



Liverpool Range Wind Farm Modification 3

Submissions Report

Final

June 2026



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Submissions Report

Final

Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Tilt Renewables Australia Pty Ltd as trustee for Liverpool Range
Wind Farm Project Trust

Project Director: Kirsty Davies
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Report No.: 32409/R10
Date: June 2026



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Acknowledgement of Country

Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky.

We pay our respects to Elders past and present.

The below image is from the artwork *Yapung Maryiyang* (Pathway Forward) by Saretta Fielding.



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Executive Summary

The Liverpool Range Wind Farm Project (the LRWF Project) is an approved large scale renewable energy project which is being developed by Tilt Renewables Australia Pty Ltd as trustee for Liverpool Range Wind Farm Project Trust (the Applicant). The LRWF Project is authorised by State Significant Development (SSD) SSD-6696 (as modified) which provides for the construction, operation and decommissioning of up to 185 wind turbines and ancillary infrastructure.

The Site Boundary associated with the LRWF Project is located approximately 3 kilometres (km) east of the township of Coolah, New South Wales (NSW) extending across the Warrumbungle, Upper Hunter and Mid-Western Local Government Areas (LGAs). The LRWF Project forms a key component of the Central-West Orana (CWO) Renewable Energy Zone (REZ), an area defined by the NSW Government for renewable energy development, and has connection rights to the CWO REZ Transmission Line.

Following a value engineering process as part of detailed construction planning the Applicant is seeking to modify the Development Consent (Mod-3 Application) to provide for strategic project layout changes to improve the constructability, reduce overall environmental impact and improve compatibility with agricultural land use.

The LRWF Project will make a positive contribution to meeting the NSW and Commonwealth Governments' commitments to transition to renewable electricity generation. The changes proposed by the Mod-3 Application result in a more optimised infrastructure layout and will assist with progressing the LRWF Project more efficiently into construction and operation, delivering clean renewable energy faster to electricity consumers in the NEM.

The Mod-3 Application was publicly exhibited from 14 April 2026 to 28 April 2026 in accordance with the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) and the *Environmental Planning and Assessment Regulation 2021*. Submissions were received from government agencies, councils and members of the community during the exhibition period. On 29 April 2026, following exhibition, Department of Planning, Housing and Infrastructure (DPHI) requested the preparation of a Submissions Report to address the issues raised.

During the exhibition period, 22 submissions were received. This included ten (10) submissions from government agencies, four (4) Council submissions and eight (8) community submissions. None of the government agency or Council submissions objected to the Mod-3 Application, however further clarification and technical assessment updates have been undertaken to address three (3) of these submissions. The eight (8) community submissions received objected to the Mod-3 Application. The location analysis of the community submissions indicated majority of the submissions were from the local area with 75% (n-6) of submitters located within 5 km of the Project Site Boundary.

Economic, environmental and social impacts of the Mod-3 Application were the most frequently raised category of issues in the objecting community submissions received. The key themes to the economic, environmental and social issues included cumulative impact, visual impacts and bushfire management/aviation impacts.

Following the exhibition of the Mod-3 Application, the Applicant has continued to consult with relevant government agencies to address the requirements of the submissions through the preparation of this submissions report and to inform minor updates to the relevant specialist assessments.

No changes to the Mod-3 Layout have been identified through the detailed review of the matters raised in the submissions received. The updates to the technical assessments have been informed through detailed data review, further site survey (archaeology) and liaison with relevant government agencies. These updates further confirm that there are no new or increased environmental impacts associated with the Mod-3 Application when compared to the Approved Development.

The Mod-3 Application remains entirely consistent with the broader strategic context of the LRWF Project and will support the timely construction of the infrastructure while reducing its overall environmental impact.

Abbreviations

Abbreviation	Definition
ACHA	Aboriginal Cultural Heritage Assessment
AES	Accommodation and Employment Strategy
AFAC	Australasian Fire and Emergency Services Council
AGL	Above Ground Level
AHIMS	Aboriginal Heritage Information Management System
ALA	Aircraft Landing Area
APZ	Asset Protection Zone
ARPANSA	Australian Radiation Protection and Nuclear Safety Agency
AUL	Auxiliary Left
BAL	Basic Left Turn
BAM	Biodiversity Assessment Method
BAM-C	BAM Calculator
BAR	Basic Right Turn
BBUS	Bird and Bat Utilisation Survey
BDAR	Biodiversity Development Assessment Report
BMP	Biodiversity Management Plan
BoE	Balance of Easement
BoM	Bureau of Meteorology
CASA	Civil Aviation Safety Authority
CCC	Community Consultative Committee
CEEC	Critically Endangered Ecological Community
CHR	Channelised Right Turn
CPHR	Conservation Programs Heritage and Regulation Group
Cwth	Commonwealth
CWO	Central-West Orana
Day VFR	Day Visual Flight Rules
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPHI	Department of Planning, Housing and Infrastructure (current)
EIS	Environmental Impact Statement
EMF	Electromagnetic Field
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPA	NSW Environmental Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cwth)</i>
ESA	Equivalent Standard Axles
ESD	Ecologically Sustainable Development

Abbreviation	Definition
ft	Feet
ha	Hectare
IDF	Indicative Development Footprint
kV	Kilovolt
LGA	Local Government Area
LRWF	Liverpool Range Wind Farm
LSALT	Lowest Safe Altitudes
m	Metres
MNES	Matters of National Environmental Significance
MSC	Muswellbrook Shire Council
MW	Megawatt
MWRC	Mid-Western Regional Council
NEM	National Electricity Market
NIA	Noise Impact Assessment
NP	National Park
NPWS	NSW National Parks and Wildlife Service
NSW	New South Wales
O&M	Operation and Maintenance
OSOM	Oversize/overmass
PAD	Potential Archaeological Deposit
PCT	Plant Community Type
PRU	Public Road Upgrades
RAP	Registered Aboriginal Party
REBS	CPHR – Conservation Planning and Offsets Division – Renewable Energy Biodiversity Support
REZ	Renewable Energy Zone
RFS	Rural Fire Service
SAIL	Serious and Irreversible Impact
SAPs	Site Access Points
SCA	State Conservation Area
SCEP	Stakeholder and Community Engagement Plan
SEPP	State Environmental Planning Policy
SSD	State Significant Development
TfNSW	Transport for NSW
TIA	Traffic Impact Assessment
TMP	Traffic Management Plan
TWA	Temporary Workforce Accommodation
UHSC	Upper Hunter Shire Council

