

Pottinger Wind Farm (SSD-59235464)

Changes to Conditions of Consent

Notes:

1. Not all conditions in the table below are replicated in full, only necessary parts of the conditions to demonstrate changes.
2. As a result of new conditions, re-numbering of conditions will be required/undertaken.
3. Minor grammatical, typographical and condition cross-reference corrections to conditions are not included in the table below.

Condition No.	Commission's Intended Outcome	Revised Condition (Additions in bold and underlined , deletions in strikethrough)	DPHI Comments
DEFINITIONS			
DEFINITIONS	To provide clarity about the wind monitoring masts included within the definitions of both "ancillary infrastructure" and "pre-construction minor works".	Ancillary infrastructure – All project infrastructure with the exception of wind turbines, including but not limited to collector substations, switching stations, permanent offices and compounds, underground and overhead electricity transmission lines, accommodation camps, communication cables (including control cables and earthing), permanent wind monitoring masts and internal roads	
	For all references to the BCA (Building Code of Australia) to be updated to NCC (National Construction Code).	BCA—Building Code of Australia National Construction Code means the current standard which applies at the time the relevant work is undertaken, published by the Australian Building Codes Board	
	Term not used in the conditions.	CEEC—Critically endangered ecological community, as defined under the BC Act or EPBC Act	
	Updated to reflect correct agency name.	The Energy Corporation of NSW	
	NEW DEFINITION Definition added to address possible staging of the development.	Final Layout Plan A plan prepared in accordance with condition C8	
	NEW DEFINITION Definition added to address possible staging of the development.	Interim Layout Plan A plan prepared in accordance with condition C10	
	To address the Applicant's concerns regarding pre-construction minor works.	Pre-construction minor works – Includes the following activities: <ul style="list-style-type: none"> • surveys; • overhead line safety marking; • building and road dilapidation surveys; • investigative drilling, excavation or salvage and geotechnical investigation works; • minor clearing or translocation of native vegetation; • establishing temporary site office (in locations meeting the criteria identified in the conditions of this consent) • installation of environmental impact mitigation measures, fencing, enabling works; • temporary wind monitoring masts; and • construction of minor access roads and minor adjustments to services/utilities, etc 	
PART A			
COMMUNITY ENHANCEMENT A19.	Defining VPA upon first use. Additional wording to capture any other agreement(s) of VPA terms offered by the Applicant and agreed to by either Council following determination. Note added regarding accordance with EP&A Act and EP&A Reg.	Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a Voluntary Planning Agreement (VPA) with Council in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of: (i) agreement between the Applicant and Hay Shire Council dated 11 April 2024 (as summarised in Appendix 3), or other such terms that may be offered by the Applicant and agreed to by Council; and (ii) agreement between the Applicant and Edward River Council dated 11 April 2024 (as summarised in Appendix 3), or other such terms that may be offered by the Applicant and agreed to by Council. <u>Note: Public notice of the VPA must be undertaken in accordance with EP&A Act and EP&A Reg.</u>	

