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16 August 2023

Natasha Homsey
Planning and Assessment Group
Department of Planning and Environment,
Locked Bag 5022
Parramatta NSW 2124

Natasha.homsey@planning.nsw.gov.au

Dear Ms. Homsey,

Submission in Response to the EIS on the Spicers Creek Wind Farm (Application No SSD-41134610)

1. Introduction

Thank you for the opportunity for Warrumbungle Shire Council ('Council') to table this Submission in response to the EIS for the proposed Spicers Creek Wind Farm Project ('Proposal') near Dunedoo, NSW. The Proposal will be located partly within the Warrumbungle Local Government Area (LGA) and has physical and socio-economic consequences for Council to manage.

It is understood that the Project involves the establishment and operation of a wind farm and associated infrastructure including:

- A Capital Investment Value of approximately \$2 billion.
- 117 wind turbines (700 MW total generation capacity) and supporting infrastructure spread across the suburbs of Elong Elong, Goolma, Gollan and Dunedoo.
- Turbine specifications: tower height of 170m, blade length of 85m, maximum tip height of 256m and engine power ratings of 6MW - 6.2MW.
- Up to three Substations (250m x 250m) located across the southeastern portion of the project site and connection to the Central West Orana REZ Transmission Line.
- Electrical connections between the proposed wind turbine generators ('WTGs') and substations and battery storage facility consisting of a combination of underground cables and overhead powerlines.
- Underground and overhead 33 – 330kV reticulation (30m – 60m easement) connecting the turbines to the substations (total length above ground is un-specified).
- An overhead high voltage transmission line (132 - 330kV) with a clearance corridor of 45m - 60m connecting the wind farm to the existing 330kV and proposed 500kV Central West Orana Renewable Energy Zone Transmission Line.

- Two battery energy storage systems (BESS) with a potential capacity of 400MW, up to 1,800 MWh of storage.
- Approximately a three-year construction phase (approximately 40 months).
- Total development footprint of operational infrastructure of 1,520 ha.
- Broader Project Site of approximately 17,731 ha.
- An operational lifespan of 30 years.
- Approximately 323 full-time employees on average during the construction phase with a peak of 587.
- Approximately 12 full-time employees during the operation and ongoing maintenance of the wind farm.
- Fifteen temporary on-site concrete batching plants (200m x 100m each) during construction.
- Un-specified number and size of quarries.
- 4 meteorological masts 200m high.
- Three construction compounds (1 ha each).
- Fifteen laydown areas (2 ha each)

Council is of the view that the EIS for this project requires a higher level of detail regarding the likely impacts on community assets and services and how those impacts are to be mitigated. This Submission outlines the matters of concern to Council.

Presently, while the overall potential economic benefits for the region are acknowledged and supported, based on the current level of information provided in the Environmental Impact Statement (EIS) Council has significant concerns with the likely impacts the proposal would have on community assets which Council manages, including:

- Infrastructure assets such as (but not limited too) roads, waterway/drainage structures, water supply and sewerage networks, which are not designed to cater for the large peak demands likely to arise across the region due to the project (both individually and cumulatively with other projects), risking significant deterioration in asset condition and capacity over the project lifetime. If not managed and compensated, these would in turn cause large adverse adjustments for both the maintenance and capital renewal aspects of Council's financial operations.
- Sporting facilities and recreational grounds including swimming pools, grassed recreational parks and gardens.
- Other financial budgets which would be required to fund administration, verification, and compliance activities to extend services to the temporary but large increase in local population and manage the impacts of the SSD if approved. These would include for example verification of public road works condition, construction, and maintenance in relation to the project, to manage long term health and safety, environmental and quality risks.

The proponent is negotiating a draft Planning Agreement (PA) offer with Council which may mitigate the concerns outlined in this letter if enacted together with a range of infrastructure treatments and management measures to be secured as part of the SSD consent. Any PA would need to be agreed prior to determination of, and incorporated as a legal requirement of, the SSD consent. Until such time as a PA and the required management measures and infrastructure treatments are secured, Council objects to the proposal.

The reasons for this objection are set out below and in the **Attachment A – Roads**. An objection may be withdrawn by Council upon satisfactory arrangements being made to address these concerns, prior to SSD determination.

2. Overview Comments

Whilst Council is generally supportive of renewable energy initiatives, it has concerns about the Proposal, arising in part from the inadequacy of the information contained in the EIS.

The various concerns are outlined in this submission. It is because of these unresolved and significant concerns that Council hereby lodges an objection to the Proposal.

The prospect of Council subsequently reviewing its objection is dependent on whether the Proponent and DPE actively and substantively engage with Council to address, to Council's written satisfaction, the concerns listed herein.

