



WST14/00033

The Manager
Energy, Infrastructure Projects
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Neville Osborne

Dear Mr Osborne

MP10_0053: Exhibition of Environmental Assessment; Paling Yards Wind Farm

Thank you for your email on 3 April 2014 referring the Environmental Assessment (EA) for the Paling Yards Wind Farm to Roads and Maritime Services for comment.

The EA has been reviewed and Roads and Maritime has identified a number of issues which require the proponent to reconsider the method and route for the transportation of materials to the site.

In light of the number and type of vehicles generated by this development proposal, Roads and Maritime raises serious concerns with the proposal in its current form. In this regard, the issues identified are provided below for your consideration:

- The selected road transportation routes for materials from Port Kembla and Port of Newcastle to the site assumes access from Sydney using Bells Line of Road (MR184) and possibly Great Western Highway (HW5). Access across the Great Dividing Range for over size/over mass and some low loader vehicles is not possible using Bells Line of Road and may not be possible using Great Western Highway. Transportation access from east to west by road will need to be obtained, subject to approval, via roads other than Bells Line of Road. In developing new routes, the proponent is strongly encouraged to consult with Roads and Maritime Special Permits Unit on 1300 656 371.
- The applicant has stated that final transportation routes will be determined as part of the development of and approval of a Traffic Management Plan (TMP). Access to the site, particularly for over size and over mass vehicles, is critical to the establishment of the proposed wind farm and transportation routes for these and other types of vehicles should be determined as part of the development application process.
- The Transport Impact Assessment (TIA) lacks a robust assessment of alternate methods of transportation of materials to the site (eg rail). Partial usage of alternative transport methods would minimise disruption to traffic using the State road network.

Roads and Maritime Services

- The TIA does not provide an assessment of tourist traffic generated by the proposed development. Roads and Maritime's previous experience with wind farms has shown that viewing platforms with wind farm information available at strategic locations allows motorists to safely pull off the road to view wind turbines and minimises unsafe viewing and driving practices.
- Cumulative impacts provided in the supporting documentation focuses on other wind farms in the region and not on other developments/works such as mining proposals and road upgrades. For example, in the event that the Great Western Highway is proven to be a suitable transportation route, upgrades at Kelso and Forty Bends will impact on transportation of materials, staff, etc to the site.
- No detail of intersection upgrades to accommodate over-size/over-mass vehicles has been provided. The applicant has stated that details of intersection and access upgrades will be provided in the TMP.

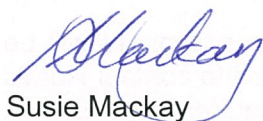
Notwithstanding the concerns held by Roads and Maritime in relation to this project as submitted, the following submissions are made for your consideration:

- Prior to the commencement of construction works, a Traffic Management Plan (TMP) shall be prepared for the project in consultation with and approved by Oberon Council and Roads and Maritime. The TMP shall identify the proposed route(s) and associated impacts (temporary street closures, removal and replacement of road infrastructure, upgrading of road infrastructure, etc.) which will be required in order for necessary materials and machinery to be delivered to the site. The TMP shall include assessment of high risk locations that prevent safe two-way passage of traffic and how traffic movements are to be negotiated, projected delays experienced by traffic on affected roads (origin to destination), cumulative impacts and mitigating measures to be employed. The applicant is to be accountable for transport operations complying with the TMP as well as the haulage contractor.
- Prior to any haulage requiring over-size/over mass vehicles and loads the proponent will be required to obtain special permits. To obtain a permit, the proponent will need to contact Roads and Maritime's Special Permits Unit in Glen Innes on 1300 656 371; The requirements outlined in Roads and Maritime's publication *Operating Conditions: specific permits for oversize and over mass vehicles and loads* are to be followed. This publication is available online at: www.rms.nsw.gov.au/heavyvehicles/oversizeovermass
- If any parts of the proposed transport routes on classified roads are unable to cater for the project related traffic and transport, the proponent is required to improve such part of the road to safely cater for the length, size and volume of vehicles and their loads and to protect the integrity of the classified road network. This may include the proponent constructing stopping bays (suitable hard stand areas) at distances and dimensions determined by Roads and Maritime. These areas would be required along proposed routes to allow following vehicle queues to pass. Upgrades of the road network shall be determined following submission of the TMP and constructed prior the commencement of construction works.
- Prior to any work on the State classified road network, the proponent will be required enter into a formal agreement in the form of a Works Authorisation Deed with Roads and Maritime.

- Any disturbances to traffic lanes, shoulders, verges or other disturbance within the road reserve of classified roads are to be reinstated to pre-existing or better condition. This includes any impact on the road pavement, culverts, bridges, causeways, signage and traffic islands.
- Prior to the commencement of haulage operations, a full and independent risk analysis and inspection of the transport route(s) is required and a copy of the analysis is to be supplied to Roads and Maritime. Further analysis and reporting to assess possible damage to and repair of the route will be required on a regular basis and at completion of construction works.
- Roads and Maritime requires a commitment from the proponent to provide funding for the maintenance and repair of any affected classified roads for the duration of transportation of over size and over mass vehicles and loads, to the satisfaction of Roads and Maritime. The commitment to fund maintenance and repairs shall be included in the TMP.
- Vehicles transporting loads will not be permitted to travel in convoys or platoons unless specifically permitted by the relevant roads authority and/or Roads and Maritime.
- Convenient and easily accessible areas shall be identified and appropriate facilities provided for members of the public to safely view wind turbines.
- All arrangements for the control of traffic on classified roads are to be in accordance with Roads and Maritime's publication *Traffic Control at Work Sites*. A Road Occupancy Licence will be required prior to any works commencing within three (3) metres of the traffic lanes of state classified roads and submission of a TMP will be part of Road Occupancy Licence(s).

Please forward to Roads and Maritime a copy of the determination issued in relation to this matter at the same time it is sent to the applicant. Should you require further information please contact Andrew McIntyre (02) 6861 1453.

Yours faithfully



Susie Mackay
Network & Safety Manager
Western

30/05/14