

Reference: #15S1569000

25 May 2017

Crookwell Development Pty Ltd
c/- Global Power Generation Australia Pty Ltd
Suite 4, Level 3, 24 Marcus Clarke Street
CANBERRA ACT 2600

Attention: Mr. Shaq Mohajerani (Project Development Manager)

Dear Shaq

**RE: CROOKWELL 2 WIND FARM
RESPONSE TO SUBMISSIONS**

I refer to the Amended Application lodged with the NSW Department of Planning and Environment for the proposed Crookwell 2 Wind Farm, located approximately 25km northwest of Goulburn. Specifically, the below sets out a response to the following agency submissions:

- Upper Lachlan Shire Council letter 'Response to Crookwell 2 Wind Farm Modification and Crookwell 3 Wind Farm Amended Application' from Tina Dodson dated 14 November 2016.
- Email from Louise Wakefield (Goulburn Mulwaree Council) to Elle Donnelly (NSW Department of Planning and Environment) 'Crookwell 2 MOD and Crookwell 3 Wind Farms' dated 28 November 2016.
- Roads and Maritime Service letter 'Upper Lachlan Shire Council – DA 176-8-2004-1 – Crookwell 2 Wind Farm Development – Modification of Number and Size of Wind Turbines' from Chris Millet dated 7 November.

*Each of the relevant transport items from the above submissions has been reproduced (**in bold italics**) below with a response provided thereafter. The below responses should be read in conjunction with the GTA Report 'Crookwell 2 Wind Farm Blade Modification Transport Impact Assessment' dated 2 March 2016.*

Upper Lachlan Shire Council

"1. There is still no information regarding heavy haulage vehicles (vehicles over 4.5 tonnes and less than 42 tonnes) and what routes they will use. This is important as the road network in the area is particularly vulnerable to use by heavy vehicles. The roads would need to be upgraded before any work could commence. The roads are certainly not sound enough to start construction work (without reconstruction) and repair them at the end of the job. There is gravel quarries located to the north of the site – use of these will require a significant amount of reconstruction work. If the gravel is to be hauled from quarries south of the site (eg Goulburn), Woodhouselee [Road] will require upgrading from Crookwell Rd to the northern most access to the site."

The principal contractor (BMD Construction) is finalising their supply contracts for the earthworks material with various quarry operators in proximity to the site. The heavy haulage vehicles will bring material to the site from the designated roads south of the project site. Woodhouselee Road section from the intersection of Crookwell Road to the access entrance will service the eastern part of the project site. In accordance with the conditions of Development

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Consent in 2005 and the subsequent negotiations with Upper Lachlan Shire Council in May of 2009, and the following approval of the Pre-Construction Compliance Report by Department of Planning in June 2009, the Woodhouselee Road can be used by the project as per the approved Construction Environmental Management Plan (CEMP) for the Stage-1 that encompasses all construction activities other than the delivery of the Over-Dimensional Vehicles that requires a CEMP Stage-2 approval by Department of Planning and Environment. The use of the Woodhouselee Road and any other Public Infrastructure is subject to Condition 11(a) of the Development Consent that states 'The Applicant must repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development;' As such the Applicant must carry out regular inspections of the roads used by the development to ensure any damaged caused by the development is remediated as soon as possible.

Representatives from the Applicant (Crookwell Development Pty Ltd) undertook a general inspection of Woodhouselee Road, between Crookwell Road and the northernmost potential site access, on 1 February 2017. It is understood that their inspection identified that the section of Woodhouselee Road north of Crookwell Road that is designated to be used by the projects (8.4km for Crookwell 2 Wind Farm, and up to 11km for the Crookwell 3 Wind Farm northernmost access option) was generally in good condition and deemed to be of a standard capable of accommodating heavy haulage vehicles (it is understood that heavy haulage vehicles currently do use the Woodhouselee Road section although in much smaller volumes than required for the development), with only several locations identified with potholes / pavement defects that require minor remediation works in the near future to ensure that the road is functional for use by all vehicles.

