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Upper Lachlan Shire Council

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Our Ref: F11/243 and D2014/2097

Your Ref: MP 10_0053 - 90372624

28 May 2014

Major Projects Assessment
Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Tracy Bellamy

Dear Madam

**RE: ENVIRONMENTAL IMPACT STATEMENT – PALING YARDS WIND FARM –
MP 10_0053**

Reference is made to the invitation to provide a written submission to the Environmental Impact Statement for the Paling Yards Wind Farm proposal.

Upper Lachlan Shire Council (ULSC) has studied the Environmental Impact Statement and other documentation associated with the Paling Yards Wind Farm Development. Whilst Council acknowledges that the proponent plans to limit its use of the ULSC road network, Council has concerns that even this limited use proposal will have the potential to damage the road assets that are owned by the community in addition to posing a threat to the safety of existing road users.

Should the proponent reconsider this arrangement and decide to use the Upper Lachlan community's road assets, the following issues must be addressed:

1. Council is concerned that the information regarding Over Dimension, Over Mass and Heavy Haulage routes appears to be inconsistent. Council has sought advice from an experienced heavy haulage operator who considers that all of the routes favored in the report are long, unwieldy, have areas where the heavy haulage parameters would be exceeded (in terms of cross fall and longitudinal grades) as well as being uneconomical.

The comparison with B-Double routes is unrealistic as each type of vehicle is allowed to use (or restricted from using) particular routes depending on characteristics that are unique to each type of vehicle. The operation of vehicles carrying OD and OM loads is significantly different to both 19m and 26m B-Doubles (19m B-doubles have general access rights that allow them to travel on roads that are used by conventional semi-trailers). It may also be of significant benefit to the developer and the wider

community to upgrade the Abercrombie River Bridge, approaches roads and use MR256 for all vehicles to access the site.

Should the proponent wish to use the route involving MR256, ULSC will require that the Abercrombie River Bridge be replaced and the associated roadway upgraded as necessary.

2. ULSC is also concerned with the lack of commitment from the developer in relation to the route that is likely to be used for light traffic to access the site. The Transport Impact Assessment states that 85.9% of the personnel on site each day will travel from the Goulburn/Canberra area. Unfortunately, it fails to identify which route will be used by these people to access the site. Obviously, most staff will be seeking to use MR256 for this purpose.

ULSC has concerns regarding the use of MR256 as several areas of substandard road (pavement strength and alignment) exist between Taralga and the Abercrombie River. Table 4.1 of the T.I.A. assesses peak light traffic as being 120 movements per day; however this is assessed in one direction only. The base traffic is shown in two directions. Using this information after it has been corrected (multiplied by two), the light traffic on MR256 will almost double. Whilst, in absolute terms, the additional traffic may not cause problems with intersections and "traffic lights" and the road may have enough theoretical capacity, in relative terms the everyday existing users will have trouble in coping with these changes. This will be exacerbated when the existing traffic and development traffic will travel in opposing directions during the am and pm peaks.

This additional traffic has the potential to cause significant conflicts for users of the existing road network.

3. It may be necessary to impose speed limits on parts of the public road network to ensure that the interaction of construction traffic with existing traffic occurs in a safe manner.
4. ULSC acknowledges the proponents intention to connect to the Electricity Supply Grid via a local connection to the Mount Piper – Bannaby transmission line. It is assumed that any changes to this arrangement will require a modification application. Council will certainly be providing comments if this eventuates.
5. ULSC is concerned that the proponent has not identified potential sources for road making gravels, concreting aggregates, cement and reinforcing steel. The documents assume that these materials will be delivered to the site from the north, but fails to provide evidence to indicate how this will be achieved and policed.

Unfortunately, the transport of these materials has the greatest potential to damage the local road network (as well as reducing road safety for existing users). Viable

suppliers of these materials exist in Goulburn, Crookwell, Berrima and Canberra. In addition to this, the proponent may be able to source gravel for internal roadworks from roadside earthworks involved in improving MR 256 which could provide cost savings for the development as well as road improvements for the benefit of the community.

6. Council does not favour the utilization of "laser car" dilapidation reports in assessing the condition of the roads prior to and after construction. These reports are mainly suited to a broader assessment of a larger scale road network and lack adequate detail to identify smaller pavement repairs that may be required. Instead of this process, Council prefers to have a joint inspection and agreement that relies on photographs to identify pre-existing faults in the pavement.
7. The proponent shall be required to produce a Transport Management Plan before consent is granted. This is to ensure that the required due diligence (and appropriate consultation with stakeholders) has been carried out in relation to any transport issues that might arise.

For any further information or clarification please contact Council during office hours.

Yours faithfully



Tina Dodson

Director Environment and Planning

For

JK Bell

General Manager

Upper Lachlan Shire Council