Abbreviation	Definition
μT	Microteslas
VPA	Voluntary Planning Agreement
WSC	Warrumbungle Shire Council

Glossary

Term	Description
Accommodation Camp	Temporary onsite workforce accommodation camp (previously referred to as a Temporary Workforce Accommodation Facility [TWA]).
Ancillary Infrastructure	All wind farm infrastructure with the exception of wind turbines, including but not limited to collector substations, switching stations, permanent offices and site compounds, underground and overhead electricity transmission lines, communications towers, wind monitoring masts and internal access roads.
Applicant	Tilt Renewables Australia Pty Ltd as trustee for Liverpool Range Wind Farm Project Trust (Tilt Renewables).
Approved Development	The currently approved Liverpool Range Wind Farm (LRWF) Project as modified under Development Consent SSD 6696 on 30 October 2025 (SSD-6696-Mod-2) providing for the construction, operation and decommissioning of up to 185 wind turbines and ancillary infrastructure.
Approved Development Corridor	The area which contains the Approved Indicative Development Footprint for the wind farm, transmission lines, accommodation camp and ancillary infrastructure with additional buffer to the Approved Indicative Development Footprint to allow for final detailed design and any micro-siting. The Approved Development Corridor comprised three separate areas that each encompass the relevant areas required to construct the Approved Development, referred to as the: • Approved Development Corridor – Wind Farm • Approved Development Corridor – External Transmission Line • Approved Development Corridor – TWA Facility.
Approved Indicative Development Footprint	The extent of approved ground disturbance and vegetation removal required for construction of the Approved Development, including turbine hardstands, internal access tracks, collector substations and ancillary equipment, the Internal and External Transmission Line, wind monitoring masts and other temporary and permanent ancillary infrastructure. The Approved Indicative Development Footprint comprises four separate areas that each encompass the relevant areas required to construct the Approved Development, referred to as the: • Approved Indicative Development Footprint – Wind Farm • Approved Indicative Development Footprint – External Transmission Line

Term	Description
	- Approved Indicative Development Footprint – Public Road Upgrades - Approved Indicative Development Footprint – TWA Facility.
Approved External Transmission Line	The portion of the approved transmission line extending from the southern-most collector substation near Rotherwood Road, Cassilis, south to a connection substation at Ulan, consisting of overhead powerlines of up to 330 kilovolt (kV), supported by poles or towers and located within a 60 m wide easement.
Approved Site Boundary	The Site Boundary contains the entirety of the approved wind farm infrastructure and the Approved External Transmission Line infrastructure.
Associated Residence	Any residence located on land hosting infrastructure or where Tilt Renewables has a negotiated agreement in place with the landowner in relation to impacts associated with the LRWF project.
Conditions of Consent	Consolidated Conditions of Development Consent SSD 6696 (as modified) which authorise and regulate the Approved Development.
Development Consent	Development Consent SSD 6696 (as modified) granted under Section 4.38 of the NSW <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) on 30 October 2025 (SSD-6696-Mod-2).
Environmental Impact Statement	As defined in Development Consent SSD-6696 (as modified), this includes the Environmental Impact Statement titled Liverpool Range Wind Farm Environmental Assessment, prepared by Epuron Pty Ltd and dated July 2014, as modified by associated assessment documentation: - the Liverpool Range Wind Farm Response to Submissions Report, dated May 2017 - the Modification Application for Modification 1 dated 1 September 2022, including Submissions Reports dated 14 August 2023 and 19 April 2024, Amendment Reports dated August 2023 and January 2024 and additional information provided on 13 September 2022, 18 January 2024, 13 March 2024 and 25 June 2024; and - the Modification Application for changes to the approved development corridor dated 12 September 2025.
EPBC 2022/09416	Current EPBC Approval under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> 'to install, operate and decommission a wind farm and associated ancillary infrastructure'. EPBC Approval was granted, subject to conditions, on 4 March 2025.
Micro-siting	Refinement of turbine and ancillary infrastructure placement to the extent allowed by the Conditions of Consent, considering design optimisation, environmental and physical constraints.
Mod-1 Development	Tilt Renewables submitted an application to modify the Development Consent (SSD-6696) under Section 4.55(2) of the NSW <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) in September 2022. This application is referred to as the Mod-1 Development. The key changes associated with Mod-1 were a reduction in the number of wind turbines to 185, an increase in the maximum blade tip height to 215 m above ground level (AGL), amendments to the associated infrastructure and inclusion of an onsite temporary workforce

Term	Description
	accommodation facility (TWA Facility). The Mod-1 Development was approved and modifications to the Development Consent granted on 23 October 2024 (SSD-6696-Mod-1).
Mod-2 Development	Tilt Renewables submitted an application to modify the Development Consent (SSD-6696-Mod-1) under Section 4.55(1A) of the NSW <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) in September 2025. This application is referred to as the Mod-2 Development. The Mod-2 Development sought the reinstatement of three discrete areas of land, totalling 15.6 hectares (ha), into the Approved Development Corridor to facilitate micro-siting of key ancillary infrastructure. The Mod-2 Development was approved on 30 October 2025 (SSD-6696-Mod-2).
Mod-3 Application	The Mod-3 Application reflects the current proposed Mod-3 Layout design refinements to the Approved Development, including revised Internal Transmission Line alignment, micro-siting and relocation of wind turbines, inclusion of communications towers and updated access track alignments. It proposes to remove the Approved External Transmission Line between the wind farm's connection substation and the approved connection point at Ulan, as access rights have been granted by the NSW Government to connect the LRWF project into the Central-West Orana Renewable Energy Zone (CWO REZ) Transmission Line. This connection will now occur within the connection substation on-site off Rotherwood Road.
Mod-3 Layout	The refined wind farm and ancillary infrastructure layout proposed as part of the Mod-3 Application.
Non-Associated Residence	Any residence on privately-owned land where the landowner has not reached a financial or in-kind agreement with Tilt Renewables in relation to the LRWF project.
Original Development	The original LRWF Project as approved in March 2018 under Development Consent SSD 6696 to allow for the construction, operation and decommissioning of up to 267 wind turbines with a maximum tip height of 165 m and associated infrastructure including a transmission line with an indicative capacity of 330 kV from within the wind farm to the approved connection point at Ulan.
Pre-construction Accommodation Camp	Temporary onsite workforce accommodation camp (prior to construction of the accommodation camp).
Proposed Development Corridor	The area which contains the Proposed Indicative Development Footprint for the wind farm, public road upgrades, Internal Transmission Line, accommodation camp and ancillary infrastructure with additional buffer to the Proposed Indicative Development Footprint to provide for final detailed design and micro-siting. The Proposed Development Corridor comprises two separate areas that each encompass the relevant areas required to construct the Mod-3 Layout, referred to as the: - Proposed Development Corridor – Wind Farm - Proposed Development Corridor – Public Road Upgrades.

