



Contact: Sharon Langman
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Your Reference: SSD6686

28 November 2016

Diana Charteris
Senior Planning Officer
Resource Assessments
Planning Services
Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Charteris

BANGO WIND FARM

I refer to the above development application, which is currently on public exhibition. On behalf of Council I raise the following issues for consideration and resolution during the assessment process.

Water Resources

Water consumption during construction and the source of that water draw are a concern for Council. The proposal will require significant water resources during the construction phase and the source of that water has the potential for consequential impacts upon the water availability for agricultural and potable water supplies.

Decommissioning

Council would like assurances that conditions and checks are in place to ensure that when the life of the turbines are exhausted there is sufficient funds and authority for the towers and turbines to be removed, the area rehabilitated and that the community of the day does not bear the cost of such removal.

It is anticipated that impacts on the road network during decommissioning will be similar, albeit reduced, to those during the construction phase of the project. The mitigation of these impacts needs to be resolved prior to construction.

Waste

Waste generation during construction, operation and decommissioning has the potential to negatively impact upon Council's waste facility and ability to manage such waste is limited. Council's preference is that the developer funnels all non-recyclable waste through the regional waste facility, rather than Council's local facility.

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Community Funds

Council believes that the developer should enter into a Voluntary Planning Agreement with Council, similar to that of the Rye Park Wind Farm. The Planning Agreement should be negotiated equitably across the three local government areas of Hilltops, Yass Valley and Upper Lachlan. The proponent is proposing a contribution of \$2,500 however given that the Rye Park Wind Farm has this amount with a CPI annual increase it is not unreasonable for the imposition of a figure commensurate with that proposed by Yass Valley Council of \$2,825 per turbine with a CPI Annual increase provision.

Noise Impacts

Whilst Council is not in a position to attest to the adequacy of the Noise assessment contained in the EIS, Council is aware of community concerns surrounding the potential noise impacts of the development, particularly in light of the recent approval of the nearby Rye Park Wind Farm. Council is concerned that should the proposal receive consent Council will be the recipient of noise complaints which present a significant administrative burden on Council resources.

Community Consultations

A PAC determination hearing should be held locally which would provide the opportunity for all submitters to address the members with their concerns before any determination is made. Ideally the hearing should be to receive representations from those submitters wishing to address the Commission following which the Commission should retire to properly consider these representations, the assessment report and make a considered and reasoned decision. Far too often the PAC has simply taken submissions and announced its decision, leaving local communities questioning the purpose of the hearing and the role of the Commission.

Traffic Impacts

Council has concerns that it is the heavy vehicles associated with the transport of gravel, sand, cement, etc during construction that account for a significant amount of damage to local road infrastructure. The oversized vehicles carrying the turbines and towers in fact do minimal damage in comparison. The local road infrastructure is adequate to cater for the existing low levels of low traffic; however the addition of construction traffic has the potential to significantly compromise road safety and infrastructure. It is for this reason that upgrades as defined by Council need to be upgraded prior to any construction works commencing, should the development receive consent.

The local road network must be maintained by the development throughout the entire construction phase as local traffic will contribute only a minor portion of road deterioration impacts. The majority of the roads proposed for use are not of a suitable standard and will deteriorate quickly requiring regular and ongoing maintenance raising economic, safety, and public relations concerns for both Council and the applicant. Council believes it is most cost efficient to for upgrades to occur prior to construction rather than regular and ongoing repair during construction. Council suggests the following standards for road upgrades, subject to site constraints: sealed road standard = 8.5m wide formation with 7m wide 14/7mm double/double seal, 200mm thick road base pavement with drainage structures to be upgraded as required; unsealed road standard = minimum 6m wide with minimum gravel thickness of 100mm.

Gravel Resources

Whilst the proponent has identified roads that are to be utilised as part of this proposal, this does not appear to take account of the roads to be utilised to win gravel material for both on site road construction and upgrading of Council's local road infrastructure. It is necessary for the proponent to identify the source of the gravel in order that Council can be satisfied that the resource site has the appropriate approvals in place and is contributing to the maintenance and upgrading of the local road infrastructure network utilised by that resource site. Council has concerns that the proponent may source gravel from a site that is not appropriately approved and that additional negative impacts to the local road network may result for which the developer will not be required to make a contribution or undertake remediation works.

Should you require any further information in this regard, please do not hesitate to contact me, on (02) 6386 0100 during business hours.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sharon', with a stylized flourish at the end.

Sharon Langman
DIRECTOR PLANNING

Traffic & Transport

A number of discussions have been held with the proponents of the Bango Windfarm in relation to traffic and transport issues. Whilst these discussions have progressed in relation to Council road requirements and appropriate road standards, agreement has not yet been reached on required road and structure upgrades, or other road management related issues.

Council owned roads that have been identified for use as transport routes on the project are low standard, low volume roads which are constructed to cater for predominantly light vehicles. The structural capacity of the road pavement on these roads is not capable of withstanding large numbers of heavy vehicles, and many sections of road will deteriorate rapidly if used in their current condition. These sections need to be upgraded prior to construction of the wind farm to ensure the ongoing safety of road users. A “damage and fix” approach will not provide a satisfactory outcome for a large proportion of the road network.

Council has concerns in relation to the ongoing maintenance of the road network during the construction phase of the windfarm, to ensure the timely repair of damage caused by construction traffic. Noting that Council cannot absolve its responsibilities as a road authority under the Roads Act 1993, the consent should clearly state that the applicant is responsible for the cost of any maintenance to the road network during construction activities, and require a binding Deed of Agreement to be signed by the parties to provide a mechanism for identification, prioritisation, and rectification of any defects, and the apportionment of the cost of such works. The ongoing safety of the road network during construction is a major priority for Council.

It is noted that proposed sources for raw materials such as gravel for use on internal and external road networks, have not yet been defined. This is of concern to Council as it is considered likely that local sources close to the project site will be utilised rather than purchasing gravels from existing commercial quarries which are some distance away. The transport of gravel and other raw materials could potentially utilise routes not identified in the Traffic and Transport Assessment and would have a significant detrimental impact on road safety and the local road network in general.

Until final agreement is reached in relation to required road upgrades, road maintenance during the construction phase, and dilapidation management, Council continues to have concerns regarding the safety of the road network and the potential cost of damage to local roads. Whilst the impacts of the relatively low number of very large oversize vehicles can be managed via a Traffic Management Plan, Council’s primary concern is with construction related traffic transporting materials and equipment to the site.

To ensure Council is able to reach agreement with the proponents, and noting that actual transport routes are not yet finalised, suitable conditions of consent should be included to ensure Council’s agreement with the proposed road standards and extent of road upgrades, and to obtain Council’s approval of the Traffic Management Plan for the project prior to any works commencing. The consent should also provide sufficient flexibility to allow for further road upgrades if necessary once final material sources and transport routes are confirmed.