Council, its residents and ratepayers and community groupings, need to be satisfied beyond doubt that the environmental, social, and economic features and attributes of the Warrumbungle LGA in general, and the local communities, towns, and rural districts in particular, will be safeguarded. A priority consideration is that the Council needs to be able to feel confident that environmental, social, and economic costs will not be outsourced by the Developer onto the residents and ratepayers of the Shire.

The salient matters that require satisfactory resolution include:

1. Identification of the definitive details regarding accommodation of the construction workforce;
2. The scope and extent of construction activity and relevant safeguards;
3. Demonstration by the developer that traffic control and physical road works can be practically achieved prior to SSD approval.
4. The developer, prior to SSD determination, providing a traffic management statement of commitments outlining the key outcomes that will ensure impacts are appropriately managed, including consideration of active monitoring and management methods.
5. Firm commitments by the developer demonstrating commitment towards implementing and managing light vehicle movements to and from site. For instance, will buses be used, with a ban on the use of light vehicles?
6. More transparent, comprehensive information regarding the road and traffic impacts on local roads and the consequences for road and intersection upgrades on local roads, to the satisfaction of Council as the Roads Authority. See details elsewhere in this Submission.
7. The developer addressing what appears to Council to be an underestimation of construction material quantities and thus the number of heavy vehicle movements required, as detailed in **Attachment A**.
8. Confirmation by the developer of the locations of facilities unconfirmed in the EIS as detailed in section 7 (of this submission).
9. The Proponent funding the upgrading of potentially impacted local roads to the standard required by the Roads Authority, namely Council.
10. The provision of annual, ongoing financial contributions to cover the cost of road repairs and maintenance over the life of the project (to be addressed in the PA), including the decommissioning phase.
11. Progressing the negotiations on a Planning Agreement to a satisfactory conclusion.
12. Definitive quantification of and commitment to the number of construction and operational jobs that will be secured by locals, and training/upskilling to be provided. Council is happy to discuss.
13. Details of the source of water, sand and gravel required for the construction phase; and
14. Definitive actions to enhance positive social cohesion between the proposal and the local community.

The above-mentioned items are further addressed below.

3. Workforce Impacts

There are inconsistencies in the information provided regarding the likely workforce size which materially affect assessment of other project impacts. An average 320 Full Time Equivalent (FTE) direct local jobs are forecast by the proponent (EIS section 2.7) to be employed over the 40 months' construction phase for the 117 Wind Turbine Generators (WTGs), onsite and offsite civil and electrical works. At peak the workforce is forecast to number around 487 persons (EIS 6.11.3.1).

For comparison the proponent's Bango Wind Farm (WF) was completed in 2023 and, according to information in the EIS (s. 6.11.3.1), the proponent's website and the DPE major projects website, that project had a peak workforce of 320. Bango WF project was approved with 46 WTGs, each rated for an average 5.3 MW generation capacity (244 MW total) and was reported to have been constructed over 3 to 4 years (late 2019 to 2023).

The Spicers Creek WF is proposed to have around 2.5 times both the number of turbines (117 WTGs) and the peak generation capacity (700 MW), being turbines of a similar, somewhat larger, size. How can it be explained that the peak construction workforce would only be 50% larger (and for a short period of 6 months only before reverting to average headcount of 320) but is expected to deliver the project within a similar construction duration around 3.5 years? Publicly available metrics for other comparable major wind farms in NSW also indicate a larger scale construction phase may be likely. It appears the likely workforce numbers required onsite are significantly understated with potentially major impacts, particularly for (among other areas) workforce peak hourly vehicle trips in the local area of the site, workforce accommodation demand and locations, and sewage disposal, each as discussed in this letter and all in the context of cumulative impacts with other renewable projects that may likely have construction underway at the same time.

4. Construction Impacts

It is understood from the EIS that the Proposal, as has been assessed, will have a relatively large construction footprint of 17,731 ha to allow for micro siting and an operational footprint of 1,520 ha.

Consequently, the likely physical impacts during construction will be significant. These physical impacts will then create potential environmental, visual, and related impacts and costs.

Council seeks more detailed information on matters including the scope and extent of earthworks, road works, drainage and erosion protection aspects associated with access roads, temporary batching plants, temporary and permanent site infrastructure (e.g., laydown, parking areas, construction offices, etc.) and the turbines themselves. Also, the management of potential environmental impacts on water quality, noise, dust, First Nations Country, flora, and fauna.

5. Road and Traffic Impacts

Council is the Roads Authority generally for classified and local roads within Warrumbungle Shire (other than Crown roads). Under Sections 87, 122, 138 (and others) of the *Roads Act 1993*, before any traffic control or physical works can commence on these roads, the developer must provide details and obtain consent from Council. While detailed design applications can and should be deferred until after SSD consent is obtained, it must be shown that the measures and works can be practically achieved prior to SSD approval.