Term	Description
Proposed Development Corridor – Additional Areas	Refers to the extent of additional development corridor areas outside of the Approved Development Corridor but within the site boundary and are considered by the Mod-3 Application.
Proposed Development Corridor – Wind Farm	The portion of the Proposed Development Corridor that includes all wind farm related infrastructure including wind turbines, hardstands, site access points, access tracks, underground reticulation cabling, Internal Transmission Line, collector sub-stations, connection substation, operation and maintenance facilities, temporary construction compounds (including accommodation camp, laydown areas and concrete batch plants), communications towers, permanent and temporary wind monitoring masts.
Proposed Development Corridor Public Road Upgrade – (PRU)	The portion of the Proposed Development Corridor that includes the upgrades/repairs to public road intersections and associated structures that may be required to facilitate the construction of the Mod-3 Layout. This corridor has been developed, defined and assessed separately as part of the Mod-3 Application to allow flexibility for further detailed design in consultation with Upper Hunter and Warrumbungle Shire Councils.
Proposed Indicative Development Footprint (IDF)	The estimated extent of proposed ground disturbance and vegetation removal required for construction of the Mod-3 Layout proposed as part of the Mod-3 Application, including wind turbines, hardstands, site access points, access tracks, underground reticulation cabling, Internal Transmission Line, collector sub-stations, connection substation, operation and maintenance facilities, temporary construction compounds (including accommodation camp, laydown areas and concrete batch plants), communications towers, permanent and temporary wind monitoring masts and the public road upgrades. The Proposed Indicative Development Footprint comprises three separate areas that each encompass the relevant areas required to construct the Mod-3 Layout, referred to as the: • Proposed Indicative Development Footprint (IDF) – Wind Farm • Proposed Indicative Development Footprint (IDF) – Balance of Easement (associated with Internal Transmission Line) • Proposed Indicative Development Footprint (IDF) – Public Road Upgrades.
Proposed Indicative Development Footprint – Balance of Easement	Portions of the Proposed Indicative Development Footprint relating to the Internal Transmission Line that does not require ground disturbance, however vegetation above four metres at maturity may require removal, pruning or management during operations for bushfire management and electrical safety purposes.
Proposed Indicative Development Footprint – Public Road Upgrades	The estimated extent of all temporary and permanent ground disturbance and vegetation removal associated with the construction of the public road upgrades.

Term	Description
Proposed Indicative Development Footprint – Wind Farm	The portion of the Proposed Development Corridor that includes all wind farm related infrastructure including wind turbines, hardstands, site access points, access tracks, underground reticulation cabling, Internal Transmission Line (which requires ground disturbance), collector sub-stations, connection substation, operation and maintenance facilities, temporary construction compounds (including accommodation camp, laydown areas and concrete batch plants), communications towers, permanent and temporary wind monitoring masts.
Internal Transmission Line	Overhead transmission line located within the wind farm north of the proposed connection to the CWO REZ Transmission Line at the connection sub-station in the wind farm, within F cluster off Rotherwood Road. Consists of an overhead powerline of up to 330 kV, supported by poles or towers and located within a 60 m wide easement.
Proposed Site Boundary	The Site Boundary contains the entirety of the Mod-3 Layout, including wind farm infrastructure. and public road upgrade design.
Residence	Any dwelling in existence at the date of submission of the Modification Report, or a dwelling that is either the subject of a development consent or a development application that was lodged but not yet determined at the date of submission of the Modification Report (26 March 2026).
Temporary Facilities	Temporary facilities used for the construction and/or decommissioning of the LRWF project, including but not limited to temporary site offices and compounds, concrete batching plants, accommodation camps, materials storage compounds, maintenance workshops, testing laboratories or material stockpiles.
The LRWF Project	The approved LRWF Project providing for the construction, operation and decommissioning of up to 185 wind turbines and ancillary infrastructure.
Wind Turbine	Turbines used for the generation of electricity by wind, including the tower, nacelle, hub, blades and associated components.

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1.0 Introduction

1.1 Background

Liverpool Range Wind Farm (LRWF) Project is an approved large scale renewable energy project which is being developed by Tilt Renewables Australia Pty Ltd (Tilt Renewables) as trustee for Liverpool Range Wind Farm Project Trust (the Applicant). The LRWF Project is authorised by State Significant Development (SSD) Consent SSD-6696 (which was originally granted by a delegate of the Minister for Planning on 27 March 2018 (Development Consent) and has been subsequently modified on 23 October 2024 (SSD-6696-Mod-1) and 30 October 2025 (SSD-6696-Mod-2) (the Approved Development). The LRWF Project, as authorised by the modified Development Consent, is referred to as the Approved Development.

The Site Boundary associated with the Approved Development is located approximately 3 kilometres (km) east of the township of Coolah, New South Wales (NSW) (at the closest point) refer to **Figure 1.1**. The Approved Development provides for the construction, operation and decommissioning of up to 185 wind turbines and ancillary infrastructure and is located within, and forms a key component of, the Central-West Orana (CWO) Renewable Energy Zone (REZ). The Approved Development extends across the Warrumbungle, Upper Hunter and Mid-Western Local Government Areas (LGAs) (refer to **Figure 1.2**).

