



Contact: Sharon Langman
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Your Reference: SSD6693

23 June 2016

Diana Charteris
A/Team Leader - Resource Assessments
Planning Services
NSW Department of Planning and Environment
23 – 33 Bridge Street,
SYDNEY NSW 2000

Dear Ms Charteris

RYE PARK WIND FARM PROJECT (SSD 6693) RESPONSE TO SUBMISSIONS

Council acknowledges receipt of your correspondence dated 12 May 2016 advising the applicant had completed responses to the submissions raised during the exhibition of this project.

The opportunity to again provide comment is welcome on this major project is welcome. Further to Council's previous correspondence, the following comments are put forward for consideration in your assessment of the project.

Traffic

It is noted that a significant improvement in communication and consultation in relation to Council road requirements has taken place since the previous exhibition of the EA, and the parties have progressed discussions on appropriate road standards and required road and structure upgrades. Furthermore, the revised Traffic and Transport Assessment provides additional detail in relation to the type and numbers of vehicles expected for various aspects of the construction phase of the project and provides the basis for Council to properly consider impacts on road users and the local road network.

Of concern, however is the lack of identified sources of gravel for use on both internal and external road networks. Council is concerned that should a local gravel source close to the project be utilised, rather than existing commercial quarries situated some distance away, the transport of gravel could potentially utilise routes not identified in the Assessment. This would have a significant detrimental impact on road safety and the local road network in general. Similarly, as actual site accesses have not been confirmed, this has the potential to change the traffic volumes using any given route depending on the number and location of accesses.

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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.

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. Upgrades are required to be undertaken 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.

To ensure agreement is able to be reached with the proponents, noting that actual transport routes are not yet finalised, Council requests suitable conditions of consent be included to ensure agreement on the proposed road standards and extent of road upgrades is achieved and that Council approval of the Traffic Management Plan for the project is obtained prior to any works commencing.

Statement of Commitment

It is noted that many of the concerns raised by Council in response to the EA are addressed by the applicant by the provision of a statement of commitment. Council requests that the Department ensure that the statement of commitment is referenced as part of the consent in particular in relation to the establishment of a noise complaint hotline, decommissioning plan, disposal of waste, visual amenity and landscaping. Council is concerned that these matters, if not adequately addressed via conditions of consent, will fall to Council to manage and resolve. The scope of these matters, for a project of this scale, is outside of the scope of Council's capacity to manage effectively.

Gravel Sourcing

As indicated above Council has concerns that gravel material for the road upgrades and general construction will be sourced at a point closest to the facility site, which may not necessarily be licensed. Whilst the proponent acknowledges that any quarry from which material is sourced must have the appropriate approvals, Council requests that this be acknowledged as a condition imposed upon the consent.

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

Sharon Langman
DIRECTOR PLANNING