Note: The Golden Hwy is a State classified road and Transport for NSW has care and control. That authority may choose to exercise approval functions in relation to the Golden Hwy as the Roads Authority under Section 64.

Council supports the proposal in-principle to limit project site access to specific local roads in the Elong Elong locality west of Sandy Creek. Council is the Roads Authority for Spring Ridge Rd, Sandy Creek Rd, Dapper Rd, and other local roads generally bounding the site near its eastern boundary. These roads have not historically been built or maintained to a safety standard or level of service that would be required to accommodate the large number of project commuter (light vehicle) and heavy vehicle movements. Council will be seeking from the DPE consent conditions that place

the burden of proof on the Developer to demonstrate that other, non-specified roads are not used by Project-related traffic.

To illustrate, if the project were to proceed with use of Spring Ridge Rd and other Council local roads, which represents the shortest travel time for traffic between the southern parts of the project site and the Golden Hwy and Newcastle, preliminary estimates suggest Council may suffer economic damage in the order of tens of millions of dollars over the entire project lifecycle from the construction phase through to end of decommissioning. This estimate range encompasses sealed and unsealed road maintenance and rehabilitation costs attributable to project traffic, estimated generally using principles from the global best-practice pavement damage model set out in Austroads Guide to Pavement Technology.

In contrast, by concentrating movements to the designated access points directly off the Golden Hwy and Saxa Rd (by agreement with Dubbo Regional Council), impacts on other Warrumbungle Shire Council-maintained roads would be vastly reduced. Substantial maintenance and other impacts on Council's roads are still expected and will require mitigation and management. The draft PA offer under negotiation with the proponent will be central in ensuring these financial impacts are substantially addressed. Council requests the further information and commitments set out in **Attachment A** to this letter.

It is critical that the proponent provide firm commitments prior to SSD determination to ensure Warrumbungle Shire Council local roads in the vicinity of the site will be actively avoided (except in emergencies or as agreed with Council). While it is appropriate to defer the need for detailed management plans to after SSD determination, the EIS discussion is aspirational and contains no enforceable undertakings. Prior to SSD determination, a traffic management statement of commitments is to be prepared outlining the key outcomes that will ensure impacts are appropriately managed. These should include consideration of active monitoring and management methods such as (for example):

- Provision of dilapidation surveys to capture the existing roads condition (including restricted roads) immediately prior to project construction commencement,
- Technological methods, which may include each workforce and heavy vehicle fitted with GPS with geofencing and notifications to site management,
- Surveillance equipment on key prohibited access routes and a register of project licence plates,
- Infrastructure treatments which may potentially range from signage to awareness or exclusion devices or barriers (while maintaining public right of access),
- Quotas for private vehicle trip reductions, which should include maximisation of carpooling as far as practicable, and provision of shuttle buses where sufficient workers are co-located along the same route to/from accommodation centres.
- Any measures to manage the cumulative impacts with multiple other major projects planned in the area, to ensure that project traffic impacts can be reasonably apportioned between developers without excessive compliance burden being placed on Council,
- Lodgement of bond securities to guarantee performance of obligations,
- Summary compliance reports being provided to Council on a regular basis with details of actual number of movements and vehicle types/loads that comprised each movement, and
- Provision for compensatory pavement maintenance payments to be accrued annually in proportion to the rates of non-compliance (under the VPA) in line with Austroads best-practice pavement models,
- As well as soft behaviour-influencing management measures such as training and toolbox meetings which would normally be covered by the detailed construction traffic management plan.

It is noted that such a scheme would not be expected to result in any net income for Council. The object of the scheme would be to ensure that Council is compensated for any financial loss – so it is no worse off than if the project had complied with its commitments to avoid certain roads. Some of these requirements may have non-trivial implementation costs and are to therefore be enshrined in the SSD (as a statement of commitments or consent conditions) to ensure they are implemented. It is expected that these requirements could be reasonably waived or reduced later merit (post-SSD determination) where the developer or future constructor(s) propose innovative methods or changes to the traffic arrangements that would avoid the need for such measures. Passive or reactive management commitments will not be satisfactory on their own, as that approach would be expected to shift the high cost of monitoring efforts and the burden of proof onto Council and other community stakeholders, for the duration of the project.

The provision of new accommodation facilities is also expected to be closely tied to outcomes such as road safety, community perceptions of traffic increase, and rate of gravel loss (higher maintenance) on unsealed roads. Section 7 addresses this in greater detail.

A response is requested also addressing the details in **Attachment A**.