Following a value engineering process as part of detailed construction planning the Applicant is seeking to modify the Approved Development, which is the subject of this modification application (Mod-3 Application).

The Mod-3 Application was publicly exhibited from 14 April 2026 to 28 April 2026 in accordance with the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) and the *Environmental Planning and Assessment Regulation 2021*. Submissions were received from government agencies, councils and members of the community during the exhibition period. On 29 April 2026, following exhibition, Department of Planning, Housing and Infrastructure (DPHI) requested the preparation of a Submissions Report to address the issues raised.

This Submissions Report has been prepared in response to that request and in accordance with clause 59(2) of the *Environmental Planning and Assessment Regulation 2021*, having regard to the *State Significant Development Guidelines: Preparing a Submissions Report* (DPHI, 2026) (Submissions Report Guideline). This report summarises the submissions received and provides detailed responses to the issues raised, as set out in **Section 4.0** and **Section 5.0** and provides an updated Project Justification in **Section 6.0**.

1.2 Project Overview

The Mod-3 Application proposes the following changes to the Approved Development:

- inclusion of up to seven communication towers to allow for an alternate communications pathway between substations (if required)
- inclusion of an optional access track off Coolah Creek Road

- micro-site 61 wind turbines (less than 100 m) and relocate 6 wind turbines (greater than 100 m)
- revised locations of ancillary infrastructure including permanent met masts, substations, concrete batch plants, Operation and Maintenance (O&M) facilities, site access points (SAPs) and internal access tracks
- inclusion of discrete areas to the Proposed Development Corridor – Wind Farm for constructability purposes and to provide flexibility for micro-siting the revised layout
- inclusion of a dedicated Proposed Development Corridor – Public Road Upgrades (PRU) along the public roads subject to potential upgrades/repairs as authorised under the Development Consent. The Proposed Development Corridor – PRU is proposed to capture the Proposed Indicative Development Footprint (IDF) for the expected road upgrades in accordance with Warrumbungle Shire Council and Upper Hunter Shire Council design requirements.

The Mod-3 Application proposes to also remove infrastructure components that will not be built. Although the removal of project components does not specifically require modification, this is included as it results in refinements to the Proposed IDF and an overall reduction in total impacts of the Mod-3 Layout relative to the Approved Development. The following components are proposed to be removed:

- 12 wind turbines (reduce the maximum number of wind turbines from 185 to 173)
- removing the External Transmission Line that extends to Ulan together with the associated infrastructure (including the concrete batch plant, connection substation/switchyard, access tracks and SAPs and the full extent of the External Transmission Line Development Corridor) as the wind farm will connect to the National Electricity Market (NEM) via the CWO REZ Transmission Line
- State Forest Road and most of Turee Vale Road for all Light, Heavy and Over-size/over-mass vehicles during construction and operations (a very small portion of Turee Vale Road will be used by LRWF Project vehicles to access both sides of the road beneath the Internal Transmission Line)
- discrete areas of Approved IDF and Approved Development Corridor no longer required due to the removal of wind turbines and associated access tracks.

The Mod-3 Layout is shown on **Figure 1.3**. A comparison of the Approved Development and the Mod-3 Layout is shown in **Table 1.1**, A revised Project Description is provided as **Appendix B** of the Modification Report.

Table 1.1 Comparison of Approved Development and Mod-3 Layout

Aspect	Original SSD-6696 Development Consent (2018)	Approved Development (2024/5)	Mod-3 Layout
Estimated Generation Capacity (assuming 7.2 MW wind turbine)	962 MW	1,332 MW	Reduction to 1,245.6 MW (-6.5%)
Max Blade Tip Height	165	215 m	No Change
Max number of wind turbines	267	185	Reduction to 173 (-6.5%)
Development Corridor Area	12,405 ha	8,949.9 ha, comprised of: Development Corridor – Wind Farm: 7,409.5 ha Development Corridor- PRU: n/a External Transmission Line Development Corridor: 1,540.4 ha	Reduction to 7,112.7 ha (-20.5%), comprised of: Proposed Development Corridor – Wind Farm: 6,664.2 ha (-10.1%) Proposed Development Corridor – PRU: 448.5 ha (+100%) Removal of External Transmission Line Development Corridor: 1,540.4 ha (-100%)
Indicative Development Footprint (IDF)	752.82 ha	1,803.7 ha, comprised of: Wind Farm IDF: 1,377.6 ha Public Road Upgrade IDF: 184.80 ha External Transmission Line IDF: 240.90 ha	Reduction to 1,581 ha (-12.3%), comprised of: Wind Farm IDF: 1,109.8 ha (-19.4%) Public Road Upgrade IDF: 274.30 ha (+48.4%) Removal of External Transmission Line IDF: 240.90 ha (-100%)
Collector Substations	Up to 4	Up to 7	Reduction to up to 6. Minor relocation of two substations. Collector substation off Rotherwood Road is now a Connection Substation to enable the LRWF Project to connect to CWO Transmission Project.
Connection Substation	1 (at Ulan)	1 (at Ulan)	Connection substation at Ulan removed. Connection substation is now located in the F Cluster off Rotherwood Road (previously designated as a collector substation). The LRWF

Aspect	Original SSD-6696 Development Consent (2018)	Approved Development (2024/5)	Mod-3 Layout
			Project will now connect to CWO Transmission Project.
Internal transmission line	28.19 km	Approximately 41.7 km overhead powerline up to 330kV	Reduction to approximately 40.1 km (-3.8%). Minor realignment of short section of overhead powerline to connect into revised substation location.
External transmission line	56.82 km	Approximately 41.7 km overhead powerline up to 330kV extending from wind farm to the approved connection point at Ulan.	Removed, including all associated access tracks, SAPs, temporary construction compounds/laydown areas/batching plants and associated infrastructure.
Reticulation cabling	274.1 km	Approximately 173.5 km underground electrical cabling (up to 33kV)	Reduction to approximately 162 km (-7%)
Access tracks	284.7 km	Approximately 246.4 km	Reduction to approximately 235.6 km (-4.4%). Minor realignment of access tracks. Removal and addition of access tracks associated with removal/addition of infrastructure. Additional optional access track off Coolah Creek Road.
Site access point (SAP)	Up to 24	Up to 74 SAPs, comprised of: Up to 34 to facilitate the wind farm Up to 40 to facilitate the external transmission line	Reduction to up to 25 SAPs (-68.9%), comprised of: 4 x new SAPs along Internal Transmission Line 10 x microsituated SAPs (<100 m) 2 x relocated SAPs (>100 m) 9 x approved SAPs (no change) Removal of 14 SAPs within the Wind Farm Removal of 40 SAPs along External Transmission Line

