

9. TRAFFIC AND TRANSPORT

Director-General's Requirements

- the EA must assess the construction and operational traffic impacts of the project including:

1. Details of the nature of traffic generated, transport routes, traffic volumes and potential impacts on local and regional roads, bridges and intersections, including any proposed road upgrades and repairs; and
2. Details of site access roads including how these would connect to the existing road network and any operational maintenance and handover requirements.

9.1 SUMMARY OF OBJECTIONS

Traffic and Transport: Flyers Creek Wind Turbine Awareness Group (FCWTAG) objects to the Flyers Creek Wind Farm proposal:

- 9.1.1 There is no Transport and/or Traffic Management Plan in place, and provided for *public scrutiny as part of the Environmental Assessment*.
- 9.1.2 Similarly there is no Construction Environmental Management Plan in place.
- 9.1.2 There is insufficient detail about the rectification, maintenance and upgrade of local Council roads.
- 9.1.3 There is insufficient detail about the upgrading and construction of farm access tracks and how they will meet environmental standards.
- 9.1.4 Blayney Shire Council has responsibilities in the area of shire roads, waste and ratepayer amenity. Questions of critical interest to the welfare of Blayney residents and ratepayers are unanswered.

9.2 TRANSPORT AND TRAFFIC PLANNING

- 9.2.1 The Environmental Assessment (Chapter 13) does now contain a Traffic Management Plan. This is alluded to as being part of the post approval stage when a plan will

apparently be developed in consultation with Blayney Shire Council and the NSW Roads and Traffic Authority (RTA).

- 9.2.2 Why has this been omitted from the Director-General's Requirements (DGRs)? It is noted that Infigen's documentation for its Bodangora Wind Farm near Wellington contains a Traffic and Transport Strategy. Knowledge of both localities (Flyers Creek and Bodangora) predicates that the rural road network around the Flyer's Creek area is much more restricted in both terrain and road tortuousness.
- 9.2.3 Similarly there is no Construction Environmental Management Plan included in the Environmental Assessment, one that will be important when considering environmental impacts of constructing access tracks through farms sufficiently robust to take the transport of turbine parts by Restricted Access Vehicles. Sensitive planning will be required to account for steep grades, watercourse crossings (some permanent, some ephemeral), and with alignment restrictions.
- 9.2.4 **It is not acceptable that neither a Transport/Traffic Management Plan nor a Construction Environmental Management Plan is available for public comment as part of the Environmental Assessment.**

9.3 ROAD ROUTES TO FCWF WIND TURBINE SITES

- 9.3.1 There appears to be two grades of roads for consideration, once traffic has left the Mid Western Highway:
- (a) local, minor roads which are the responsibility for Blayney Shire Council to maintain. Estimated 80 kilometres. The Environmental Assessment does mention some road and corner widening but details are not reassuring. Infigen's assertion that roads will be left as they were found is also not reassuring since their present state in part is less than optimal and in fact often dangerous (sadly here has been a recent motor vehicle fatality, and one local bridge has been closed effectively blocking one of the local roads adjacent the FCWF).
 - (b) access tracks, mainly situated on farms. Estimated 37 kilometres. Infigen do refer to upgrading or constructing these. This is where the Construction Environmental Management Plan is critical, yet is omitted.
- 9.3.2 The history of energy companies' use of local roads during the turbine construction phase is poor. Drought or dry conditions in the Australian environment can make compliance easier because there is often little water flow through creeks and rivers,

and erosion of access tracks is easier to control. Over the last two years, with the breaking of a very long drought, there has been substantially higher rainfall. This has created problems for energy companies being unable to meet their conditions of consent. For instance, in June 2011 wind turbine construction traffic to the Macarthur Wind Farm in Victoria resulted in significant road damage due to heavy traffic. Potholes at least 20 cms deep over a 35 kilometre stretch of road were the consequence¹⁴. Consequently Moyne Shire is seeking to have the roads resealed by the energy company involved after construction is completed. Roads have become such an issue that Moyne Council has also refused to extend permits for the proposed Hawkesdale and Ryan Corner Wind Farm Projects. It seems that under the conditions of a State Significant Development (SSD) in New South Wales the local council (Blayney in this instance) would not have the same powers of veto. **It is the responsibility therefore of the Department of Planning to consider the road access by FCWF carefully with these critical aspects of road condition and use at the forefront. Therefore the Department of Planning and Infrastructure assume control of roads and transport by default.**

- 9.3.3 While there may be plans to be put in place with the RTA and Blayney Council, for the passage of RAVs along proposed routes, there is no guarantee that smaller vehicles (eg. concrete trucks, smaller delivery trucks) will not come by locally well known, more direct routes. Because there is no Traffic Management Plan in place there is no indication that this will be monitored, policed or otherwise managed in a safe and timely fashion.
- 9.3.4 Some of the local routes anticipated are patently inappropriate. Halls Road is a narrow, single track, gated country lane. Unless its ambiance and amenity were to be completely destroyed with the removal of significant trees and vegetation, there is no place for the passage of RAVs along Halls Road at all.