6. Securing a Planning Agreement

As the sphere of government directly responsible for the day-to-day governance of Warrumbungle LGA, the issues confronting Council are significant and diverse. Whether it be roads and bridges, water and sewerage systems, waste, community buildings, recreation or daycare facilities, the availability and quality of this infrastructure and social services has a significant influence on the quality of life and wellbeing of our citizens and ratepayers.

Council thus seeks development contributions from the Proponent via a Planning Agreement that acknowledges the tangible and intangible environmental, social, and economic costs arising from the Proposal. Such funds will be applied to a public purpose that will ensure the provision of a public benefit.

As discussed with the Proponent during Planning Agreement negotiations, the Council will be establishing a single Community Benefit Fund, which will receive the Development Contributions associated with each renewable energy project Planning Agreement. Council is aware of the community request for funds to be spent within the vicinity of each discrete project and will be calling for submissions to be made by the public within Warrumbungle LGA, to fund specific projects. Decisions on funding allocation will be made by a Council management committee, with specific input by local community representatives associated with each generation project.

Discussions with the Proponent on formulating a Planning Agreement are ongoing. Council requires that this Planning Agreement be finalised prior to the issuing of any development consent.

7. Employment of Locals and Construction Workforce Accommodation

The Proponent is likely to use an Engineering, Procurement and Construction (EPC) contractor to build the project. From experience, such service providers generally have limited appetite to employ and train locals. This is a major concern for Council and it requires the Proponent to meet with it to reach an agreement on what percentage of local workers will be employed, and trained as necessary, with that commitment to be taken on board by the contractor.

The EIS provides three scenarios for the percentages of local workforce which will be sourced locally, without a commitment to pursuing any specific quantum of local workforce. Council's position is in support of providing opportunities for local employment first prior to migrating workers to the area, with an emphasis on the Proponent providing training and upskilling of the local workforce.

The EIS notes that up to 587 full-time employees will be required during the peak construction period and approximately 12 full-time employees during operation and ongoing maintenance. It also notes the difficulty of accommodating such a large construction workforce in the surrounding towns, especially given the peak cumulative impacts of construction associated with the REZ between 2023 and 2026.

The EIS states a Workforce Accommodation Strategy is to be prepared which may include the construction of a workforce accommodation facility. Council requires further detailed information and substantial consultation to satisfactorily address this matter immediately. The matter of worker accommodation must be fully addressed to Council's satisfaction prior to any contemplation of the issuing of any development consent.

The likely shortfall in regional accommodation and key economic risks is well documented, especially cumulatively with other renewable projects that may occur at the same time. To ensure that accommodation provision for the project is adequate, while building sustainable long-term economic capacity in the local accommodation industry, it is suggested the project will need to actively implement a project accommodation model for a portion of the overall workforce population. The number of beds provided should be carefully designed to ensure any market boom cycle experienced by the local industry is orderly, and subsequent downswing does not result in long term economic damage to the community – for example, due to unsustainable public or private debt leverage servicing, or the maintenance costs of oversized or no longer needed buildings or infrastructure which are to be borne by the community.

It is noted that the EIS provides only a general overview of the key management measures that a Workforce Accommodation Strategy might address. Council believes that worker accommodation camps have the potential for large social impacts and require further information on the location, number of beds, management, plans for liquor licenses, fencing and security, basic facilities and shops medical facilities, worker transportation modes and vehicle numbers and decommissioning or repurposing.

The EIS discussion contains aspirational measures, and high-level enforceable commitments should be included as part of the SSD determination. Without such firm commitments, there is a real risk that individual projects will not equitably contribute to solving these problems, and the cumulative project demand will result in long-lasting and adverse economic shockwaves for the local economy.

The provision of new accommodation facilities is also expected to be closely tied to outcomes such as road safety, community perceptions of traffic increase, and rate of gravel loss (higher maintenance) on unsealed roads. Prior to SSD determination, high-level commitments should be made considering:

- Location of such facilities to balance the need to minimise travel distances for road safety and economic development reasons, between accommodation and both the project and residential amenities (largely in towns), as the incidence rate of road injuries or fatalities can closely correspond to the distance travelled.
- What road infrastructure upgrades and management measures may be required to safely accommodate traffic to and from the proposed facility.

8. Waste Management

Council has advised that the Warrumbungle waste management facilities are not able to accept waste from large scale developments, such as wind farms. This remains unchanged as stated within section 6.13.1 of the EIS.

Similarly, to the accommodation and water concerns above, the quantitative analysis provided in the EIS for waste assessment is insufficient and risks being vastly understated for the reasons out in **Attachment A**. Market forces alone cannot be relied on to responsibly dispose of waste, which as a

result is typically a non-commercial municipal-operated service across Australia. With the bulk of waste expected to go to landfill, it is critical that municipal waste facilities can adequately plan for capacity to meet demand and agree on user charges at levels sufficient to recoup the operating and expansion costs attributable to the project. If the project assessment (cumulatively with other projects) shows there are not adequate facilities, specific and enforceable measures for disposal may need to be tied to any SSD consent.

