

18 May 2026

Attn: Jessica Watson
Senior Environmental Assessment Officer
Energy Assessments
Department of Planning, Housing and Infrastructure

Via email

Dear Jessica,

**SUBMISSION: PUBLIC EXHIBITION – EIS FOR WALLABY CREEK WIND FARM PROJECT
(SSD-60247221)**

Thank you for the opportunity to provide comment on the EIS on exhibition for the Project. It is understood the development involves construction and operation of a wind farm with up to 38 wind turbines, battery storage and associated infrastructure within the Narromine Shire. The Narromine Shire Council does not object to the development; however, many aspects of the development be noted below where amendment or further refinement of proposed works is sought.

Consultation

Council staff would require early engagement in the relevant matters and opportunity for ongoing review of any management plans. Further consultation is noted as necessary to occur with Narromine Shire Council regarding:

- Waste management
- Traffic and transport management
 - Road maintenance contributions
 - Pre-condition survey and Decommissioning phase
 - Local road upgrades
- Emergency response planning
- Aviation safety and
- Community Benefit sharing program.

Community Benefits

It is acknowledged that 'benefit sharing' in accordance with the Benefit Sharing Guideline will be received for allocation by the Narromine Shire Council through a Planning Agreement under section 7.4 of the EP&A Act'. At this stage Narromine Shire Council has had very early discussion only. We further note that the guideline (minimum) rate of \$1,050 per megawatt per annum for a wind energy development was established in 2024 and given the high rate of inflation and the cost increases in construction, Narromine Shire Council would expect a higher starting rate as a contribution.

Narromine Shire Council also understands that while the wind farm construction costs and the BESS will be covered under the Benefit Sharing Guidelines the impact of road construction, electricity distribution lines, workers camps and the development of the quarry would be considered outside of the benefit sharing guideline and negotiated accordingly.

Significant likely impacts of the development (Noise, Visual)

There are no proposed or operational, large-scale developments within 10 km of Project infrastructure including, WTGs, & BESS. The visual impacts will be significant to the Shire.

Overall, the impacts to host landholdings and relevant neighbouring properties have been discounted in the EIS due to the existence of separate landholder agreements. The understanding of the actual impacts of the development is hence not thoroughly demonstrated, and Council is concerned that the visual and noise impacts are not clearly presented. The community would benefit from understanding the total operational impacts of the development and the proposed mitigation through 'associating land' with agreements as part of the Project. Overall, improved mapping would benefit the EIS. It is not clear from aerial mapping without useful labels as to where WTG are to be located.

Construction EMP details are expected to include clarification of the progress timing and staging of work activities. The community would benefit from clear knowledge of works that may advance prior to the temporary workers camp construction.

It is unclear whether the noise assessment has addressed the operation of a temporary worker accommodation facility. The assessment does not seem to address the camp as part of the construction noise assessment. Further noise assessment is requested.

It is noted that the alignment of a new transmission line has been amended during the EIS preparation. Clarity on the potential for future changes to the alignment of power line has also been sought by the community.

Temporary Worker Accommodation

Narromine Shire Council raises objection to the camp location. Council would request an amendment to the Project or a condition that facilitates the potential future sharing of infrastructure, and relocation of the temporary camp to a site closer to the urban area of Narromine.

When infrastructure is located within a suitable setting and has the potential to leave a lasting legacy, these opportunities are preferably explored. The nominated location on Tantitha Road will limit the opportunities for partnerships with other projects occurring locally. The siting restricts potential to utilise the site's temporary workers accommodation in partnership which could potentially support a reduction in environmental impact to the Shire, as well as enhance any legacy.

Council would be supportive of a concept for a temporary workers accommodation that more closely aligns with the objectives adopted in the Narromine LEP 2011 for temporary workers accommodation (refer to clause 5.25A). It is understood, further consultation with the applicant regarding infrastructure provided in connection with the development is to

occur. Council would encourage opportunities for additional long term community benefit, as well as encouraging local spending. It is preferable to explore options that allow infrastructure associated with the camp, to remain in use, even after the accommodation is no longer needed.

Impacts of the camp required for the workforce could be reduced through relocation to a site closer to Narromine. This should not be excluded as an option due to reasons for distance of worker travel times. The distance for travel from Narromine for workers to the central location of the project site is within 15-25 minutes. The servicing of the proposed isolated site for sewage and greywater collection will require additional traffic consideration and servicing availability. A site closer to Narromine could utilise town infrastructure and reduce rehabilitation obligations and reduce impact on agricultural land.