Based on the above it is understood that the relevant roads can be used to service the heavy haulage requirement of the development in accordance with the Development Consent and subsequent approvals. It is recommended that the Applicant should perform regular inspection and monitoring of the Woodhouselee Road section from Crookwell Road intersection to the site access entrance, and undertake minor remediation works in response to damage caused by the development's use of the heavy haulage vehicles, noting that major reconstruction works of Woodhouselee Road (if required) will only be undertaken once by the Applicant, at the completion of construction of Crookwell 2 and 3 Wind Farms, this would provide the greatest long-term benefit for current and future users of Woodhouselee Road.

"2. The drawings show three accesses to Crookwell 3 East off Woodhouselee Rd. As the internal road network is completely interconnected, there should only be one sound access required."

Not relevant to Crookwell 2 Wind Farm Application, please refer to Crookwell 3 Wind Farm response report.

Goulburn Mulwaree Council

"The information provided about the heavy vehicle transport routes is insufficient, as is the detail around how the proponents intend to address the impacts of the construction traffic on the local road network. The current state of many of the roads identified in the application is not acceptable for the construction traffic generation related to the wind farm projects and it is Council's view that road upgrade works should be undertaken prior to construction commencing to the satisfaction of the Goulburn Mulwaree Council (and Upper Lachlan Shire Council) and then further works required to reinstate roads to a suitable standard once the construction phase is completed."

The Construction Environmental Management Plan (CEMP) for the Stage-1 was approved on 12th May 2009, this CEMP encompasses all construction activities other than the delivery of the Over-

Dimensional Vehicles that requires a CEMP Stage-2 approval by Department of Planning and Environment. Based on this approval the development traffic will go through the state roads in Goulburn (i.e. Sydney Road, Lagoon Street, Goldsmith Street, Fitzroy Street, Crookwell Road).

As part of the Crookwell 3 Wind Farm public exhibition process in 2013, the Council nominated the alternative route (i.e. Hume Street, Cowper Street, Clinton Street, Deccan Street, Fitzroy Street, Crookwell Road) for the development transport in particularly for the over-dimension vehicles. The Applicant's response for the Crookwell 3 Wind Farm was to use this alternate passage for both developments as the intersections along the alternate route was already augmented to accommodate other wind farm projects. In response to Council's comment that many of the roads identified in the application is not acceptable for the construction traffic generated, the Applicant will revert back to the original approved transport corridor on the state roads through Goulburn for the heavy haulage traffic, and will continue with the option for the Council's preferred alternate route for the over-dimensional vehicles.

The principal contractor (BMD Construction) is finalising their supply contracts for the earthworks material with various quarry operators in proximity to the site. We understand that one of the main quarry locations designated to service the construction phase is located on Crookwell Road, south of Woodhouselee Road, as such the heavy haulage vehicles for the development from this location will not be travelling through Goulburn therefore significantly reducing the potential for impact to road pavement in Goulburn. Currently other quarry site options are located south of Marulan and south-east of Goulburn. Given that several key routes in the local area (excluding Woodhouselee Road that is specifically discussed above) have been used for access to other wind farm construction sites, it is not anticipated that any significant works, other than those outlined for RAV access, would be required for the development.

It is recommended that the Applicant should perform regular inspection and monitoring of the Council roads used (if any), and undertake minor remediation works in response to damage caused by the development's use of the heavy haulage vehicles.

Roads and Maritime Services

The Roads and Maritime Services correspondence indicates that they do not object to the proposed development application in principle. In this respect, they do outline several conditions that it is assumed would be included in any Development Consent:

"Prior to the issuing of a construction certificate

- ***Prior to the issuing of the construction certificate, the developer shall enter into a Works Authorisation Deed (WAD) with the RMS for all works on Crookwell Road.***

Prior to traffic operating under the consent

- ***Prior to transporting any oversized or over mass loads, the applicant shall obtain a permit for an oversized and over mass load from the RMS Special Permits Unit in Glen Innes.***

The contact number is 1300 656 371.