The proponent also leaves unresolved the question of where large turbine components will be sent at the end of their functional life due to the evolving nature of the industry and likelihood of future technologies. It is unclear whether this poses the risk of municipal facilities becoming the option of last resort for disposal of large bulky waste which is likely to exceed capacity of existing waste disposal facilities. Fibreglass as an example is understood to be a large proportion of the turbine blades and may not be economical to recycle unless the costs of doing so are built into the project decommissioning and rehabilitation requirements.

If non-municipal waste disposal or storage site(s) are proposed under the project, quantitative road traffic impacts also need to be assessed.

9. Water Management

The Proponent estimates 80ML - 120ML of water will be required for construction. It is unclear from the EIS as to the definitive source of water required for concrete batching and other construction activities e.g. washing out of concrete trucks.

Council seeks talks with the Proponent regarding the planned source of such water. Is it planned to utilise Council's supply – if so from where? - an existing nearby landowner bore, a new groundwater bore or extraction from a regulated surface water dam or river?

The minimal level of detail and numerical analysis provided in the water balance assessment is not acceptable for a project of this scale in a region with high water security uncertainty, given the forward climatic outlook and the likely cumulative impacts with other renewable projects. While deferral of a detailed water sourcing strategy to the post-consent phase may be appropriate, it must be demonstrated prior to SSD consent that existing surface and subsurface water sources will be adequate without being adversely affected, or new supply options are reasonably achievable without reliance on a third-party consent that has not yet been secured. For a critical resource like water which the local environment, economy and community of farmers, businesses and residents relies on, it is not sufficient to leave resolution of these concerns up to market forces post-consent, especially in the context of the multiple renewable projects in the pipeline. If unmanaged, any shortfall in water available in the environment is likely to be taken up from authority water supplies on a 'lowest cost to site' basis which may put significant cumulative strain on limited reservoir capacities.

Council is also concerned about water usage and sourcing during drought, Appendix 7 – Summary of Management and Mitigation Measures does not provide for alternative water supply or addresses the issue of water supply during drought. Council seeks commentary on the safeguards to be adopted to ensure water security for local residents and agricultural practices during drought.

The project water demand analysis is substantially lower than estimates published by comparable projects under previous SSD applications. Notably, the EIS only briefly mentions water required for gravel conditioning and dust suppression without stating assumptions. Preliminary estimates suggest due to the large quantity (>) of internal and external road works, the published water demand will be vastly exceeded, especially in expected dry conditions.

Council operates numerous town and village-scale water supply and sewerage systems. The EIS states that some water may need to be sourced from local potable supplies and trucked in, while wastewater would be collected and treated onsite before being disposed offsite to approved facilities

which are expected to be Council sewers or treatment plants. Supply for up to 500 headcount is not insignificant for the small-scale systems locally available. While the proponent may have a few economical options due to its geographic location between population centres, no quantitative assessment has been provided (either individually or cumulatively), and no commitments made to ensure that municipal services will both have the capacity to provide/treat the quantities required and are also fairly economically compensated for the costs to provide these services. If capacity upgrades to public facilities are required, given the short-term nature of the construction surge, these upgrades should be funded by the developer(s) of renewable projects that will use them through headworks contributions and/or user charges. Such commitments need to be captured in any SSD consent to ensure the community is not left to make up a shortfall.

Due to the relative inefficiency of bulk transport of water by road (high number of vehicle movements), the results of the project's water analysis will also likely have significant effects on the key traffic generation assumptions connected with the project, which need to be assessed prior to SSD determination.

It is noted that erosion and sediment controls will be designed and installed in accordance with the 'NSW Blue Book'. Due to the steep gradients, highly erodible soils, and potentially dispersive soils, it is recommended that all Plans be prepared and approved by a suitably qualified professional in erosion and sediment control.

A response is requested also addressing the details in **Attachment A**.

10. Bushfire Management

Council requires further information regarding the mechanisms the Proponent intends to action to avoid and minimize catastrophic bushfire outbreaks. Council also requires the Proposal, if approved, to retain trailer drawn firefighting equipment on site at multiple locations and basic equipment in all vehicles, in close proximity to the battery storage facility and at multiple sites across the wind farm to the written satisfaction of the local RFS.

Council requests that the Warrumbungle Emergency Management Committee be included in the Bushfire Emergency Management Plan and in all consultation regarding bushfire and emergency management.

11. Social Impact

Council states its agreement with section 3.2 of Appendix 21, regarding concern of the demand for workforce accommodation facilities because of multiple concurrent and ongoing projects in the region and the potential for this demand to impact on tourism operators and activities.

