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Tatsiana Bandaruk
Team Leader, Environmental Assessments
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street,
PARRAMATTA NSW 2150

Date: 17/3/2025

Dear Tatsiana,

Subject: Pottinger Wind Farm – SSD-59235464 – Further Transport RFI

We refer to your email dated 18 February in relation to the Pottinger Wind Farm (SSD-59235464) in which the Department of Planning, Housing and Infrastructure (DPHI) provided additional agency advice from:

- Transport for NSW (letter dated 13 February 2025)

We note that the Project has previously provided the Department with two separate independent opinions in December 2024 and February 2025 that sufficient information has already been provided to conclude the Assessment of this project. These opinions further identified that many of the ongoing additional requests for information from agency are not consistent with the level of information previously required by equivalent approved NSW wind projects and do not align with the Minister's numerous announcements to streamline the assessment process in NSW.

Despite this, the Project has provided significant additional information since December 2024 to support the Assessment as requested and provides further information in the enclosed response table to the most recent TfNSW letter including some additional supporting information in Appendix A. The Project respectfully requests that the Assessment is concluded based on the substantial information provided to date and in the enclosed.

Sincerely,

Tim Mead
Development Director
Someva Renewables

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Agency comment	Response
Pullover bay additional design requirements	
1. The locations for pullover bays for the Barrier Highway are to be identified and included within the revised TIA for locations of the Barrier Highway that have narrow shoulder and lane widths that will prevent following and oncoming traffic from being able to pass the projects high-risk OSOM movements.	Locations of proposed pullover bays for driver management for the full OSOM route were identified in the OSOM Route Survey provided in the EIS. Agency comments to the EIS did not raise this additional request at that time. General commentary has been provided by TfNSW since the RTS was lodged which notes "some areas" along Barrier and Cobb Hwy's have narrower shoulders and lane widths. The distance from the South Australian border to Site on the proposed OSOM route is over 670 km which makes responding to broad, non-specific requests of this nature a challenge. At a meeting on 16 January 2025 with the Department and TfNSW, further details about the narrower locations of concern along the route identified by TfNSW were requested. TfNSW briefly described the locations to be generally along Barrier Hwy and Cobb Hwy focusing on some areas between Wilcannia and Site. No further information on these locations has been provided by TfNSW. As a proactive and conservative approach to further demonstrate feasibility of the proposed route and the indicative *OSOM Pull Over Protocol – Technical Memorandum - Amber* (see Appendix E of RFI response dated 13 February 2025), and to address the general concern raised by TfNSW, the Project focused on identifying optional pullover locations that *could* be used, if required, to support the indicative Protocol. 43 optional pullover locations were identified between Wilcannia and Site. It is noted that only a subset of these locations will be required to achieve the outcomes of the indicative Protocol noting that not all areas along this section of the route are narrow, as noted by TfNSW, and significantly more optional locations have been identified than are necessary to meet the maximum delays discussed further below. The final pullover locations proposed to meet the Protocol will be identified post-approval in a detailed TMP, to be prepared in consultation with TfNSW and the Department.

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2. The typical strategic concept design for each pullover bay proposed along Barrier and Cobb Highway must be overlayed over an aerial at each location to ensure that it encompasses the specific geometric and environmental constraints within the design scope. Visual inspections of each proposed pullover bay will also be necessary to understand any geometric constraints in the horizontal and vertical geometry of the road and road reserves. Note: A desktop review of the submitted locations identifies that most of the pullover bay locations are located within batter slopes, table drains, and grassed verges and would need to factor within the designs additional scope for drainage and batters to ensure that the pavement would suitably drain and allow for the pullover bays to be used in wet weather events.	The aerials from Appendix F (RFI response dated 13 February 2025) have been updated to demonstrate the dimensions identified in the typical strategic concept design previously provided by Amber at all optional pullover locations. **See attached in Appendix A**. Note: the optional pullover locations identified are all either defined existing rest areas or are in existing disturbed roadside locations and therefore are assumed to be both 1) within the public road corridor, and 2) not require further environmental assessment given the heavily disturbed nature. Final design of the selected pullover locations will be completed post-approval at detailed design following preparation of the TMP and consistent with the final OSOM transport movements and management plan in consultation with TfNSW.
3. The typical OSOM Route Pull Over Bays designs prepared by Amber dated 30 January 2025 (DWG No. 768 P01B) within Appendix G submitted as a part of the Someva additional information package on 5 February 2025, identifies the high-risk OSOMs for towers and blades positioned when stopped partially within the through lane. This design prevents oncoming and following vehicles from passing the high-risk OSOM movements when stopped within the pullover bay without crossing into the incorrect lane. The typical strategic concept designs for the pullover bays for all	The current concept design provides a high-level strategic concept to demonstrate feasibility at an arbitrary location. Further refinement of OSOM vehicles within pullover bays will be undertaken post-approval as part of detailed design, in consultation with TfNSW and based on the final number of turbines, type of turbine and associated final transport OSOM types and volumes. Further advice in consultation with Amber: It is not the intention that the OSOM vehicles are required to pull completely off the road at all temporary pull over areas. Some locations are expected to provide sufficient roadside width for the OSOM vehicles to pull over fully off the road and allow clear two-way access. However, it is not considered feasible or necessary to provide 6.5m of clear width on a single side of the road at all locations. Instead, any vehicles travelling behind the load would be able to pass safely using the opposing travel lane which would be facilitated through the