Aspect	Original SSD-6696 Development Consent (2018)	Approved Development (2024/5)	Mod-3 Layout
Operation and Maintenance (O&M) facility	1	Up to 3 (total of 3 locations identified)	No change to maximum number. Minor change to the location of 2 x O&M facilities following landowner request and for constructability.
Temporary construction compound/laydown area/concrete batch plant (CC/LD/BP)	12	Up to 10 (total of 14 potential locations identified)	No change to maximum number. Total of 20 CC/LD/BP potential locations identified. Changes to potential locations: 1 x location increased in area for constructability 1 x location micrositied (<100 m) for constructability 1 x location previously a substation 5 x new locations for constructability 1 x new location for LD only 11x approved locations have no change.
Accommodation Camp	N/A	Accommodation to provide for peak workforce of approximately 550 construction workers (previously referred to as the TWA)	No change
Public Road Upgrades/Repairs	Upgrades/repairs to public roads intersections and associated structures	Upgrades/repairs to public roads intersections and associated structures	Removal of State Forest Road and most of Turee Vale Road for all Light, Heavy and over-size/over-mass (OSOM) vehicles. Updates to ground disturbance (Proposed IDF) estimates following further detailed design and consultation with Councils. Inclusion of the Development Corridor - PRU to facilitate further detailed design and ensure all relevant environmental constraints are identified.

Aspect	Original SSD-6696 Development Consent (2018)	Approved Development (2024/5)	Mod-3 Layout
Permanent Wind Monitoring Masts	10	Up to 10	No change to maximum number– refinement to locations associated with refined turbine layout
Temporary site calibration monitoring masts	N/A	Up to 10	No change
Communication towers	N/A	N/A	Inclusion of up to 7 x communication towers (monopoles 40 m in height)

Legend

- Roads
- Named Watercourse
- ▬ Proposed Site Boundary
- ▭ Local Government Area
- National Park
- State Forest



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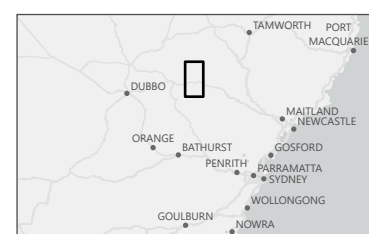


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Legend

- Approved Turbine Layout
- ▲ Met Mast Locations
- Substation Locations
- Construction compound / Laydown Area / Batch Plant
- O&M Facility
- Internal 330kV Transmission Line
- - - Underground Cables (250/223)
- Public Road Upgrades
- - - Access Tracks
- Roads
- ▭ Approved Site Boundary
- ▭ Approved Development Corridor
- ▭ Approved External Transmission Line Corridor
- ▭ Workforce Accommodation Camp Site
- ▭ CWO REZ Transmission Corridor



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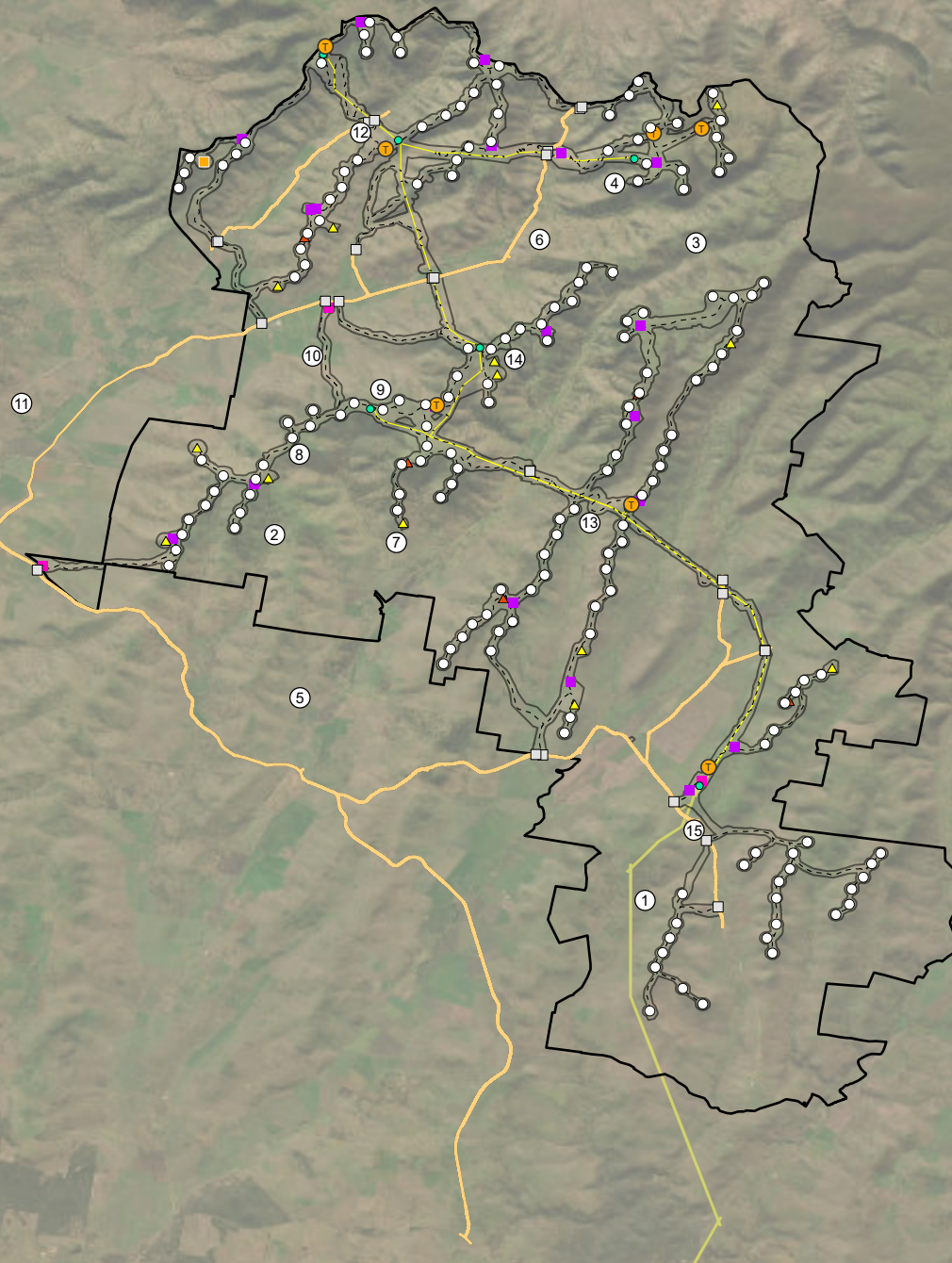
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FIGURE 1.3
Mod-3 Application
Indicative Layout