Council seeks greater transparency and robustness of information on the safeguards to be adopted to prevent social impacts caused by the operation of construction camps and the general influx of up to say 7,000 to 10,000 construction workers across the REZ. Council notes Table 4.18 of Appendix 21 does not address this aspect and Appendix 7 provides limited specifics regarding the type and location of worker accommodation.

12. Telecommunications

Council notes that the Developer is investigating further initiatives regarding telecommunication upgrades, for the benefit of the Project and the local and regional community. Council is generally supportive of any upgrades and seeks additional information on planned upgrades and associated impacts.

13. Lighting

Consultation with Siding Spring Observatory is required for any lighting proposed as part of the development. Warrumbungle LGA is part of the Dark Sky Park and Dark Sky Guidelines apply.

14. Heritage

Council has a Heritage Strategy (located on our website) that should be referred to identified heritage items in the vicinity of the proposal. It is noted the following items were not identified within the EIS - Dapper Union Church, 1104 Sandy Creek Road; Laheys Creek Private Cemetery, 1050 Spring Ridge Road (both these items are closer to the project site than those listed in the Appendix 12.0). Heritage items within locality of Cobbora (as listed in Council's Heritage Strategy) should also be acknowledged in the EIS, these being – Cobbora Hall (next to Cobbora Police Station) and Martin's House in Birriwa Street, Cobbora. Council requests that all heritage items and places of heritage significance need to remain in place and intact, and be protected throughout the life of the project.

15. Cumulative Impacts

Approximately 35 renewable energy projects are currently planned for location within the CWO REZ. Council is concerned about the myriad of impacts this will generate on its residents and ratepayers. Thus, it seeks substantive information from both the Proponent- and the NSW Government – on the likely cumulative impacts in the Shire and what benefits will be forthcoming to both Council and the region generally to compensate for these impacts.

Council notes that the EIS estimates peak cumulative impacts of construction associated with the REZ to fall between 2023 and 2026. This seems most unlikely given the EnergyCo Transmission Line will struggle to be ready before mid-2028.

Council requests specific details regarding the scheduling of the construction phase of this project in relation to all other renewable energy projects within the CWO-REZ including the EnergyCo transmission lines. This should include the start date and planned duration.

It is noted that the Social Impact Assessment ranked the cumulative impact of increased pressures on local facilities and services, particularly local health care and facilities, as high impact significance. It is noted that the EIS addresses 'health and wellbeing' through the Community Benefit Sharing Initiative and the recommendation to "broaden identification of stakeholders within the plan, to EnergyCo and other local renewable energy proponents/developers where feasible in order to foster collaboration in relation to addressing cumulative impacts", however this approach does not provide any mitigation measures for the impacts and additional demands which will be placed on social services, particularly health-related, police and other emergency services. The EIS identifies this as a cumulative impact which must be addressed in consultation with EnergyCo and other proponents, however each individual project will add additional burden.

It would also be appropriate if the proposed Orana Wind Farm was included in the assessment of cumulative impacts, it was noted it has been omitted from the discussions and Council requests it be included.

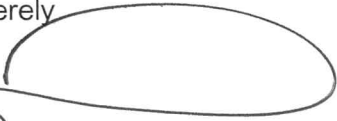
16. Conclusion

Whilst Council is generally supportive of renewable energy initiatives, it has significant concerns about the Proposal, arising in part from the inadequacy of the information contained in the EIS. Thus, Council is not able to make an informed judgement as to the relative benefits and costs of the Proposal, and objects to the Proposal.

However, Council does look forward to more substantive dialogue with the Developer, EnergyCo and DPE. If that is to occur and matters of material concern are satisfactorily addressed, then Council may be able to review its position in relation to the project.

If you have any queries regarding the abovementioned matters, please don't hesitate to contact the undersigned.

Yours sincerely

Handwritten signature of Roger Bailey, consisting of the letters 'R' and 'B' in a stylized, cursive font.A large, hand-drawn oval scribble in black ink, positioned to the right of the signature.

**ROGER BAILEY
GENERAL MANAGER
WARRUMBUNGLE SHIRE COUNCIL**

Attachment A

Warrumbungle Shire Council – Supplementary Submission Items

1. It is noted that for the purpose of cumulative impact assessments discussed below, the Dapper Solar Farm, Cobbora Solar Farm, Sandy Creek Solar Farm, Orana Wind Farm and EnergyCo Elong Elong Energy Hub (as well as the transmission line itself) are all proposed near the subject Spicers Creek Wind Farm site and would rely on substantially the same public roads and town catchments (including all municipal amenities). The cumulative impact assessment (EIS s. 2.4) lacks a quantitative element which will be critical in ensuring the region can accommodate all project demands if the Renewable Energy Zone (REZ) is to fully develop within the medium-term planning horizon.

