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22 May 2023

Mr Anthony Ko
Planning and Assessment
Department of Planning
Locked Bag 5022
PARRAMATTA NSW 2124

anthony.ko@planning.nsw.gov.au

Dear Anthony

Proposed Orana Wind Farm (SSD 58260958) – Council Input to the Draft SEARS

Thank you for the opportunity to provide input to the final SEARS.

As you are aware Warrumbungle Shire Council ('Council') is centred on the Central West Orana Renewable Energy Zone and there are a number of significant matters that Council wishes to see comprehensively addressed.

On first principles, the assessment needs to transparently identify the full suite of environmental, social and economic costs and benefits. Then, the EIS needs to clearly articulate who reaps the benefits and who wears the costs.

Council requires all the REZ-based proposed projects, including the Orana Wind Farm proposal ('proposal'), to comprehensively address the cumulative impacts of said development and identify long term sustainable benefits that will accrue to local residents and ratepayers.

Being more specific, Council requires the following additions to the final SEARS:

- a) Details of how and where the construction workforce will be housed. Given the accommodation pressures in the Shire, access to a construction workforce camp are expected, and what duration this will be for? Council's preference is workers camp to be located in, adjacent or close to towns within the Shire;
- b) Details of road upgrade provisions prior to project construction, make good provisions at the end of project construction and ongoing financial contributions to Council for road maintenance during the operational life of the project;

- c) The terms of the voluntary planning agreement with the relevant local councils (both Warrumbungle and Mid -Western); noting Council has an adopted policy position for REZ related developments; and seeks for appointment of a community-based committee to provide recommendations to Council on the expenditure of funds for all REZ-related planning agreement funds, excluding those funds identified for roads.
- d) Social Impact: definitive commitments regarding what percentage of the construction workforce will be locals;
- e) Social Impact: definitive commitments regarding what percentage of the construction workforce will be trainees and apprentices who reside locally;
- f) Social Impact: document details of the impacts associated with construction workforce accommodation. Also make definitive commitments regarding actions that will provide tangible social benefits across the LGA;
- g) Social Impact: document the demand for community infrastructure services and how that will be compensated for; and also, how job competition will impact local businesses;
- h) Address impact from DIDO workers (drive-in-drive-out). How many, and how will DIDO safety be addressed?
- i) Address the impacts on health and emergency services with influx of workers to the Dunedoo area, and consult with the Local Emergency Management Committee;
- j) The volumes of water, sand and gravel required for construction and the proposed source of same;
- k) How and where the various waste streams and resultant volumes will be managed and/or disposed, noting that Warrumbungle Shire Council is not in a position to accept any waste generated by the proposed development;
- l) Consider the Dark Sky Planning Guideline;
- m) Consider Council's adopted Heritage Strategy and the heritage items listed within;
- n) Provide an assessment of the impact of the turbines on the safe and efficient use of agribusiness drones and the aerial application of agricultural fertilisers and pesticides in the vicinity of the turbines and transmission line. Also, to address the impacts of the turbines on aerial firefighting ability;
- o) Detail the progressive rehabilitation of the site;
- p) State the likely project scheduling relative to all other proposed generation facilities and the commissioning of the EnergyCo transmission line;
- q) Include that the proponent must also liaise with Dubbo Regional Council, given it is a key LGA in the REZ.
- r) Spir Road is noted in the Scoping Study. While it partially is in Warrumbungle Shire it is not a Council maintained road but rather a Crown Road.
- s) The report states that the wind farm will be accessed via Tucklan Road at the Golden Highway from the north of the wind farm site. As this would be through residential areas of Wargundy Street and Sullivan Street (Golden Highway) within Dunedoo, heavy vehicles including OSOM vehicles would cause detrimental impacts on the community and the road infrastructure. To accommodate the increase in heavy vehicles the intersection of Wargundy Street and Sullivan Street (Golden Highway) would require to be upgraded to improve heavy vehicle turning paths, safety, sight distance, geometry and stacking distances. This intersection is located within 35m of a rail crossing and within 25m of the heavy vehicle rest entrance both located on the Sullivan Street (Golden Highway). Light vehicles associated with the development on Tucklan Road (Wargundy Street in Dunedoo) are also likely to increase the congestion at this intersection.
- t) There is no mention of likely upgrades to Avonside and Lincoln Roads though these roads are within the proposed development area. The report indicates

these two roads are not proposed to be used. There is a network of tracks within the development site and at times the tracks are crossing the public roads. At the point the tracks intersect with the public road they must be considered in the EIS, constructed to a suitable standard and vehicles traversing the road must be legally allowed on a public road for their vehicle type.

- u) The intersection with Golden Highway and Spring Ridge Road is likely to need upgrading if the proposal changes and they require Spring Ridge Road for heavy vehicles.
- v) The Warrumbungle Shire road network was devastated by three natural disasters in 2021 and 2022 with many roads being completely destroyed. If such weather events were to occur again, we know this would result in numerous and possibly lengthy road closures in the development area. To mitigate the risk, the roads will need to be upgraded if the developer requires a more reliable accessible network.
- w) In addition to approvals for OSOM vehicles, approvals would also be required for other heavy vehicles such as road trains and those operating under Performance Based Standards (PBS). Approvals would also be required for any heavy vehicles wishing to operate at higher mass limits (HML).

If there are any queries in relation to the above, please contact Council on ph 02 68 49200 or the undersigned on Leeanne.Ryan@warrumbungle.nsw.gov.au

Yours sincerely



LEEANNE RYAN
DIRECTOR ENVIRONMENT AND DEVELOPMENT SERVICES