The recent IPC determination of a Solar Farm in the Narromine Shire (SSD-55968733) included a condition to require an Accommodation and Employment Strategy that must *'propose measures to investigate opportunities to utilise the site's temporary workers accommodation to support other renewable energy project within the region'*. NSC would request that the proponent similarly be required to include measures to take advantage of opportunities to reduce the overall impact of the development due to a temporary workers camp, through shared arrangements. It is suggested that a similar condition be strengthened to more than an obligation to *'propose measures to investigate opportunities'*, and meaningful negotiations should be required.

Rehabilitation of the camp site suitable for primary production has not been adequately addressed. Decommissioning phase referenced in the EIS pertains primarily to the plant and equipment at decommissioning at end-of-life project phase. Avoiding impact to agricultural land could be achieved by an alternative temporary works camp site closer to the Narromine township. This would also reduce biosecurity risk and weed management measures required.

Water Supply Options

A water supply for the construction period has not been demonstrated. A feasible volume of supply water should be identified in the EIS. Deferring the identification of sources of water to the stage of appointment of a contractor is not supported.

Water supply is a limiting factor for the development. If a satisfactory volume of water cannot be guaranteed, the scale and timing of the project is uncertain. NSC would request that the proponent demonstrate a sufficient water supply for all stages of the development prior to determination.

If tankering water to the concrete batching plant is proposed the impacts on roads/traffic assessment should be clarified. If groundwater purchased from associated or adjacent landowners is proposed it is requested that this be identified to make clear traffic impacts on neighbouring properties and the existing bores in the locality.

Washdown areas – water volume required and sources is not determined. Vehicles are stated to be washed prior to entering an agricultural area? It is requested that the definition of what is to be assumed as such an area? Figure 3-2 is not of an appropriate scale to identify the washdown areas.

The proponent should demonstrate a water supply to ensure construction impacts and limitations are known, and to avoid instances where dust suppression and washdown capacity is limited due to lack of consistent water supply.

Aviation

It is expected that where required, aviation hazard lighting must meet the requirements of Australian Standard AS 4282 - 1997 and any prescribed or notified CASA requirement. It is not clear whether the visual impact assessment has considered the nighttime visual impacts of the use of aviation warning lighting on met masts etc.

Council requests that the assessment be updated to include an assessment of impact on gliding activity. NSC had previously been requested (Jan 2026) by the proponent to comment on a draft Aviation Impact Assessment. At the time Council staff obtained a consultant's fee estimate, as the review requires specialist expertise outside of Council's internal resources. The advice was not provided, as the Aviation Impact Assessment at the time was not complete and would have required Council to expend considerable funds.

Narromine, known as the "Gliding Capital of Australia", is considered to be the best gliding area in Australia, and one of the three best in the world. With beautiful weather and thermals, along with no airspace restrictions, pilots from around the world visit regularly to participate in recreational flying, gliding and to take part in the National and State Gliding Championships. The aerodrome has hosted the annual 'Ausfly' event which is a national fly in for general aviation and has recently hosted both the State and National aerobatic championships. The impact on the gliding activity is not quantified. NSC seeks to protect the Narromine Aerodrome as a major tourist attraction and opportunities for future aviation business growth.

NSC, as the manager of the Narromine Aerodrome, has not been able to technically review and comment on the impact of the wind farm. Of particular concern, the EIS notes the minimum sector altitude for Narromine Airport would need to be raised by 91.44m. This has potential to change regular aircraft operations in the area. Further, staff do not have expertise to comment on the potential impact of shadow flicker and blade glint on gliding activity. These matters are requested to be addressed by the proponent and Council have opportunity for further external specialist review, to be carried out at the expense of the proponent.

Council requests the Aviation Impact Assessment be updated with clear assessment of impacts to the aviation industry in Narromine, including risks to gliding activity. Impacts that restrict the use of the Narromine Aerodrome for gliding competitions and present unacceptable risk are opposed. In accordance with the NATIONAL AIRPORTS SAFEGUARDING FRAMEWORK Guideline D (NASF Guideline D), wind farm operators should check if proposed wind turbines and wind monitoring towers will be located near areas where low flying operations are likely to be conducted, and if so, consider their duty of care to such activities.