Roads (Supplementary)

2. Although the project proposes to generally prohibit light or heavy vehicle access via Warrumbungle Shire-controlled roads (Spring Ridge Rd, etc.), significant vehicle wear and tear on Council controlled roads is expected, and any PA offer should respond proportionately. Even if the proposed designated access routes are successfully managed, Council holds concerns that the proposed eastern extent of the project footprint which shows some 11 WTGs situated along Bald Hill Rd between Dapper Rd and Sandy Creek will result in substantial pavement deterioration due to project traffic.
3. A permanent substation and three (3) site compounds are shown (EIS App4 Dwg 278 Sheet 9) at the eastern project extent adjacent to Sandy Creek. As one of only six or so major 'clusters' of compounds serving the entire project, a significant share of project traffic is expected. If internal project road speed limits are applied by the developer or constructor for WHS reasons, then the travel distance and travel time to/from these compounds via Sandy Creek Rd is expected to be significantly shorter and at a higher speed limit, potentially halving travel time. It is therefore unclear how the developer will ensure (for the duration of the 30 year or more project life) that vehicle movements would use Bald Hill Rd (only) to access the site internal roads, before joining the Golden Hwy at the designated site gates (Sweeneys Ln and Saxa Rd) or in reverse. Distinct user types will have strong incentives to take the shortest route and should be considered in the proposed management measures:
 - a) Commuter traffic between these eastern site compounds and surrounding population centres/accommodation, and
 - b) Heavy vehicle traffic with deliveries to/from the Hunter Valley, Mudgee and Dubbo via the Golden Hwy (etc.)
4. As stated elsewhere, there are indications the workforce may be larger than 320 headcount on average for the duration of construction. The EIS estimates (pg. 15) an average 320 daily light vehicle trips (one-way movements), which implies an assumed average car-pooling rate of 2 worker occupants per vehicle. Noting that regional workers and regional tradespeople with 'tool of trade' vehicles typically travel alone and accommodation is dispersed, few regional projects can achieve such a high car-pooling rate without strongly implementing quota management measures.
5. Firm minimum commitments by the proponent supporting this objective should be incorporated into any SSD consent. Such commitments may include a car-pooling policy and use of technology or active rostering to ensure targets are met, and/or a minimum number of

project-operated shuttle buses that service population centres. These measures would be expected to also significantly reduce road safety incidents for project traffic which could have a material economic or productivity (as well as social) benefit for the project. Alternatively, the average car occupancy rate should be assumed to be almost 1, which would be expected to result in greater than 640 light vehicle movements per day on the surrounding road network.

6. The EIS and Transport Assessment report (Samsa, Jul 2023) appear to significantly underestimate construction material quantities and thus the number of heavy vehicle movements required, as follows:
 - a. The EIS and Transport Assessment (TA) appear not to confirm the standard working days sought each week (e.g. Mon – Sat) which could affect reconciliation of daily, weekly, monthly, annual, and total construction phase vehicle movements.
 - b. The TA (s. 4.2.2) states 50 km length of internal access roads are to be constructed, while the EIS states 165 km (Table 3.2). A 250mm average pavement depth may or may not be sufficient depending on site ground conditions but makes no allowance for any offsite road works gravel quantities (which otherwise appear not to have been quantified). The TA thus significantly underestimates the volume of truck movements for this item. The assumption '*much of this material could be readily sourced on-site*' may also be misleading as hard-rock gravel to meet road base quality requirements (whether for private or public roads) should not be assumed to be abundant or economically viable to extract within the project footprint. The somewhat constrained number of regional suppliers attests to this risk for the REZ generally.
 - c. There is no mention in the TA of granular material (including clean sand) typically required for internal cable (electrical) trenches, for which the EIS estimates 225 km will be required.
 - d. The locations of the following facilities remain unconfirmed and there is a risk that eventual project impacts are not accurately assessed prior to SSD determination:
 - i. Estimated total quantities of high-quality (high strength) road gravels to be imported from existing or proposed offsite quarries that both have adequate production capacity and are identified within the economical catchment for transport to the project. It is noted with forecast cumulative renewable project demands from the existing large-scale hard rock quarries in the region, further regional supply may be needed.
 - ii. Onsite batch plants. These may be expected to significantly influence traffic impacts as they require both bulk import and export of large quantities of gravel, sand, water, cement, and finished concrete.
 - iii. Onsite borrow pits, quarries, screening and crushing plants. The EIS asserts these will be developed post any SSD consent, however it cannot be assumed that viable high-quality gravels or sands can be

sourced within the project extent and as such assessment of these impacts (on traffic etc.) are effectively being deferred to outside the current SSD application.