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PART B			
LIGHTING B3.	Updated to latest version of the Standard.	(iv) complies with Australian/New Zealand Standard AS/NZS 4282: 2019 2023 : <i>Control of Obtrusive Effects of Outdoor Lighting</i> , or its latest version.	
	Hay Shire Council, as the aerodrome operator, should be party to all discussions and agreements.	<u>(f) consult with Hay Shire Council as the operator of Hay Aerodrome.</u>	
	Sentence removed, given that lighting would be installed in accordance with CASA's recommendations.	If there is a dispute about the need for aviation hazard lighting under condition B3(c), including which wind turbines are to be lit, then either party may refer the matter to the Planning Secretary for resolution.	
VARIATION OF CONSTRUCTION HOURS B7.	Consultation with Councils added to address Council concerns.	The hours of construction activities specified in condition B5 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be: ... (c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of notification of consultation with Councils (and notification of other relevant agencies) has been and will be undertaken; ...	
SOIL AND WATER WATER SUPPLY NEW CONDITION B18. (Recommended condition B18 becomes B19)	Proposed new condition to ensure the project's water needs are adequately sourced and supplied.	<u>Prior to the commencement of any construction the Applicant is to prepare a Water Sourcing Plan in consultation with the Water Group and relevant local Councils which details:</u> a) <u>the project's water requirements, including the water required for each stage of construction and all potable water needs;</u> b) <u>sources of water to be utilised;</u> c) <u>any licencing requirements pursuant to the Water Act 1912 and/or Water Management Act 2000 and timing of obtaining such licences;</u> d) <u>measures to mitigate excessive water consumption/use during construction;</u> e) <u>monitoring and reporting of bore water use; and</u> f) <u>measures and failsafe mechanising to be implemented should water sourcing availability change during construction;</u> <u>The Applicant must implement the Water Sourcing Plan.</u>	
NEW CONDITION B20.	Proposed new condition to ensure the correct assessment and approval process is followed for any potential aquifer interference.	<u>Aquifer Interference</u> <u>B20. Prior to commencement of any construction, the Applicant must confirm whether the development would constitute aquifer interference based on the findings of groundwater characterisation to be undertaken at the site. If interaction with groundwater is expected to occur, the Applicant must prepare and submit a hydrogeological assessment under the NSW Aquifer Interference Policy 2012 to the Water Group and obtain any necessary aquifer interference approval(s) pursuant to the Water Management Act 2000.</u>	
NEW CONDITION B21. (Recommended condition B19 becomes B22, etc.)	Proposed new condition considered prudent to ensure potential soil and erosion impacts are mitigated and controlled.	<u>Soil and Water Management Plan</u> <u>B21. Prior to commencing any construction, unless an environmental protection licence is already in place for the development, the Applicant must prepare and implement a Soil and Water Management Plan for the development in consultation with the Water Group. The plan must:</u> a) <u>be prepared by a suitably qualified and experienced person;</u> b) <u>include a soil erosion monitoring program to monitor impacts on the site, with results to be made available on the Applicant's website in accordance with condition C19 (Access to Information);</u> c) <u>include a description of the measures that would be implemented to achieve the objectives of condition B26;</u> d) <u>include a program to monitor and report on the effectiveness of these measures; and</u> e) <u>include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</u>	
HERITAGE TEST EXCAVATIONS B34. (Recommended condition B31.)	To address the Applicant's concerns and its submission to the Commission (on 1 July 2025 – linked here) that its heritage consultant has confirmed that there will be opportunities to revise the draft	Prior to carrying out any works associated with the development that could directly or indirectly impact the heritage items identified in condition B30, the Applicant must undertake test excavations including: ...	