9.4 BLAYNEY SHIRE COUNCIL

- 9.4.1 From discussion with Council officers and Councillors there appears to be little depth of knowledge of the FCWF project and its ramification for Council and its ratepayers. It is known that consultations between Council and FCWF have not been significant or detailed.
- 9.4.2 Blayney Shire Council, as described above, is responsible for much of the road network involved in the construction and needs to have a detailed and intimate knowledge of the FCWF proposal before it can have an opinion on whether it is a desirable development for Blayney Shire Council. One assumes it has not been given

the opportunity. Certainly there is no indication that it has been involved to any great extent in the various management plans that will be required.

9.4.3 Blayney Shire Council has not made this FCWF proposal an item for significant and in-depth discussion at its Council meetings. There has been no resolution by the Council to, in principle, either support or oppose this proposal.

9.4.4 There are considerations for which Blayney Council seems not to have had the opportunity to consider, but which are pivotal to whether Blayney Council can absorb the impact of having such a large industrial complex present in the shire:

(a) Should the Council have been invited by either Infigen or the Department of Planning to have specific input into the Environmental Assessment? As it stands at the moment it seems that Council will be an “accessory after the fact” with no ability to have its opinion assessed by the public. While councils have no real input when the project is designated as a State Significant Development significance there is nevertheless an opportunity for them to make a real contribution to the planning phase when their local knowledge would be invaluable.

(b) The General Manager of Blayney Council suggests that Council will seek to have conditions imposed upon any Approval that may be granted by the Department of Planning. This is at best tenuous. Far better for Council to have had input in the first place and, as part of the EA, the public would be better able to assess the Council’s position regarding the proposal.

(c) Is there any mechanism whereby Council can impose monetary conditions on Infigen to cover ongoing road maintenance and other infrastructure costs which may impose a future tax burden on ratepayers, or indeed taxpayers in general? Has Council negotiated, or does it intend to negotiate, with Infigen an agreement about making good road conditions and supporting these with bonds or bank guarantees?

(d) Has Blayney Council conducted any surveys, studies or road compaction studies to determine their suitability for the traffic that will use them during construction? Moreover it is the responsibility of Council to consider roads in the context of a longer framework than the 18 months of construction. What is the long term context of road maintenance over the (say) next 20 or 30 years for local usage and tourist traffic?

- (e) Has Council given consideration to updating its Section 94 plan to accommodate industrial development such as a significantly large wind turbine complex?
- (f) Will there be implications for hosts to wind turbines? In view of the fact that they will receive income from an industrial source, the rating of the land should be changed from rural to industrial.
- (g) FCWF will impact on Blayney Council's services, general infrastructure (particularly roads) both during and after construction. What will be the provision for a Section 94 contribution or payment under a PVA? Noted is the fact that Muswellbrook Council charges a levy of 6.5cMT of coal extracted which is approximately 0.06% of coal value. A similar pro rate contribution should be negotiated with Infigen.
- (h) Council will need to consider the impact of its waste disposal facilities on waste (see Chapter 13) resulting from construction and eventually from the removal of the wind farm with all its constituent parts (including non recyclable and hazardous). Council should insist on some form of bond or similar security to ensure it does not inherit liabilities for which the Blayney ratepayers will ultimately be responsible. There is no indication in the EA that there have been negotiations of any sort with Infigen.
- (i) With this in mind there is also the question of the long term reliability of Infigen. This company has already sold its European energy interests (wind farms) and is attempting to divest itself of its interest in the USA. Moreover, an examination of the ASX share prices does not lend confidence as its share price has fallen by over 80% in the last 2 years. Council, with the support of the Department of Planning, should impose a bond or bank guarantee to ensure that the wind farm will be properly decommissioned and removed after its functional life span has been reached. This includes hazardous and non recyclable materials. Infigen has publicly stated that removal will be amply covered by the scrap material value but since this is 20-25 years in the future there can never be any degree of certainty of scrap metal and material prices, and to sell a project to host farmers on this basis in reality amounts to fraud. No consideration has been given to increases in labour costs over the same period.
- (j) The fact that Infigen opposes any sort of bond, imposed as a condition of consent, is a matter for great concern, and needs to be explained to the ratepayers by Blayney Council.**

(k) Notwithstanding the fact that Blayney Council may ultimately face the consequences of a derelict wind farm, despite all assurances to the contrary (the experience of the USA is salutary in this respect) it should be explained by Council and Department of Planning that the responsibility for removal by law, and failing all else, can fall to the individual wind turbine host. This responsibility has almost certainly not been imparted to any of the host farmers who have signed up to date. The considerable financial impost of removing a wind turbine, scrap prices notwithstanding, will make a mockery of any income received during the lifetime of a functioning wind turbine.