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locations are to be revised to demonstrate that the high-risk OSOM vehicles are contained within the pullover bays.	police escort vehicles. All vehicles would be required to pass at 40km/h given the police escort vehicle would operate with flashing blue and red lights. The time taken for vehicles to pass the load using the oncoming lane would be a matter of seconds based on the proposed transport configuration lengths. Peak hourly traffic volumes along the route are generally expected to be up to approximately 80 vehicles per hour (two-way total) in the worst-case scenario as outlined in the memo, which would provide ample opportunities for vehicles to pass using the oncoming lane without resulting in any notable delays or safety concerns.
4. The throat of each intersection with the state road network is required to be sealed. The strategic designs must include an annotation identifying that the throat of the intersections with the State Road network that form part of the Broken Hill Bypass will be sealed per Austroads and TfNSW requirements.	These requirements are noted. This will be addressed at detailed design if required as a condition of consent.
5. Swept path analysis has been provided for the existing rest areas identified within the ARES route survey 7, 13, and 15. However, swept path analysis was previously requested for rest areas 8, 9, 11, and 14. Swept paths will need to be provided for these locations, and strategic concept designs for all existing rest areas 7,8, 9, 11, 13, 14, and 15 that identify that the existing rest areas will be sealed in accordance with TfNSW requirements will also need to be provided.	This issue was directly discussed with the Department and TfNSW at a meeting on 16 January 2025. The Project specifically addressed the table of rest areas in the OSOM Route Survey and sought confirmation from TfNSW that they are only seeking swept paths for those locations identified to be required by ARES for transport fatigue management. This was confirmed in the meeting and subsequent meeting actions. This action was completed. Rest areas 8, 9, 11, and 14 are designated as backup locations in the OSOM route Survey. No further information is intended to be provided.
Option 11 (1 and 2) design requirements	

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6. The project impacts lighting and power infrastructure at pinch point 11 (1 and 2). The information from Someva on 5 February 2025 does not demonstrate how this infrastructure will be avoided or relocated if impacted by the blade swing. To this point, TfNSW will require further details on how the swept paths of the blade swing will maintain a clearance of 0.5m from the light poles or identify within revised strategic designs (if this cannot be achieved) the removal and relocation of the light poles to a location that the blade swing will not impact.	As per the RFI response dated 13/2/2025 and as confirmed in previous meetings and correspondence with TfNSW, the Project has confirmed that the OSOM vehicle body will avoid the lighting and power infrastructure. The wheel path is expected to use a mountable kerb profile with a concrete apron as identified on the updated strategic design. Updated aerial imagery has been used by Amber in previous responses for Pinch Point 11 options 1 and 2 to provide greater clarity. The Project accepts that 0.5m clearance should be provided as part of final swept path assessments on the blade length selected and transport vehicles used to transport this equipment and is accepting of this as a condition.
Pullover Bay Strategy for the Barrier and Cobb Highway	
7. TfNSW requires further development of a strategy for high-risk OSOM movements that will create a network delay of greater than 10 minutes for the Barrier and Cobb Highway. The revised Pullover Bay strategy for high-risk OSOM movements on the Barrier and Cobb Highway must address the following points and be resubmitted to TfNSW for review before the determination of the project by DPHI, to assess whether the strategy effectively manages the risks to the network and if TfNSW could consider a network delay exceeding 10 minutes. The following points must be addressed within the plan for the high-risk OSOM movements for the Barrier and Cobb Highway: Specify all of the high-risk OSOM that would be subject to this strategy.	Noting that the 10 minute threshold stated by TfNSW has not been previously raised in any correspondence with the Project since the EIS was lodged in May 2024, it is assumed that TfNSW is referring to Amber's advice being that: "*An average delay of approximately 10 minutes for oncoming traffic is proposed as a reasonable impact to balance the potential number of pull over bays required given the length of the route and acknowledging the estimated traffic volumes which are very low along the majority of the route*". As per the Amber Protocol, with a maximum pullover bay spacing of **50 kms**, the approximate delays to road users would be as follows: • Greater than 42% of oncoming vehicles experience no delay, including those vehicles arriving at the end of the procedure. • The average delay for the oncoming vehicles would achieve 11 minutes. • Delays for vehicles following the OSOM loads would be substantially lower, with an average of 3 minutes.

