

There is so much wrong with the Jupiter EIS. Rather than saving it all for a book sized submission at the end, I will deliver it a chapter at a time.

## **CHAPTER 2.**

### **Where Captain Traffic gets it wrong in the first line and it goes downhill from there.**

“ERM on behalf of EPYC Pty Ltd commissioned GTA Consultants to undertake a traffic and transport impact assessment for a proposed wind farm development in Jupiter, NSW.”

One of the (unique) differences of the Jupiter site is that the three individual precincts can only be individually accessed via a dilapidated state road and, additionally, parts of all three precincts can only be accessed from within by crossing local roads.

This presents a transport logistical challenge never addressed by GTA Consultants (GTA)

From reading the traffic and transport impact assessment, you’d swear the developer at the time was planning to build three separate wind farms.

The only difference in the revised SEARs in the traffic and transport section was the addition of:

“consideration of necessary road upgrade and/or maintenance contributions  
to the relevant Council to address impacts on the local road network”<sup>1</sup>

This was an improvement but then again, GTA only had to consider it. Did they?

It was supposedly to be addressed in section 5.2. It wasn’t.

They touched on the issue:

“This report does not include an assessment of the structural integrity of roads and bridges surrounding the site nor does it include a dilapidation survey of the existing roads. These assessment features are beyond the scope of this report. “

What the Department and the community regards as an extremely important issue becomes an “assessment feature” to be addressed, like many other items of fundamental importance at EIS stage, in some promised “detail design” phase. That is not what the SEARs require.

### **Traffic Volume Calculation Methodology.**

This is one of the best sections, where you would expect the skills and expertise of highly trained traffic consultants to shine.

GTA arrived at a maximum figure of 308 Vehicle Trips during construction (each way) per day. (not 300 or 310, but 308).

How did they come up with such accuracy.

ERM tells us <sup>2</sup>:

“These estimates have been developed in reference to traffic generation data contained within traffic impact assessment reports prepared for recently assessed wind farm projects”  
(my emphasis)

GTA confirms this.<sup>3</sup>

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<sup>1</sup> Transport Impact Assessment Report. Page 2

<sup>2</sup> EIS Main Report. Page 13.7

<sup>3</sup> Transport Impact Assessment Report. Page 17

**They totally relied on the irrelevant expertise of other parties.**

Which recently assessed wind farm projects did they rely on?

Gullen Range, Rye Park, Crookwell 3 and Paling Yards.

Gullen Range is constructed and the other 3 are at various stages in the pre-assessment process.

For the latter 3, they are relying on somebody's predictions for a totally different wind farm.

For Gullen Range, you would expect them to be able to rely on the **actual** vehicle movements experienced during construction. You would be wrong. The figure for Gullen Range (and GTA gets it wrong in transcription) comes from the original 2008 traffic and transport section of the EIS.<sup>4</sup> Despite the claim above, there was no "traffic generation data" from these wind farms on which GTA could base its Jupiter claims.

**Did the Department, by the way, notice that Epuron in the 2012 Rye Park EIS copied in all detail, the traffic figures from the 2008 Gullen Range EIS.**

The Department might like to consider this false and misleading conduct before it gets to the PAC. Not being the authors of the 2008 study, it wasn't even their data to plagiarise.

Also, did GTA consider this glaring "coincidence" before relying on this data for its Jupiter volumes? This perhaps explains their error in transcribing the Gullen Range volumes from 296 to 298. Having two wind farms with identical 296 figures might have grabbed somebody's attention, you'd hope.

**In summary, Jupiter traffic movements are based on the guesses, in some cases dodgy, of others**

However the figures are arrived at, they are still subject to many vagaries. Three years down the track we still find:

"At this stage the detailed construction programme is not known (i.e. volume of concrete, number of employees, material and plant requirements, etc.)"

You would expect a competent traffic consultant to be able to come up with something better than this. They know the number of turbines - take the one that requires the most concrete in its base. They know the number of construction employees. Assume the worst case in their vehicle usage strategy, and so on.

**Lower Boro Rd.**

GTA does not tell you anything about the traffic and transport impacts on Lower Boro Rd. They do assure us:

"It is noted that the access roads servicing the Northern Precinct cross Lower Boro Road, however, vehicles will not use Lower Boro Road to access the site.

Therefore, turbines 73, 44, 87 and 75 will be serviced from the North of Lower Boro Rd via two new crossings.<sup>5</sup>

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<sup>4</sup> Page 13. TRAFFIC IMPACT STUDY. Bega Duo Designs March 2008

<sup>5</sup> EIS Main Report. Page 3.10

All blades, towers nacelles and other componentry for these four turbines will cross Lower Boro Rd after wending their way on 6 metre (or is it 8) wide gravel access tracks through Jupiter North from the Northern Access Point on the Braidwood Goulburn Road. All construction equipment, bulldozers and cranes, will do likewise. All construction support vehicles will do likewise. Trucks carrying thousands of tonnes of concrete will follow the same route. Lower Boro Rd traffic will be disrupted as these four access points are built and the road crossings modified to take this traffic. All vehicles will return the same way.

I'm surprised that during correspondence (all of which seems to be verbal) with Mr Gordon Cunningham from the old Palarang Council it was agreed that "no upgrades or maintenance will be required"<sup>6</sup> to Lower Boro Rd, or moreso, the general topic of this cross traffic, and its dangers, was not discussed.

Surely all of this was worth a mention in a Transport Impact Assessment Report?

### Manar Rd

GTA appears to have totally missed the fact that turbines 29, 35, 47, 62, 63 and 64 are on the south side of Manar Rd. (the entrance to the Southern precinct and the works site/concrete and crushing plant being on the north side). So, all the comments made above for Lower Boro Rd apply equally as well to Manar Rd. There would also appear to have been no discussions with the old Palarang council on road usage or safety for this crossing.

### Duckfield Rd

The same comments for Lower Boro Rd apply to turbine 17 to the South of Duckfield Rd. Whilst ERM was aware of the Manar Rd crossing they forgot to tell us about the Duckfield Rd crossing:

"Access roads (and associated electrical reticulation network) are proposed to cross the following public roads that are controlled by the former Palarang Council:

- two crossings of Boro Road in the Northern Precinct; and
- one crossing of Manar Road within the southern precinct.<sup>7</sup>

(but then turbine 17 was always going to be sacrificed in EPYC's proposed compromise.)

EPYC has added four crossings of public roads which we did not need. The Queanbeyan/Palarang council and Roads and Maritime Services need to comprehensively study the traffic and safety issues of these new intersections.

And assuring us that these crossings and the roads they are on won't be used for construction traffic is just nonsense (or false and misleading if you prefer). Common sense tells you that lighter vehicles leaving the site will do so by the most convenient of the eleven (11) access points.

### The school bus facts.

GTA advise:

"A review of the public transport available in the vicinity of the site indicates that no public bus services run along Braidwood-Goulburn Road. However, a school bus service operates between Goulburn and Lake Bathurst."

implying that there are no school bus services between Tarago and the Kings Highway (spanning the complete Northern and Central precincts of the wind farm)

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<sup>6</sup> Transport Impact Assessment Report. Page 32

<sup>7</sup> EIS Main Report. Page 4.21

The safety of their children has long been an openly expressed concern of local parents. EPYC is aware of it. How did they let a statement like the above through their EIS approval process?

There are a number of morning and afternoon services.

School bus pickup points are in the vicinity of the Roseview and Barnet Estates. Both are near the dangerous Northern and Central site access points respectively.

Naturally, GTA, by claiming there is no issue, automatically fails to address community concerns. False and misleading; an offence I believe.

The mobile concrete batching plant and its impact on heavy vehicle movements.

“A temporary mobile concrete batching plant to supply concrete for WTG footings and substation construction works, and potentially rock crushing facilities for the generation of suitable aggregates for concrete batching or sized rock for access road and hardstand construction. Three representative locations and associated access roads for these facilities have been incorporated in the EIS, which would be utilised at various times as construction progresses across the PA.”

Wouldn't any similar wind farm project have onsite concrete batching? Construction common sense will determine when the CBP moves within precincts. For instance, you would use up the raw materials at a site before moving on.

Whatever transpires, it is not a difficult process to build the major alternatives for concrete production and transport of the raw materials and finished product into a traffic and transport impact assessment.

Regarding the downplaying of the Visual Impact and Noise implications of the Concrete Batching Plant (CBP), CBP 3 and, we assume, its rock crusher, all this plant is closer to Roseview estate than the turbines. Similarly for CBP 2 and the Barnet estate.

Miscellaneous issues with and comments regarding the transport plan

Has there ever been a 63 metre blade transported south past Tarago on the Braidwood/Goulburn Rd?

“It is generally configured with a 7-8m wide carriageway with one traffic lane provided in each”

The road width between verge markings at the dangerous access point to the central precinct is closer to 6 metres.

“For the most part the Jupiter Wind Farm will be designed to operate automatically, however ongoing monitoring and maintenance of the wind farm will be required. Once constructed, it is anticipated that there would be of the order of 32 full-time equivalent positions associated with the operation of the wind farm, consisting of an onsite full-time workforce of approximately 14, and the remainder likely to consist of external contractors and service providers as required.”

These mythical operational positions will be analysed in a further chapter on Economic Impacts. Suffice to say here that these forecasts vastly exceed what is observed at actual operating wind farms

The indicative construction timeframe is expected to be in the order of 36 months  
Or is it 21 (earlier in the Transport plan) or 24 months as ERM advises.

123 vehicle trips per hour during peak construction periods<sup>8</sup> effectively doubles the current traffic  
at the southern section of the Goulburn Braidwood Rd

“In addition, the nearby Capital 2 Wind Farm may be under construction or operational by  
the time construction commences on the Jupiter Wind Farm”

GTA may be right for the wrong reasons but a prudent Transport Impact Assessment Report would  
consider the potential cumulative impacts.

“Reducing the speed limit on the frontage roads would likely reduce the risk of accidents  
occurring at the access points. The current speed limit on Goulburn-Braidwood Road and  
Kings Highway is 100kmh. There would be an opportunity, if supported by RMS, to  
introduce a temporary 80km/h speed limit at each of the site access locations on Goulburn-  
Braidwood Road and Kings Highway throughout the construction phase.

The proponent would support any potential speed reductions at the site access points”  
Of course they would. They are dangerous.

Why should the community suffer from 80 kph speed limits for 21, 24 or 36 months.

We’ve reached a new low. Google Street View is used to depict some of the Access Points.  
Notice the double lines at the Central Access Point. It is dangerous.

308 movements become 308 heavy vehicle movements. Which is correct?

You would expect the Traffic Impact Assessment report to address “traffic noise during  
construction and operation” as required by the SEARs, but it doesn’t. It may turn up elsewhere.

Did GTA give one word on traffic and transport impacts during decommissioning? Not one.  
Probably because the Department didn’t ask for it, and no developer volunteers information that  
wasn’t asked for. However, traffic and transport impacts during decommissioning will be different  
and significant.

I have not considered transport from dock to site. Hopefully our very competent “truckies” can  
make it happen.

Once again, the Department of Planning has deemed this section of the EIS “adequate” for public  
review.

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<sup>8</sup> Table 4.5. Transport Impact Assessment Report