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	Archaeological Research Design and Test Excavation Methodology to provide an improved outcome.	(d) in accordance with the draft Archaeological Research Design and Test Excavation Methodology (6 December 2024) or another research design and test excavation methodology agreed in consultation with the Planning Secretary and Heritage NSW.	
TRANSPORT STRATEGY B39. (Recommended condition B36.)	(d): To ensure that all structures, including stock grids, are appropriately assessed. (f): To consider impacts on existing enterprises and agricultural operations, <i>And</i> To ensure that impacts to opposing and following traffic is appropriately managed if an alternative haulage route is selected.	Prior to transport of high-risk heavy vehicles requiring escort, the Applicant must prepare a Transport Strategy to the satisfaction of the Planning Secretary. The Transport Strategy must: ... (d) include bridge and culvert an assessment of bridges, culverts, stock grids and other structures that may be impacted by heavy vehicles to ensure that bridges and culverts such structures can accommodate heavy vehicles requiring escort associated with the development; ... (f) include a protocol to manage impacts to opposing and following traffic on the Barrier Highway and the Cobb Highway, particularly traffic relating to agricultural and other industries , between Wilcannia and Hay (or any other relevant roads as part of the transport route) during transport of high-risk heavy vehicles requiring escort;	
TRANSPORT STRATEGY B40. (Recommended condition B37.)	Transport of items to site may not require an escort, however, could require approval by the relevant road authority.	Prior to the use of heavy vehicles requiring escort on the public road network, all relevant approvals must be obtained and road upgrades be constructed (including for any road upgrades that may be required from port of origin to site).	
ROAD UPGRADES B41. (Recommended condition B38.)	To ensure road upgrades achieve Austroads Guide to Road design standards.	Unless the Planning Secretary agrees otherwise, the road upgrades identified in Table 1 of Appendix 5 must be implemented to minimum Austroads Guide to Road design by the Applicant in accordance with the relevant timing requirements, to the satisfaction of the relevant road authority.	
ROAD UPGRADES B42. (Recommended condition B39.)	Sentence about the standard of road upgrades added to address Council concerns.	The road upgrades identified in the Transport Strategy in condition B39 must be implemented in accordance with the responsibilities and the relevant timing requirements, to the satisfaction of the relevant road authority. The standard of any upgraded road upon completion of construction must be agreed with the relevant road authority in the development of the Transport Strategy.	
TRANSPORT MANAGEMENT PLAN B45. (Recommended condition B42.)	To ensure coordination of transport scheduling and minimise cumulative impacts of wind farm developments in the SW REZ. <i>And</i> To ensure that impacts to opposing and following traffic is appropriately managed if an alternative haulage route is selected. <i>And</i> To capture all possible weather conditions.	(a) details of the haulage routes s to be used for all development-related traffic; ... (c)(vi) minimising potential cumulative traffic impacts with other State significant development projects along the access route during construction, including consultation and scheduling transportation of the development's turbines and all other construction materials with TfNSW regarding their projects; ... (vii) minimising potential disruption to primary production/agricultural activities and local traffic movements along the transport route; ... (xiv) <i>(formerly xiii)</i> a protocol to manage impacts to opposing and following traffic on the Barrier Highway and the Cobb Highway between Wilcannia and Hay (or any other relevant roads identified in the Transport Strategy) during transport of high-risk heavy vehicles requiring escort; ... (xvi) <i>(formerly xv)</i> responding to local climate conditions that may affect road safety such as fog, dust, wet/ inclement weather and flooding;	
AVIATION NOTIFICATION OF AVIATION AUTHORITIES B48. (Recommended condition B45.)	This change has been made given correspondence provided by the Applicant from Airservices Australia (linked here) that confirms a 7-moth lead time is not required, and to address Council concerns.	At least 7 months Prior to the commencement of construction of any wind turbine or wind monitoring mast, the Applicant must consult with Airservices Australia to secure a commercial agreement for amendments required to air routes H247 and W762, and the Hay aerodrome 25 nm MSA instrument procedure, and consult with Hay Shire Council regarding the 25 nm MSA procedure. The Applicant must provide evidence to the Planning Secretary that the commercial agreement is in place.	
HAZARDS OPERATING CONDITIONS – ACCOMMODATION CAMP B56.	To address Council concerns that it should be notified and the local emergency management committee should be informed of the construction activities prior to and during the works.	For the accommodation camp, the Applicant must: ... (d) notify the local Council and the relevant local emergency management committee following prior to and on completion of construction of the development, and prior to commencing operations.	