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	As detailed in previous correspondence, the Pullover Protocol and optional pullover locations identified are indicative for the following reasons: • General commentary only has been provided by TfNSW since the RTS was lodged which notes "some areas" along Barrier Hwy and Cobb Hwy have narrower shoulders and lane widths. TfNSW has not yet identified where the sections of concern are along the approximately 670 kms route from the South Australian border. The Project has therefore proactively and conservatively identified substantially more potential pullover options to meet the outcomes of the Protocol than are expected to be necessary. The Project considers it appropriate to confirm the final 'narrower' areas requiring these pullover locations in preparation of the post-approval TMP in consultation with TfNSW. From Amber: "*It is noted that detailed information regarding the existing carriageway widths along the road has not been provided by Transport for New South Wales, and the pull over protocols outlined below are proposed to be applied only to the relevant sections of the route which are yet to be fully determined*"; • The risk identified by TfNSW, of passing wide OSOM loads on rural single carriageway roads, exists across the state network for many SSDs. It is not unique to this Project and is managed through typical police escort and traffic management strategies. It is further noted that the route being proposed is currently approved for Class 1 OSOM vehicles; • The level of detail being requested is unprecedented for a project at this stage noting it would normally be expected in a specialised OSOM TMP post-approval. This is typically the case given among other things, final turbine procurement, detailed design, transport contractor selection, and NHVR permitting considerations are still required prior to finalising these details. Amber has outlined that the majority of the route between Wilcannia and Hay (up to 390km) is estimated to carry very low traffic volumes due to the remote/rural nature of the surrounding area with no access to any major townships or regional centres. It is suggested that the very low traffic volumes combined with a robust communications strategy to

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	clearly articulate the nature of the potential delays to road users (including via roadside VMS signs) and to encourage alternative routes would be appropriate to facilitate the 'leapfrog' mechanism described in the Protocol (where necessary). The Project has taken a proactive and conservative approach of identifying a larger number of indicative temporary pullover locations than are expected to be necessary. The Project has made an update to this list dated 30/01/2025, which is re-attached **at Appendix A**. There are 43 optional pullover locations identified, with an approximate distance shown between the locations. The maximum distance identified between these indicative locations is approx. 20 kms, which is well below the 50 kms proposed by Amber. For information, the below table shows estimated average road user delays for a given distance between pullover locations under the proposed Protocol. This assumes the section of road between these pullover locations is "narrower" and warrants this treatment. The list of indicative pullover locations in **Appendix A** provides substantial flexibility to achieve the outcomes proposed in the Protocol.

Pull-over spacing (km)	Pilot speed (km/h)	OSOM speed (km/h)	OSOM time (mins)	All oncoming users avg delay (mins)
12	110	80	9	2.605263158
20	110	80	15	4.342105263
30	110	80	22.5	6.513157895
40	110	80	30	8.684210526
50	110	80	37.5	10.85526316
60	110	80	45	13.02631579
70	110	80	52.5	15.19736842