Consideration of the Instrument approach, being the procedure to be followed by pilots in bad weather, has not been clearly assessed. Concerns remain that the Aviation Impact Assessment has not adequately considered the impact on flight in cloud, at low altitude at Narromine, when following the published procedure. Concerns raised through the Aerodrome Users Group and Aero Club have raised similar view that there may be

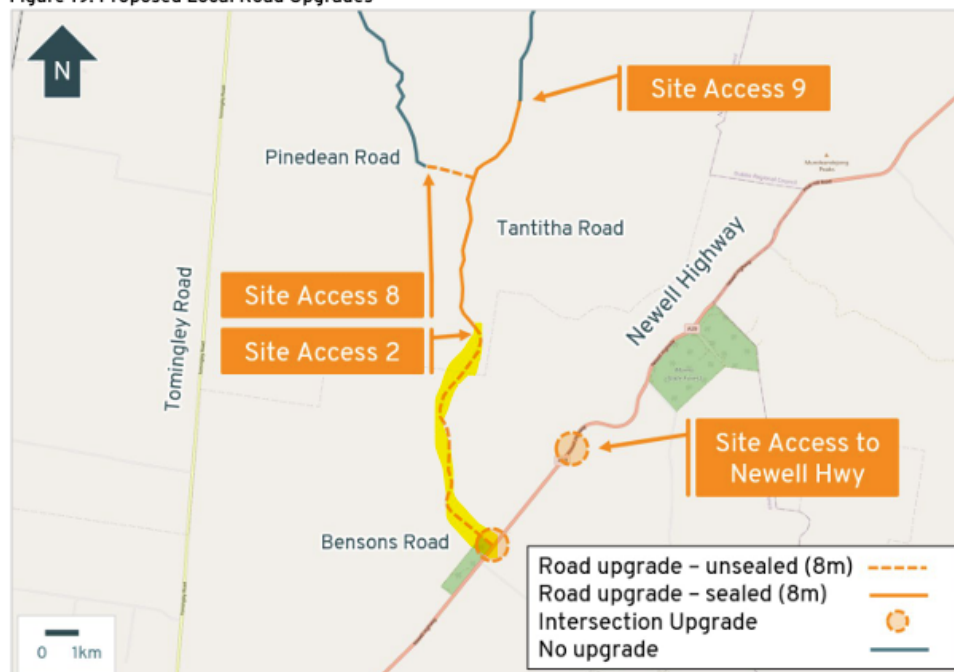
interaction between the proposed WTG sites and the instrument approach, and when a 'missed approach' occurs at Narromine. Further detail is required to ensure safety and nil impacts to flying operations at Narromine Aerodrome.

The NASF Guideline D 'Guidelines for Land Use Planners and Developers to Manage the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms) /Wind Monitoring Towers' notes that "Wind farm operators should be aware that wind turbines may create turbulence which noticeable up to 16 rotor diameters from the turbine. In the case of one of the larger wind turbines with a diameter of 125 metres, turbulence may be present two kilometres downstream". The Aviation Impact Assessment (Aviation Projects) states page 38 "For the purpose of the wake turbulence analysis, a 183 m rotor diameter has been used. Based on the NASF Guideline, the effects of wake turbulence could be noticeable at 2928 m from the WTGs." However, the report adopts a lesser value based on 10 rotor diameters for consideration of adverse impacts. The adoption of the lesser value is not justified or considered in the context of gliding activity. This is a key matter of concern.

Roads

It is anticipated that under section 4.42 of the EP&A Act, further approvals are required, including an approval for any works under section 138 of the Roads Act 1993. Narromine Shire Council as the relevant road authority for works on local public roads requires the sealing of Bensons Road to site access 2 (highlighted below). Traffic will significantly increase because of the project, and the affected roads should be upgraded to NSC standards.

Figure 19: Proposed Local Road Upgrades

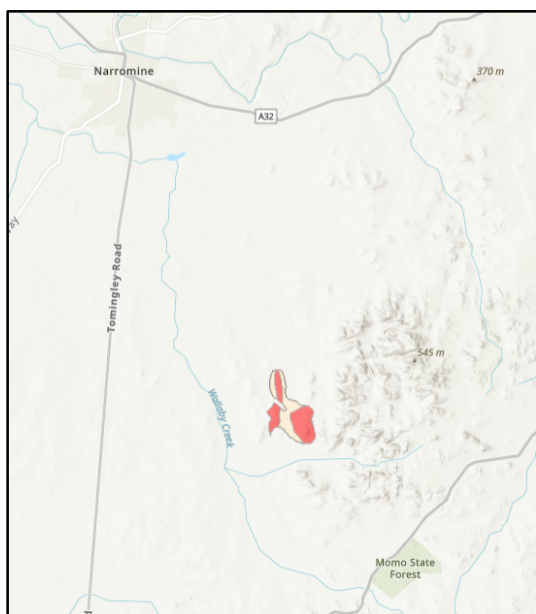


Source: OpenStreetMap

Naturally occurring asbestos (NOA)

The location of the workers camp and batching plant appears to be within close vicinity to known occurrence of naturally occurring asbestos. The Preliminary Site Investigation indicates that NOA was not identified within the buffer distance of 500m of the site, however

this should be more clearly investigated and extent confirmed as mapping indicate the site is likely impacted. Consider developing and putting an NOA management plan in place to minimise exposure when working in soils known to contain NOA.



Naturally Occurring Asbestos – known to occur near Tantitha Road

Dark Sky Region

Narromine LGA falls within the Dark Sky region. The inclusion of a temporary workers camp is likely to affect the night sky and is within 200 kilometres of Siding Spring Observatory. Consideration of the 'Dark Sky Planning Guideline' is encouraged.

Compliance with SEARS

NSC requested the EIS detail any separate s68 Activity Approvals or the like that are required. Impacts of effluent management methods and construction footprints are unclear. The EIS notes a septic tank may be constructed or amenity facilities may be pumped out via tanker and delivered to the closest available sewage treatment facility. Further consultation with NSC in this regard is requested. Where sewage is proposed to be managed onsite the Activity Approval is required to the requirements of NSC Policy - Onsite Sewage Management Systems Strategy, as well as industry guidelines. Construction approvals are not identified. The proponent should ensure a clear approvals pathway for construction of temporary and permanent structures (including the BESS) is identified, including additional Part 5 approvals.

NSC requested in SEARs that the impact assessments should consider the cumulative impacts of existing development – *consider the location of two approved extractive operations on Tantitha Road*. Cumulative impacts on the Tantitha road users and impact on such existing operations has not been clearly demonstrated within the EIS.

Cumulative impacts of heavy vehicle movements on Tantitha Road are not addressed specifically. It is unclear if the impact of existing and ongoing blasting activities carried out at approved quarries will impact WTG.

Borrow Pit

The EIS notes that a separate approvals pathway for a borrow pit (7ha+) will be sought prior to the construction of the Project under a separate application. As stated, construction of the Project is proposed to commence in April 2027 over a period of 24 months. The approval pathway for this borrow pit is requested to be clarified and timing for submission. The Narromine Shire Council Section 7.11 Contributions Plan 2020 -Heavy Vehicles will be applicable.

Biosecurity measures

In addition to the comments above regarding washdown areas, biosecurity measures are requested to be addressed in future management plans. Preventing, managing, and mitigating the introduction and spread of harmful pests, weeds, and diseases as detailed in the EIS is supported. Items such as erosion and sedimentation control straw bales, imported fill, shipping containers and the like with equipment and supplies are to be managed.

High risk activities to be identified – such as those that have the potential to disturb or distribute the red imported fire ants (*solenopsis invicta*) and result in the spread of fire ants across a site boundary. These may include: earthworks, revegetation and rehabilitation, export of construction waste and green materials. High risk materials that may house fire ants are to be managed appropriately.

Consideration of relevant guidelines in Construction EMPs is requested to address any precautionary and quarantine procedures, as recommended by DIPRD.

Hazardous development/ Waste management

It is recognised that the BESS is considered a 'potentially hazardous development' that requires quantities of dangerous goods. The two substations will require oil containment systems. The operations and maintenance facility will also have storage areas for oils, greases and other liquid hazardous substances. The development will have broad potential to cause land contamination, not limited to temporary facilities, such as laydown and batching plant areas and waste storage areas.

The Preliminary Site Investigation ruled out the existence of any significant existing contamination. A Construction Environmental Management Plan (CEMP) is to be developed to include an Unexpected Finds Protocol. However, the EIS is unclear on the proposed measures to address any contamination caused by development's activities and footprint. The EIS commits to a Decommissioning and Rehabilitation Plan to be prepared for the Project no less than five years prior to decommissioning and/or in accordance with any project approval requirements. It is requested that the any project approval requirements include confirmation/testing to ensure the pre-development state is achieved.

The Waste Management Plan is requested to include protocols to guide transport and disposal of waste materials that contain potentially hazardous substances. Council is concerned that waste soils, and contaminated soils, are not identified as a Waste Type in the listed 'indicative waste generation and management strategies – EIS, Table 6-96. Early consultation regarding the waste management plan is encouraged.

Should you wish to discuss this matter further please don't hesitate to be in contact with Council on 68889 9999.

Kind Regards,



Phil Johnston
Director Community and Economic Development