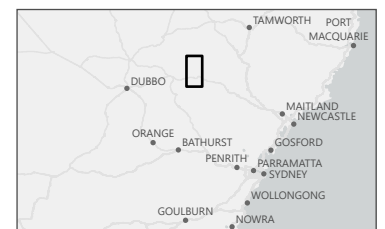
Legend

- Site Access
- Preliminary Turbine Layout (subject to confirmation)
- ▲ Met Mast Locations Permanent
- ▲ Met Mast Locations Operating
- Substation Locations
- Microwave Tower
- Construction compound / Laydown Area / Batch Plant
- O&M Facility
- Laydown Area
- Approved Internal Transmission Line
- - - Access Tracks
- ▭ Proposed Site Boundary
- ▭ Proposed Indicative Development Corridor
- ▭ PRU Development Corridor
- ▭ CWO REZ Transmission Corridor



ID Summary of Key Changes Proposed by the Mod-3 Application

- | | |
|----|--|
| 1 | Removal of approved External Transmission Line to Ulan and associated Site Access Points (removal of 40). Project will connect into the Central-West Orana REZ Transmission Line developed by EnergyCo |
| 2 | Removal of 4 x turbines and associated Development Corridor and Site Access Points following landowner feedback |
| 3 | Removal of 7 x turbines and associated Development Corridor and Site Access Points following landowner feedback |
| 4 | Removal of 1 x turbine and associated Development Corridor following landowner feedback |
| 5 | Removal of Turee Vale Road from Project following landowner feedback |
| 6 | Removal of State Forest Road from Project following landowner feedback |
| 7 | Removal of Wind Farm Development Corridor no longer required |
| 8 | Relocation of 6 turbines (greater than 100 m) for constructability and energy yield purposes |
| 9 | Relocation of substation following landowner feedback |
| 10 | Additional Development Corridor to facilitate an optional access track (Option B) for constructability purposes |
| 11 | Inclusion of Public Road Upgrade Development Corridor to ensure all environmental constraints can be assessed in design |
| 12 | Inclusion of up to 7 communication towers across the Project site to provide option for an alternate communications pathway between substations |
| 13 | Additional Development Corridor to facilitate a continuous internal access track along the internal transmission line |
| 14 | Changes to optional permanent met mast locations due to revised turbine layout. Total of 13 optional locations identified (increased by 2) |
| 15 | Changes to Wind Farm Site Access Points (SAPs) for constructability and sight line purposes. Relocation of 12 SAPs. Total of 25 Wind Farm SAPs (removal of 14) (includes 1 of 2 x optional SAP locations 10/10a) |



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2.0 Analysis of Submissions

2.1 Breakdown of Submissions

During public exhibition, a total of 22 submissions were received. **Table 2.1** provides a breakdown of the submissions received.

Appendix 1 includes the detailed Submissions Register.

Table 2.1 Submissions Breakdown

Category	Group	Number of Submissions
Government	State Government Department/Agency	10
Government	Local Government (Councils)	4
Community	Stakeholder Groups	2
Community	Community Members/Individuals	6
Total		22

2.1.1 Government Agency Submissions

As outlined in **Table 2.1**, ten state government submissions and four Council submissions were received from the following departments/entities:

- Renewable Energy Biodiversity Support (REBS), Conservation Planning and Offsets Division within Conservation Programs, Heritage and Regulation (CPHR)
- Heritage NSW
- Heritage Council of NSW
- NSW National Parks and Wildlife Service (NPWS)
- NSW Environmental Protection Authority (EPA)
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group
- Crown Lands
- Civil Aviation Safety Authority (CASA)
- Transport for NSW (TfNSW)
- NSW Telco
- Warrumbungle Shire Council (WSC)
- Upper Hunter Shire Council (UHSC)
- Mid-Western Regional Council (MWRC)
- Muswellbrook Shire Council (MSC).

None of the state government entities objected to the Mod-3 Application, however, further information or clarification regarding some aspects of relevant assessments were requested. The content of the government agencies and local Council submissions is discussed in further detail in **Section 4.0**.

2.1.2 Community Submissions

During the exhibition period, a total of eight community submissions were received. Two of the community submissions were received from organisations (Uarbry Tongy Lane Alliance Inc and CWO REZist Inc) and six submissions from individuals. All submissions objected to the Mod-3 Application.

In accordance with the Submissions Report Guideline (DPHI, 2026), submissions were analysed based on proximity to the Project Boundary to assess the level of community interest across the following categories:

- local area – within 5 km from the Project Boundary
- regional area – between 5 km and 100 km from the Project Boundary
- broader community – more than 100 km from the Project Boundary.

It is noted that some objectors identified as being located within the Coolah postcode may be located at distances greater than 5 km from the Project Boundary, as the geographical extent of the Coolah suburb extends beyond the 5 km radius. The analysis by suburb is therefore conservative in its approach as further interrogation of locality is not possible without detailed location data.

As illustrated on **Figure 2.1**, the analysis showed that of the eight unique community submissions received:

- six submissions (75%) from the local area
- one submission (12.5%) from the regional area
- one submission (12.5%) from the broader community.