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	The substantial level of additional detail now being requested by TfNSW in the remainder of section 7 of the letter is unprecedented for wind projects in NSW prior to approval. Addressing these requests would cause a significant delay to the assessment of the project, especially noting these requests have not been raised at any previous juncture since the EIS was lodged during which time the proposed OSOM route has not changed. No authoritative instrument has been identified by TfNSW which requires this level of detail at this stage of the project. Further, use of the Cobb Hwy for OSOM vehicles was identified in the Scoping Report, lodged in June 2023, and no requests of this nature were identified in TfNSW's SEARs Advice for the Project. The level of detail requested would be consistent with a specialised post-approval Traffic Management Plan for OSOM transport for these sections of road (noting the exact sections of concern have not been identified by TfNSW at this stage, as above). Given this, the Project proposes that these details be incorporated into the post-approval Traffic Management Plan (if the Department considers this appropriate), developed in consultation with TfNSW. This approach will allow for a more accurate and thorough response with greater details available from turbine and transport providers, while reducing unnecessary delays to the assessment process.
Bridge and culvert assessment requirements	
8. Bridge and culvert assessments must be completed to ensure the adequacy of the structures for the load dimensions and mass for the high-risk OSOM movements. A bridge and culvert assessment can be requested from the appropriate team within TfNSW at the following email: spu@transport.nsw.gov.au. The proponent must include the routes to be assessed, the laden load dimensions and weights, and vehicle configurations as part of	Noted. This will be completed post approval. As previously advised: 1. ARES undertook a full survey of the proposed OSOM route from Port to Site and concluded in their OSOM Route Study (provided in the EIS and as updated in the RTS) that the route is suitable for the project with the identified road upgrades. No bridge / culvert upgrades were identified to be required. 2. In confirming this, ARES calculated an indicative axle load of 15 tons per axle for OSOM vehicles.

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this request. The bridge and culvert assessment will only evaluate the TfNSW bridge and culvert assets for the identified routes.	3. In response to TfNSW's EIS request, the Project committed to further consultation with the TfNSW Freight Operations team regarding their bridge and culvert assessments, post-approval following detailed design and once final turbine and OSOM vehicle dimensions are known (noting these dimensions have been conservatively assessed in the EIS). This approach is typical of other previous wind farm approvals in NSW.

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Appendix A

Pottinger Wind Farm

Barrier/Cobb Highway Temporary Pullover Bay Options
30/01/2025 Update 17/03/2025.

NOTE: The final locations for use will be determined following detailed design and identified in the TMP and relevant OSOM permits. The below table provides existing options for temporary use to demonstrate the concept. It is unlikely that all locations will be required noting the surplus of options assessed. The ‘streetview’ available at the Gmaps Link has not been updated since 2010 in some locations and therefore has generally not been relied upon.

Where possible the Project will seek to select the final pullover locations that allow the full vehicle to pull off the road, and do not require the OSOM vehicle to cross to the other side of the road.

Additionally, where necessary, the Project will seek to limit the distance between pullover locations to 20kms or less in areas where the 'leapfrog' protocol is required, subject to consultation and agreement with TfNSW and DPHI in preparation of the TMP.

In vertical order (starting in the North)			
Pullover Bay Index	Description	Gmaps Link	Distance from Last Bay(km)
1	Option for temporary blade truck and base tower truck pullover.	Link	0
2	Option for temporary blade truck and base tower truck pullover.	Link	3.1
3	Option for temporary blade truck and base tower truck pullover.	Link	3
3.1	Option for temporary blade truck and base tower truck pullover.	Link	5.5

4	Option for temporary blade truck and base tower truck pullover.	Link	15.7
5	Option for temporary blade truck and base tower truck pullover.	Link	14.6
5.1	Option for temporary blade truck and base tower truck pullover.	Link	12.4
6	Option for temporary blade truck and base tower truck pullover.	Link	6.7
7	Option for temporary blade truck and base tower truck pullover.	Link	3.3
8	Option for temporary blade truck and base tower truck pullover.	Link	12.4
8.1 opt	Option for temporary blade truck and base tower truck pullover.	Link	1.5
9	Option for temporary blade truck and base tower truck pullover.	Link	16.6
10	Option for temporary blade truck and base tower truck pullover.	Link	12.4

11	Option for temporary blade truck and base tower truck pullover.	Link	4.1
12	Option for temporary blade truck and base tower truck pullover.	Link	15.5
12.1	Option for temporary blade truck and base tower truck pullover.	Link	18.7
13	Option for temporary blade truck and base tower truck pullover.	Link	15.6
14	Option for temporary blade truck and base tower truck pullover.	Link	3.2
15	Option for temporary blade truck and base tower truck pullover.	Link	8.9
16	Option for public traffic queuing (opposing direction).	Link	10.6
16.1	Option for public traffic queuing (opposing direction).	Link	18.2
17	Option for temporary blade truck and base tower truck pullover.	Link	3.3