It should be noted that the issue of a Special Permit may be subject to route and bridge assessment/s if deemed necessary by the RMS Special Permits Unit, as these issues have not been covered by the Traffic Impact Study (TIS). While the TIS has considered the length, width, height and turning radius requirements for over-dimensional loads/vehicles, no details have been given as to the expected weight of loads or axle loadings for the over-dimensional

movements. The maximum weight of loads associated with the subject development to be moved should be specified in the TIS.

- The Traffic Management Plan (TMP) shall be developed in consultation with RMS Southern Traffic Operations Unit, Upper Lachlan and Goulburn Mulwaree Councils' Local Traffic Committees (LTCs). The TMP (and associated Traffic Control Plans) shall be submitted to the Upper Lachlan Council LTC for final acceptance.
- A copy of the accepted TMP shall be forwarded to RMS (via development.southern@rms.nsw.gov.au) prior to any transportation occurring or works commencing on site for this development.
- Concept plans for all roadworks on classified roads identified as part of the accepted TMP shall be submitted to RMS for acceptance of the treatment type (via development.southern@rms.nsw.gov.au).
- Should the TMP identify further construction works required on any State classified roads, RMS approval will be required and may require the developer to enter into a Works Authorisation Deed (WAD) with RMS. The WAD would manage the design and construction of the works. If physical construction works on any State classified roads are identified, the details shall be forwarded to RMS for consideration in the first instance (via development.southern@rms.nsw.gov.au).
- All roadworks, traffic control facilities and other works associated with this development, including any modifications required to meet RMS standards, will be at no cost to RMS.
- All works shall be completed prior to occupation.
- All roadworks on classified roads shall be designed in accordance with Austroads Guide to Road Design - Part 4a: Unsignalised and Signalised Intersections and Austroads Guide to Road Design - Part 4: Intersections and Crossings General and RMS supplements.
- All roadworks and traffic control facilities on classified roads must be undertaken by a pre-qualified contractor. A copy of pre-qualified contractors can be found on the RMS website at:

<http://www.rta.nsw.gov.au/doingbusinesswithus/tenderscontracts/prequalifiedcontractors.html>
- RMS will be exercising its powers under Section 64 of the Roads Act, 1993 to become the roads authority for works on Crookwell Road. Given this, Section 138 consent under the Roads Act, 1993 shall be obtained from the RMS prior to construction.
- The developer shall apply for, and obtain a Road Occupancy Licence (ROL) from the RMS Traffic Operations Unit (TOU) prior to commencing roadworks on a State Road or any other works that impact a travel lane of a State Road or impact the operation of traffic signals on any road. The application will require a Traffic Management Plan (TMP) to be prepared by a person who is certified to prepare Traffic Control Plans. Should the TMP require a reduction of the speed limit, a Speed Zone Authorisation will also be required from the TOU. The developer shall submit the ROL application 10 business days prior to commencing work. It should be noted that receiving an approval for the ROL

within this 10 business day period is dependent upon RMS receiving an accurate and compliant TMP.

Note: An approved ROL does not constitute an approval to commence works until an authorisation letter for the works has been issued by RMS Project Manager.”

Primarily, the Development Consent conditions require the preparation of a Construction Traffic Management Plan and associated standard applications for the Crookwell 2 Wind Farm.

A Construction Environmental Management Plan (CEMP) Stage-1 was previously prepared to address the pre-construction conditions of the Crookwell 2 Wind Farm. The CEMP included a Construction Traffic Management Plan and Traffic Incident Management Plan. This CEMP was subsequently approved by the NSW Department of Planning on 12 May 2009.

In this respect, an updated Construction Traffic Management Plan for Stage-2 in respect to the delivery of the over-dimensional vehicles, similar to the one previously prepared for the site will be prepared in consultation with relevant road authorities. It is noted that details of axle loadings will be dependent on the specific vehicles/ configurations being used to transport turbine components. This would be appropriately addressed in the Construction Traffic Management Plan and RAV permit applications.

The Applicant acknowledges the conditions contained in the Roads and Maritime Services correspondence.

I trust the above appropriately responds to the submissions received. Naturally, should you have any questions or require any further information, please do not hesitate to contact me in our Sydney office on (02) 8448 1800.

Yours sincerely

GTA CONSULTANTS



Brett Maynard
Director