Proposed or likely locations for facilities known to be required to support the project material quantities should be confirmed.

- e. The Battery Energy Storage System (BESS) alone is stated (EIS Table 3.2) to have a gravel hardstand area of approximately 100,000 to 145,000 m² which could require in the order of (for illustration only) 3,000 truck and dog loads (6,000 movements) between the site and the source(s) of gravel.
- f. As such, the vast quantity of such gravels and sands required for hundreds of kilometres of internal and external road surfacing, engineered hardstands, structural foundations, and services (electrical) trenching appears likely to require extensive truck traffic on public roads across the broader region and the numerical assessment in the EIS and Transport Assessment do not fully account for these.

Water and Sewage (Supplementary)

7. The EIS estimates (Table 6.42) some 800 kL of total project-generated sewage / wastewater, equating to around 2L per worker per day on average (for 320 persons). It is unclear if this assessment is accurate as the Water Services Association of Australia (WSA02) guidance in the order of 100 times higher waste generation per Equivalent Population should be adopted (noting this would be split between daytime and overnight facilities). Quantitative assessment should confirm. Concept parameters for the onsite treatment systems and land application areas should be provided, and quantify the portions of waste expected to be dispersed at the site, in contrast with quantities and tangible options for disposal of any residual waste/wastewater by trucking to small-scale community (town/village) facilities which must be shown to have capacity to accommodate the quantities of cumulative waste generated by relevant renewables projects.

Waste (Supplementary)

8. The project waste quantity estimates (EIS Table 6.4.2) for concrete (approx. 40 tonnes or 17m³) and metal (approx. 200t or 25m³) appear to be significantly understated, potentially representing wastage far lower than 0.1% of the totals of these project materials (including the mass of the WTG towers and foundations) which is a very low waste rate by broader construction industry benchmarks. For example, if 117 WTGs might be expected to generate in the order of 16,000 standard concrete agitator loads for the tower foundations alone, the quantity of washout waste concrete alone could be much higher.
9. Quantitative assessment that there is available capacity at local, legal waste disposal facilities for the proposed construction waste is required prior to SSD determination, in the context of cumulative renewable projects in the area.
10. The quantitative waste assessment should include disposal of materials at decommissioning, and disposal of major turbine components when they reach the end of their service life, as discussed elsewhere.

Project Layout

11. Please clarify on the layout plan that if the SSD is approved, micro-siting of WTGs will not result in blades or permanent ground facilities to encroach (overhang) public dedicated road or drainage reserves, and private lease areas will not include public land. Public land should not be burdened in the long term for private benefit. Temporary or permanent encroachments must also not potentially conflict with public use of the reserves, for example for high-speed vehicle travel by the public in perpetuity, or installation of infrastructure supporting public uses. The following WTGs / land parcels are highlighted:
 - a. Lot 32 DP 754329,
 - b. 64, 70, 72 and 89/754305.

12. Council generally does not object to the proposed subdivision strategy (EIS App4 Sheet 18 Potential Subdivision of Lot 32/754329 off Sandy Creek Rd) as the EIS confirms no new dwelling entitlements are to be created. Council submits that as part of the proposed subdivision there will be a nexus created (by land use intensification) for the proponent and DPE as the consent authority to either:
 - a. Ensure that public dedicated road reserves or easements for rights of access are created over the subdivided land to rectify the existing situation of the following 'land-locked' lots (lots currently without the benefit of legal access corridors if they were sold individually)
 - Lots 87 and 109 DP 754305,
 - The existing Crown Road reserve serving 34/754329 to the east,
 - 12 and 37/754329,
 - 1 and 2/1279870.
 - b. Or in each of the above cases, obtain express written proof of landowner's consent to waive this requirement.

13. The proposed subdivision fronting Sandy Creek Rd is to include survey of the existing Sandy Creek Rd formation, and dedication to Council of any land required for road widening to contain the formation within reserved land. There is a nexus (at no cost to Council) as the proposal will intensify adjoining land use and traffic generation.

14. Additionally, the subdivision strategy should clarify how physical works and easements for access and services benefiting the proposed lots in the subdivision will be created. It is understood Crown Lands will not accept construction of formed roads within 'paper' Crown Road reserves, unless the reserves are transferred to Council. Council policies prohibit ownership transfer of any road reserves to Council (with or without formed carriageway) unless a road carriageway will be brought up to minimum standard by the developer, at no cost to Council and in accordance with Council's Development Control Plan and any relevant engineering specifications that may apply at the time of detailed design (Roads Act Section 138) application to Council. If new roads will be dedicated to an authority other than Council, please provide proof of that authority's consent.

(End of Attachment A)