18	Option for temporary blade truck and base tower truck pullover.	Link	12
18.1	Option for temporary blade truck and base tower truck pullover.	Link	13.3
19	Option for temporary blade truck and base tower truck pullover.	Link	10
20	Option for temporary blade truck and base tower truck pullover.	Link	9
20.1	Option for temporary blade truck and base tower truck pullover.	Link	11.1
21	Option for temporary blade truck and base tower truck pullover.	Link	13.8
22	Option for temporary blade truck and base tower truck pullover.	Link	3.2
23	Option for public traffic queuing (opposing direction).	Link	17
24	Option for temporary blade truck and base tower truck pullover.	Link	17.2

25	Option for temporary blade truck and base tower truck pullover.	Link	13.3
26	Option for temporary blade truck and base tower truck pullover.	Link	11.4
27	Option for temporary blade truck and base tower truck pullover.	Link	9.9
27.1	Option for temporary blade truck and base tower truck pullover.	Link	5.5
28	Option for public traffic queuing (opposing direction).	Link	15.9
29	Option for temporary blade truck and base tower truck pullover.	Link	20.5
30	Option for temporary blade truck and base tower truck pullover.	Link	6.3
31	Option for temporary blade truck and base tower truck pullover.	Link	13.1
32	Option for temporary blade truck and base tower truck pullover.	Link	2.6

33	Option for temporary blade truck and base tower truck pullover.	Link	4.4
34	Option for temporary blade truck and base tower truck pullover.	Link	5
35	Option for public traffic queuing (opposing direction).	Link	6.5
	OR		
	Option for temporary blade truck and base tower truck pullover.		
36	Option for temporary blade truck and base tower truck pullover.	Link	5.9

Pullover Bay #1

Clearance Check:

Pullover Bay #2

Clearance Check:

Pullover Bay #3

Clearance Check:

Pullover Bay #4

Clearance Check:

Pullover Bay #5

Clearance Check:

Pullover Bay #5.1

Clearance Check:

Pullover Bay #6

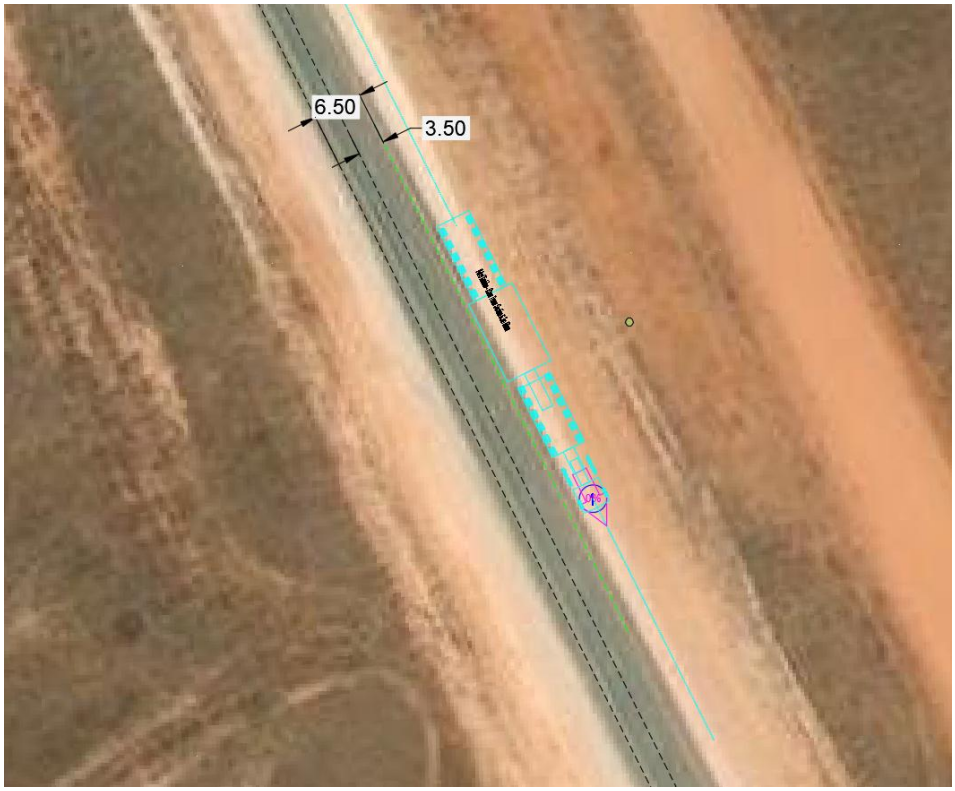
Clearance Check:

Pullover Bay #7

Clearance Check:

Pullover Bay #8

Clearance Check:



Pullover Bay #8.1

Clearance Check:

Pullover Bay #9

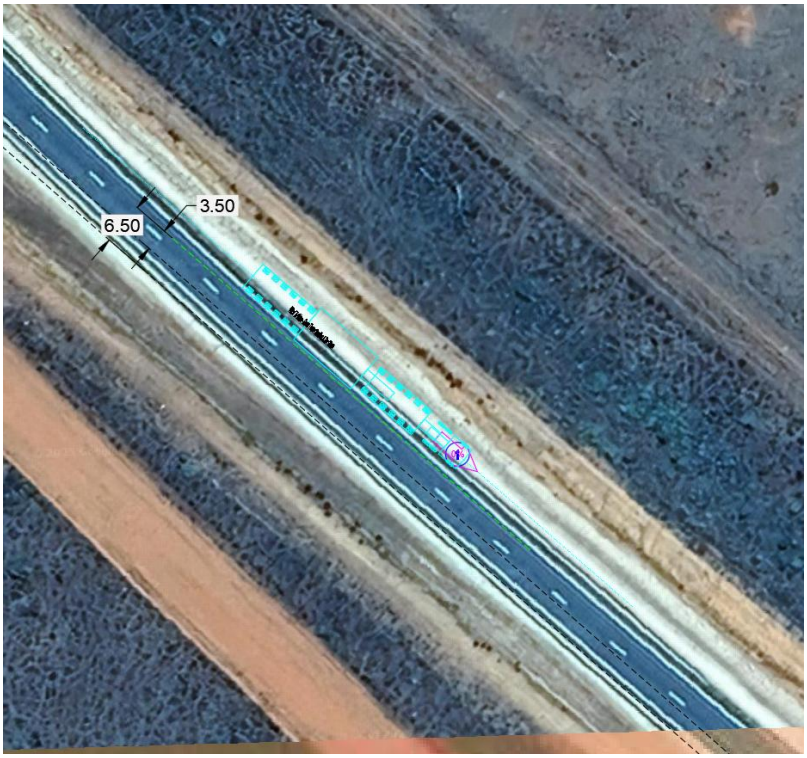
Clearance Check:

Pullover Bay #10

Clearance Check:

Pullover Bay #11

Clearance Check:



Pullover Bay #12

Clearance Check:

Pullover Bay #12.1

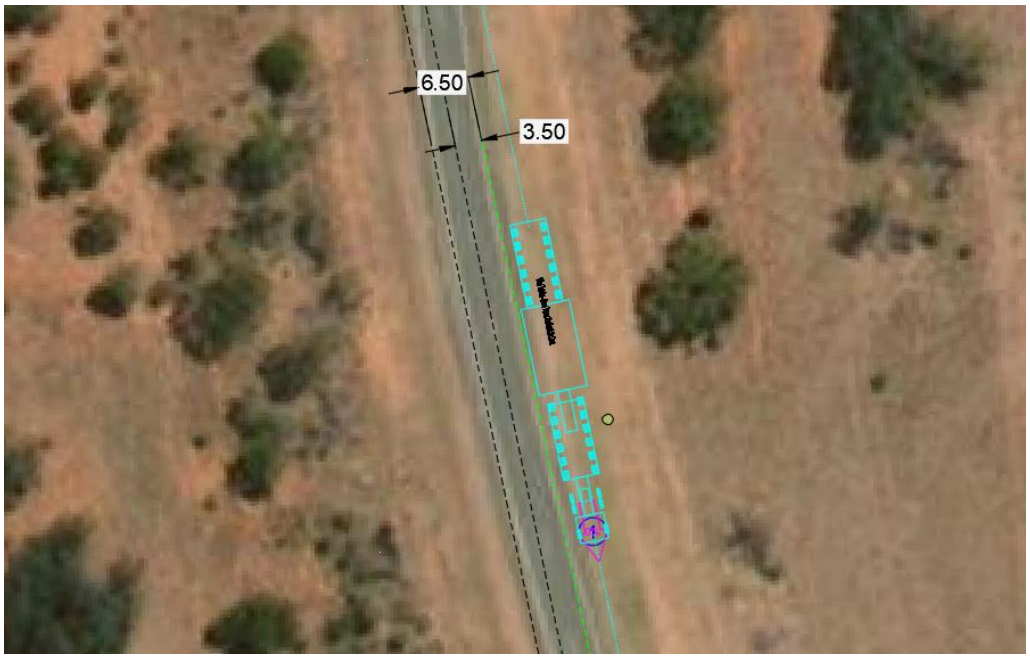
Clearance Check:

