### **Rail Comments in relation to development**

19. TfNSW is the rail authority of the Country Regional Network (CRN) across NSW and the Transport Asset Holding Entity (TAHE) is a State – owned corporation that holds rail property assets and rail infrastructure, including the CRN. As of 29 January 2022, UGL Regional Linx (UGLRL) has been appointed by TfNSW to operate and manage the CRN to ensure any potential impacts to rail corridors are considered and addressed.
20. UGLRL has reviewed the *Environmental Impact Statement (EIS)*, Appendix N – *Traffic and Transport Impact Assessment (TIA)*, and Appendix U – *OSOM Transport Route Assessment – Adelaide to the Plains – Rail Crossings*. The review found that proposed heavy vehicle and Over-Size Over-Mass (OSOM) route will be crossing the Willbriggie to Hay non-operational rail corridor on CRN at one location – Lachlan St (Cobb Highway).
21. The review also found that the OSOM route would cross the ARTC rail corridor (Roto to Broken Hill) at Ivanhoe.
22. The applicant must be aware of all crossings on CRN rail corridors located along the transport routes associated to the proposed development. Therefore, it is advised to include information about the CRN non-operational (Willbriggie to Hay) rail crossing at Lachlan Street (Cobb Highway) Hay NSW 2711 in the EIS documents. In addition, if any adverse impacts to CRN corridor are identified in the EIS documents, the applicant shall seek approvals from UGLRL. Please also note that the applicant must adhere to the transport management and safety requirements of UGLRL and TfNSW for the matters involving CRN corridor.