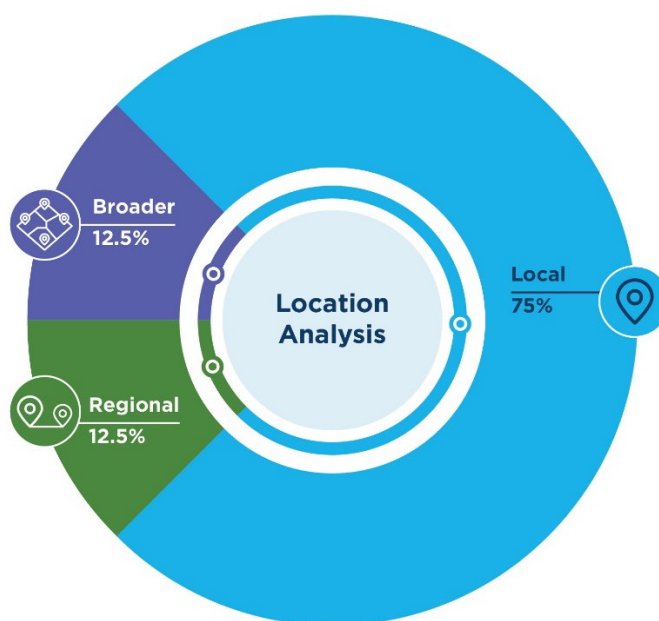


Figure 2.1 Submissions Analysis



How submissions are characterised

	Local area <5km from the project
	Regional area approximately between 5 - 100 km from the project
	Broader community greater than approximately 100km from the project site

Figure 2.2 Location Analysis

2.2 Categorisation of Issues

In accordance with the Submissions Report Guideline (DPHI, 2026), issues raised in the objecting submissions were grouped into the following categories:

- economic, environmental and social impacts of the Mod-3 Application (e.g. amenity, traffic, etc.)
- the LRWF Project (as modified) (e.g. the site, the Project Boundary, the physical layout and design, key uses and activities, timing)
- procedural matters (e.g. level or quality of engagement, compliance with DPHI requirements, identification of relevant statutory requirements and consultation process)
- justification and evaluation of the Mod-3 Application (e.g. consistency with Government plans, policies or guidelines)
- issues that are beyond the scope of the Mod-3 Application (e.g. broader policy issues), or not relevant to the Mod-3 Application (e.g. wind farms/renewable energy in general, issues beyond proposed changes to the LRWF Project).

These categories were then divided into themes and sub-themes where relevant to provide greater definition of the issues raised. Economic, environmental and social impacts of the Mod-3 Application (n=28) were the most frequently raised category of issues in the objecting submissions (refer to **Figure 2.3**). The other categories included justification of the Mod-3 Application (n=5), the LRWF Project (as modified) (n=5), issues beyond the scope of the Mod-3 Application (n=5) and procedural matters (n=1).

It should be noted that the submissions each raised multiple issues across multiple categories, resulting in a larger number of issues compared to the total number of unique community submissions. Example quotes from objecting submissions are included in **Section 5.0**, with a response to each issue.

2.2.1 Economic, Environmental and Social Impacts

There were 10 key themes to the economic, environmental and social issues raised in the objecting submissions as shown on **Figure 2.3**. A response to the issues raised in relation to these themes is provided in **Section 5.1**.