Pullover Bay #13

Clearance Check:

Pullover Bay #14

Clearance Check:



Pullover Bay #15

Clearance Check:

Pullover Bay #16

Clearance Check:

Pullover Bay #16.1

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Pullover Bay #17

Clearance Check:

Pullover Bay #18

Clearance Check:

Pullover Bay #18.1

Clearance Check:

Pullover Bay #19

Clearance Check:

Pullover Bay #20

Clearance Check:

Pullover Bay #20.1

Clearance Check:

Pullover Bay #21

Clearance Check:

Pullover Bay #22

Clearance Check:

Pullover Bay #23

Clearance Check:

Pullover Bay #24

Clearance Check:

Pullover Bay #25

Clearance Check:

Pullover Bay #26

Clearance Check:

Pullover Bay #27

Clearance Check:

Pullover Bay #27.1

Clearance Check:

Pullover Bay #28

Clearance Check:

Pullover Bay #29

Clearance Check:

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Clearance Check:

Pullover Bay #31

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Pullover Bay #32

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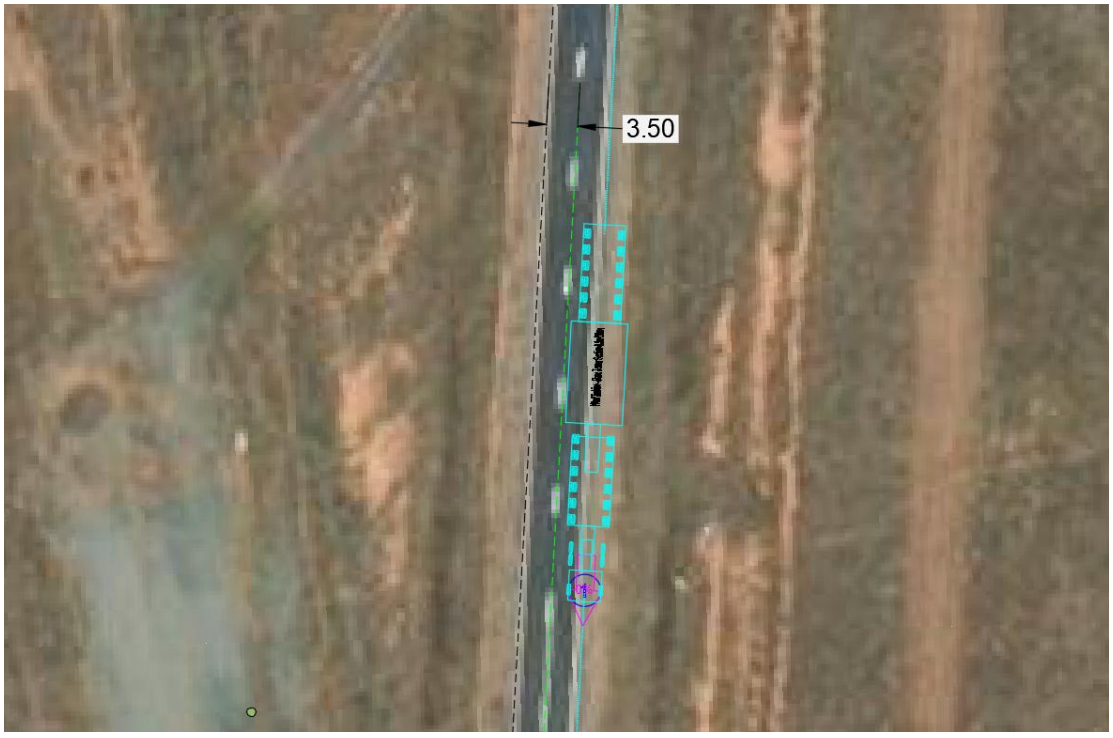
Pullover Bay #33

Clearance Check:



Pullover Bay #34

Clearance Check:

Pullover Bay #35

Clearance Check:

Pullover Bay #36

Clearance Check: