

21 December 2018

Mr Tim Stuckey  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Stuckey

**RE: Boco Rock Wind Project – Modification Proposal**

As discussed previously, our engineering (roads) section have provided some comments in relation to the roads conditions in the original Part 3A consent, and how they worked/didn't work or could be improved.

These points listed below are provided as feedback and may be useful for the proponent to consider in their response:

- The road dilapidation reports were less than effective, and this was agreed by both parties. The reports were disregarded early in the construction;
- The nomination of a suitably qualified expert to assess existing conditions produces a generic report of limited use;
- Traffic and Transport Impacts conditions 2.28 & 2.29 refer to the Pre-Operational Dilapidation Report being done in consultation with Council, which is the opportunity to provide input and identify known problem or weak areas. These areas may appear satisfactory but will not perform well under additional Heavy vehicle volumes;
- Traffic and Transport Impacts condition 2.29 refers to the Pre-Operational Report identifying damage attributable to the construction but no reference is made to the Post-Operational Report. It is recommended that this be included in the modified approval if issued;
- The addition of an increased frequency of the construction vehicles will have a far greater impact than a small volume of overweight/oversize vehicles performing deliveries. For example, while the number of oversized vehicles may be reduced due to the reduction in the number of towers, the day to day increase in construction vehicles (concrete trucks, delivery vehicles etc) will have a significant impact on existing road conditions;
- The last stage required continuous monitoring and maintenance to maintain the level of service, and if this is done effectively by Council, then the developer will be left with a Post-Construction Dilapidation Report showing that all is acceptable, and the project has had no impact on the local road network;

- The concept that damage that occurs can wait to the end of a project and be remediated following the post construction dilapidation inspection, will not meet Community, or the contractor's requirements. Opportunities for the developer to contribute to ongoing maintenance of the local roads they impact should be put in place. It is recommended that this be incorporated into amended conditions; and
- The route clearance is of less concern as that will be assessed in detail to ensure no damage to the equipment.

One of our major concerns in relation to the modification proposal is the ongoing maintenance of the Council road network damaged during construction. The project must budget for and participate in maintaining the surrounding road network impacted by the construction.

We ask that the initial dilapidation report to be carried out in conjunction with Council and that regular road inspections are carried out in consultation with Council during construction on a monthly basis, as well as a commitment to maintain affected roads prior to the next inspection.

If the roads are maintained during construction, the Post-Construction Dilapidation Report should have little to identify. This will also reduce the impact on the community.

Thank you for the opportunity of providing this feedback.

Yours faithfully



Peter Smith  
Director Environment and Sustainability