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<i>(Recommended condition B53.)</i>			
EMERGENCY PLAN B57. <i>(Recommended condition B54.)</i>	To address Council concerns that the local emergency management committee needs to be informed of the construction activities prior and during the works, <i>And</i> Ensure council is provided with a copy of the Emergency Plan.	Prior to commencing construction of the wind farm (including the accommodation camp) and commissioning of the battery storage, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, including an evacuation plan for the accommodation camp, in consultation with <u>the relevant local emergency management committee</u> , RFS and the NSW State Emergency Service, and provide a copy of the plan to the local Fire Control Centre, and FRNSW <u>and local councils</u> .	
WASTE B59. <i>(Recommended condition B56.)</i>	Additions to the recommended condition to ensure (a) a Waste Management Plan is prepared in consultation with relevant Councils to manage waste disposal in a way that does not burden Council's waste facilities, and (g) ensure an agreement is in place with Council if required, as requested by Hay Shire Council.	The Applicant must: a) <u>prepare and implement a Waste Management Plan prior to commencing construction which must:</u> (i) <u>be prepared in consultation with Hay Shire Council, Edward River Council and Energy Corporation NSW;</u> (ii) <u>be consistent with the EIS;</u> (iii) <u>identify opportunities to maximise recycling of wind turbine related waste;</u> (iv) <u>identify appropriately licensed waste and resource management facilities at which waste disposal and recycling will take place;</u> (v) <u>identify the location and method of storing lithium-ion batteries if immediate recycling is not possible; and</u> (vi) <u>include a description of the measures that will be implemented to ensure that the objectives of condition B59(b)-(g) below are achieved;</u> b) minimise the waste generated by the development; c) classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version); d) store and handle all waste generated on site in accordance with its classification; e) not receive or dispose of any waste on site; f) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal; and g) <u>if Council waste facilities are to be used, enter into a Waste Management Agreement with the relevant Council.</u>	
ACCOMMODATION CAMP B61. <i>(Recommended condition B58.)</i>	To address Council concerns that the local emergency management committee needs to be informed of the construction activities prior and during the works.	Prior to commencing construction of the accommodation camp, the Applicant must prepare an Accommodation Camp Management Plan in consultation with Council. Unless the Planning Secretary agrees otherwise, the plan must: ... (f) include measures to provide the camp with health and medical services and to notify the relevant health authorities <u>and local emergency management committee</u> of the final measures; and	
ACCOMMODATION AND EMPLOYMENT STRATEGY B62. <i>(Recommended condition B59.)</i>	To address Edward River Council's request that the Applicant investigate legacy housing, such as adaptive reuse of short-term housing and invest in longer-term community housing.	Prior to commencing construction, the Applicant must prepare and implement an Accommodation and Employment Strategy for the development in consultation with Councils, and to the satisfaction of the Planning Secretary. This strategy must: ... <u>(e) investigate options for providing accommodation that could be repurposed to provide future long-term housing in the community.</u>	
	To address Edward River Council's request that it be provided with a copy of the strategy. Hay Shire Council has also been included for completeness.	The Applicant must provide a copy of the Accommodation and Employment Strategy to the Planning Secretary <u>(and to Hay Shire Council and Edward River Council following endorsement by the Planning Secretary)</u> , prior to commencement of construction, and implement the plan throughout construction and operation of the accommodation camp.	
DECOMMISSIONING AND REHABILITATION	Heading change (above recommended condition B60)	Rehabilitation Objectives – <u>Accommodation Camp</u> Decommissioning	
DECOMMISSIONING AND REHABILITATION REHABILITATION OBJECTIVES – TABLE 2	To require the investigation of repurposing of infrastructure.	Add dot-point to 'objective' column: • <u>Repurpose accommodation camp infrastructure where possible to service surrounding developments, and/or be reused by Council within the wider community</u>	

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NEW CONDITION B64.	The Panel finds that a detailed decommissioning and rehabilitation plan is prudent in consideration of the scale of the project.	<u>Decommissioning and Rehabilitation Plan</u> <u>Within 3 years of the commencement of operation, the Applicant must prepare a Decommissioning and Rehabilitation Plan for the development, including progressive rehabilitation in accordance with condition B63. At a minimum, the plan must be updated by the Applicant after 15 years into operation and within 2 years prior to decommissioning. The plan must:</u> a) <u>be prepared in consultation with the Planning Secretary and Councils;</u> b) <u>include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 3; and</u> c) <u>be prepared consistent with relevant local and State strategic land use planning documents applicable to the site</u> d) <u>describe the measures that would be implemented to:</u> (i) <u>decommission the development and rehabilitate the site in accordance with the objectives in Table 3;</u> (ii) <u>minimise and manage the waste generated by the decommissioning of the development;</u> (iii) <u>identify any site contamination issues arising as a result of the development (if any) and how this contamination will be remediated, including details of any approvals which may be required;</u> (iv) <u>include a program to monitor and report on the implementation of these measures against the detailed completion criteria;</u> (v) <u>ensure that best practice is employed in respect of utilising available recycling technologies.</u>	
B65.	Addition of a new heading above condition B65 for clarity.	<u>Rehabilitation Objectives – Development Site</u>	
PART C			
ENVIRONMENTAL MANAGEMENT C1.	Reinforce the need to keep the community informed.	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: ... (d) <u>include an ongoing community communication plan that</u> sets out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development, <u>including how often and when information will be made available;</u> ...	
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS C4.	The basis for this condition is unclear. The Commission considers that condition C3 provides the mechanism. The Commission is seeking the Department's consideration of if the deletion of this condition would have unintended consequences.	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	
NOTIFICATIONS NOTIFICATION OF DEPARTMENT C7.	Inclusion of Council for notification. Removal of sentence and replacement with proposed new conditions C9 – C12 (refer below).	Prior to commencing the construction, commissioning, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the <u>Councils and</u> Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	
FINAL LAYOUT PLANS C8.	This is considered prudent to ensure there are minimal rural landscape and stormwater impacts. The condition will also assist the subsequent certification process by specifying a 'final' set of drawings.	h) (d) showing comparison to the approved layout; <u>and</u> i) (c) the final design and layout of the battery energy storage system, including the following information: (i) site plan(s); (ii) elevations; (iii) a schedule of proposed materials, colours and finishes (noting that colours should, if practicable, comprise of muted tones complementary with the surrounding rural landscape and material which are non-reflective);	

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		<p>(iv) a stormwater drainage report and plans prepared by a suitably qualified and practicing hydraulic engineer consistent with the conditions of this consent; and</p> <p>(v) design details that demonstrate consideration of articulation, modulation and visual screening.</p> <p>The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.</p>	
NEW CONDITION C9 – C12.	<p>Given that EnergyCo have granted the Applicant access to the electricity grid for a maximum of 832.1 MW (and not the full 1,300 MW capacity sought by the Applicant), the Commission understands that the Applicant may choose to stage the project to meet the current access granted.</p> <p>The Commission notes that in its submission to the Commission dated 12 June 2025 (link) the Applicant sought changes to the Department's recommended conditions to facilitate project staging.</p> <p>The proposed new conditions are intended to allow the Applicant to stage the development of the project in a way that minimises environmental impacts whilst delivering a practical layout.</p>	<p><u>Staging of development and Interim Layout Plans</u></p> <p><u>C8. Instead of complying with condition C8, the Applicant may instead carry out the development in stages. Each stage of the development must be designed to minimise environmental impacts to the greatest extent practicable, including avoidance of Plains Wanderer habitat where feasible.</u></p> <p><u>C9. Prior to each proposed stage of the development, the Applicant must:</u></p> <p>a) <u>notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage;</u></p> <p>b) <u>submit a detailed Interim Layout Plan of the stage of the development to the Department via the Major Projects website that, to the extent relevant to the stage, complies with the requirements of a Final Layout Plan under condition C8; and</u></p> <p>c) <u>provide the Department and each Council a schedule of which road upgrades referred to in Table 1 of Appendix 5 relate to the relevant stage.</u></p> <p><i><u>Note: The provision of the schedule of road upgrades under condition C9(c) does not change the timing requirements under Table 1 of Appendix 5, but may inform the Planning Secretary's discretion under condition B41 to agree to alternative timing for the road upgrades.</u></i></p> <p><u>C10. The Applicant must ensure that each stage of the development is constructed in accordance with the Interim Layout Plan for that stage.</u></p> <p><u>C11. If the Applicant stages the development under condition C8, any reference to the Final Layout Plans in these conditions of consent is taken to be a reference to an Interim Layout Plan.</u></p>	
INCIDENT NOTIFICATION C13.	Council should be advised of any incidents.	The Applicant must notify the Department <u>and the relevant Council</u> within 24 hours of becoming aware of an incident. The notification must be made via the NSW planning portal (Major Projects) and address details of the incident including...	
APPENDIX 8 – INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	Council should be advised of any incidents.	1. All incident notifications and reports must be submitted via the NSW planning portal (Major Projects) <u>and to the relevant local council.</u>	

CLARIFICATIONS

The Commission is seeking clarification from the Department about the following conditions:

Condition No.	Commission’s Question	DPHI Comments
MICRO-SITING RESTRICTIONS A8(b).	Why has a micro-siting distance of 300 metres from the relevant GPS coordinate been proposed? The Commission notes that recommended conditions for other recent wind farm applications allow for micro-siting only up to 100 metres.	
A19. <i>AND</i> APPENDIX 3 GENERAL TERMS OF THE APPLICANT’S VPA OFFER	<p>Comment from Edward River Council:</p> <p><i>“Council notes that one of the general terms of the VPA offer is that 20% of the funding for the first five years of the project is to be spent within 20km of the site. Due to the remote nature of the site, it is unlikely that there are projects within this 20km radius that warrant the expenditure of the approximately \$2.2M in funding that would be available under this condition. Council requests that requirements regarding expenditure of funds under the VPA are included in the governance structure to be determined between Council and the Applicant.”</i></p> <p>The Commission would like to allow for this flexibility. Could the Department please advise how this could best be achieved (i.e. amending A19 to: “...or other such terms that may be offered by the Applicant and agreed to by Council”).</p>	
VISUAL IMPACT MITIGATION B1.	<p>Condition B1 requires the Applicant to implement visual impact mitigation measures if requested by the owner of any non-associated residence within 5.5 km of any wind turbine. Given the limited number of receivers within the 5.5 km boundary, and following statement from the Department’s Assessment Report (Executive Summary, page iii), is Condition B1 required?</p> <p><i>There are two non-associated receivers located within 5.5 km of the nearest proposed turbine (within the blue line of the Visual Assessment Bulletin). These dwellings benefit from distance and screening from existing mature vegetation between viewpoints and the project site. The visual performance objectives set out in the Wind Energy Guideline and associated Visual Assessment Bulletin are achieved at all receivers.</i></p>	
BIODIVERSITY OFFSETS B27. <i>(Recommended condition B24)</i>	Please clarify the difference between conditions (a) and (b). Has this condition been recommended by a government agency?	
TRANSPORT STRATEGY B39. <i>(Recommended condition B36)</i>	Given that the transport route for heavy vehicles requiring escort is proposed to originate from the Port of Adelaide, is coordination or consultation with South Australian agencies required?	
	<p>Hay Shire Council have requested that this condition be amended to include any road that may be impacted as a result of the development (not restricted to the transport route). Is the Department confident that impacts to local roads from regular use by Project vehicles (such as water carts etc) can be addressed through the Transport Strategy?</p> <p>Similarly, would the bridge and culvert assessment required by (d) also consider impacts to local roads by heavy vehicles associated with the Project.</p>	
TRAFFIC MANAGEMENT PLAN B45. <i>(Recommended condition B42)</i>	<p>Comment from the Applicant:</p> <p><i>Condition B42 requires a Traffic Management Plan to be in place prior to commencing road upgrades identified in B38. We are supportive of providing a Traffic Management Plan, but it should be required prior to Commencement of Construction. The current requirement which states 'Prior to commencing road upgrades' could delay performance of certain road upgrades.</i></p> <p>Could the Department please advise if this timing is appropriate?</p>	
NOTIFICATION OF AVIATION AUTHORITIES B48. <i>(Recommended condition B45)</i>	What are the impacts to the Project if the Applicant cannot “secure a commercial agreement for amendments required to air routes” with Airservices Australia?	
APPENDIX 5 HAULAGE ROUTE AND ROAD UPGRADES	Regarding the ‘timing’ in Table 1, where have these timeframes come from? Were the councils consulted in this?	