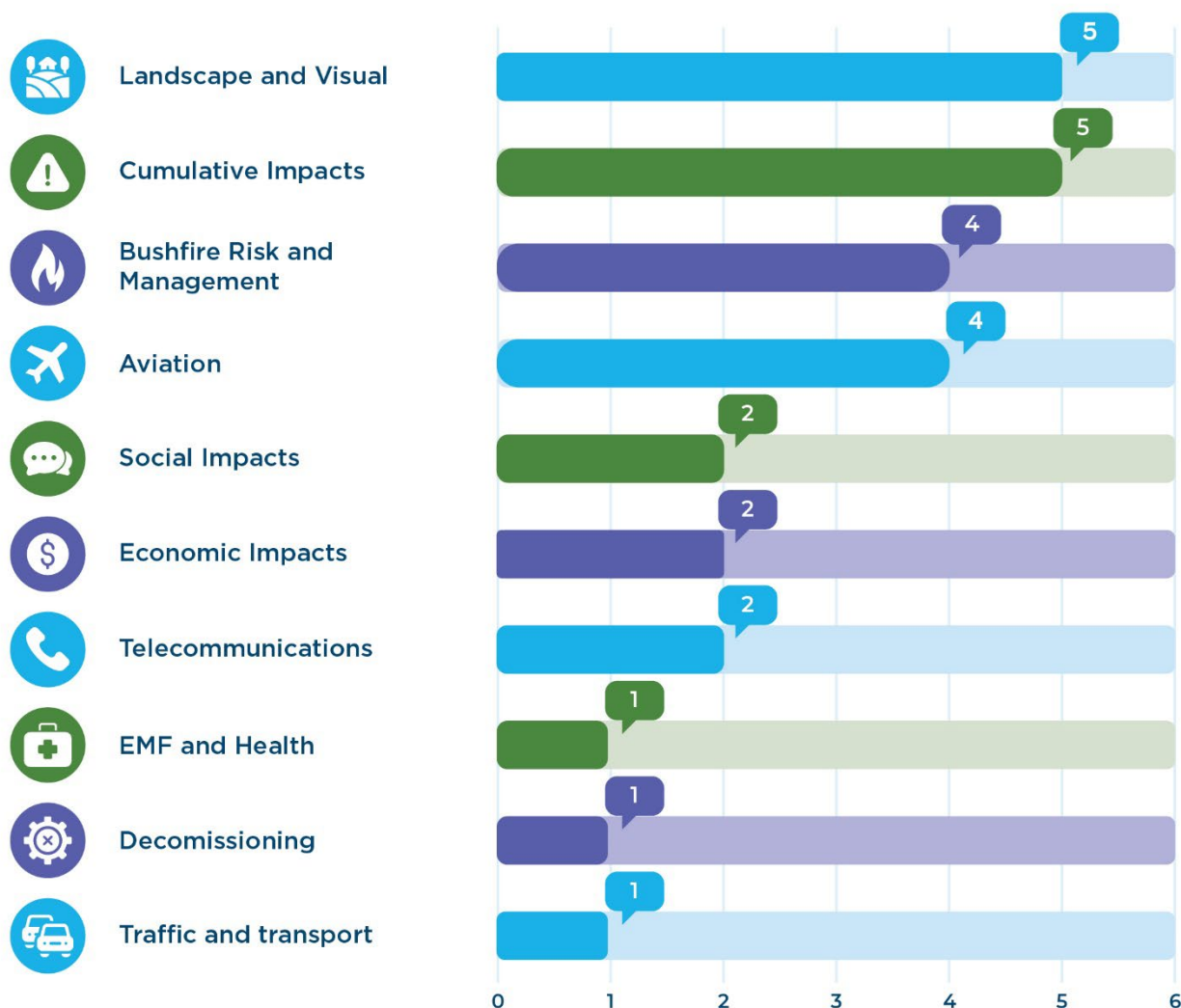


Figure 2.3 Economic, Environmental and Social Impacts by Theme

2.2.2 Justification and Evaluation

Issues regarding the justification and evaluation of the Mod-3 Application were raised five times in the objecting public submissions and relate mainly to the application of relevant legislation and the resulting justification for the Mod-3 Application as outlined in the Modification Report. Responses to objections raised in relation to the justification and evaluation of the Mod-3 Application are addressed in **Section 5.2**.

2.2.3 The Mod-3 Application

Issues relating to the Mod-3 Application were raised in five community submissions. The key themes related to the design and refinements relating to the Mod-3 Application. Responses to objections raised in relation to the Mod-3 Application are addressed in **Section 5.3**.

2.2.4 Procedural Matters

This category includes procedural matters such as the level of engagement and identification of relevant statutory requirements. Procedural matters were raised in one submission relating to the level of engagement undertaken not just by the Applicant Tilt Renewables but also DPHI and the disengagement of the community due to the volume of projects currently proposed in the region. Responses to objections raised in relation to procedural matters are addressed in **Section 5.4**.

2.2.5 Issues Beyond the Scope of the Mod-3 Application

This category includes broader policy issues or issues that are not directly related to the Mod-3 Application or its merits. Issues that were beyond the scope of the Mod-3 Application were raised in five of the objecting public submissions generally relating to general objection to broader renewable energy legislation and guidelines. Responses to objections raised in relation to issues beyond the scope of the Mod-3 Application are addressed in **Section 5.5**.

3.0 Action Taken Since Exhibition

3.1 Ongoing Consultation

The Applicant has implemented a comprehensive Stakeholder and Community Engagement Plan (SCEP), which guides consultation for the LRWF Project, including consultation undertaken for the Mod-3 Application. Continued communication in relation to the progress of the Mod-3 Application during the submissions phase is provided via the LRWF Project website

<https://tiltrenewables.com/portfolio/liverpool-range-wind-farm/>.

All stakeholders can also directly contact the Project Team through the Project phone number and email address or in-person at the Project shopfront in Coolah, contact details outlined below.

Tilt Contact Details
Coolah Shopfront: 50 Binnia Street, Coolah (Tuesday to Thursday 8.30am to 4.30pm) Email: liverpoolrangewindfarm@tiltrenewables.com Phone: 1800 WE TILT (938 458)

Targeted consultation with relevant government agencies has also been undertaken to inform the development of this Submissions Report. Further consultation undertaken during the preparation of this Submissions Report is outlined in the following sections.

3.1.1 Community Consultation

Consultation undertaken with the local community since the public exhibition process commenced on 14 April 2026 to keep them informed about the Mod-3 Application has included:

- An email to the Project mailing list on 28 April 2026.
- Updates to the Project webpage.
- Responding to enquires made at the Project shopfront.

3.1.2 Government Agency Consultation

The Applicant has undertaken further consultation with the government agencies outlined in **Table 3.1**.

Table 3.1 Government Agency Consultation

Government Agency	Key Discussion Points
CPHR - Renewable Energy Biodiversity Support (REBS) (13 April and 13 May 2026)	• Agreed approach to addressing the CPHR submission. • Key changes required to BAM-C and assistance REBS team can provide in relation to checking inputs and errors. • Discussion regarding post approval requirements – management plans (Biodiversity and Bird and Bat Adaptive Management Plan).

Government Agency	Key Discussion Points
DCCEEW-Cwth (27 May 2026)	Agreed that the BDAR can be submitted as the supporting information for a request to vary the conditions of EPBC 2022/09416.
DPHI (14 May 2026)	Discussed approach to responding to submissions and confirmed timing.

3.2 Mod-3 Application Amendments and Refinements

No amendments or refinements have been made to the Mod-3 Layout since exhibition of the Mod-3 Modification Report.

3.3 Further Assessment

In response to submissions received from government agencies, the following specialist studies have been revised:

- Biodiversity Development Assessment Report (BDAR) Addendum (Addendum Report), refer to **Appendix 3**.
- Amended Aboriginal Cultural Heritage Assessment Report (Amended ACHAR), refer to **Appendix 4**.

In addition, the Noise Impact Assessment (NIA) has also been updated since exhibition, which is attached as **Appendix 5**. These updates to the NIA do not relate to the submissions received but were required to:

- Include additional sensitive noise receivers by expanding the geographic boundary of the NIA to align with the proposed operational compliance monitoring regime being developed by the Applicant.
- Updates to the tables in Appendix C and Appendix G of the NIA to rectify minor errors of the association status of several residences within the Approved Site Boundary, as the exhibited NIA had incorrectly identified these residences as non-associated.

Note the outcome of these updates does not result in any change to the conclusions in relation to potential noise impacts presented in the Mod-3 Application Modification Report.

The proposed consolidated management and mitigation table (previously attached to the Modification Report as Appendix C) is provided as **Appendix 2**, no changes to the proposed management and mitigation measures have been made during the preparation of this Submissions Report.

4.0 Response to Government Agency Submissions

Government agencies provide submissions that address matters within their respective areas of responsibility, which may be technical in nature. These submissions commonly identify issues for consideration by the consent authority and/or propose consent conditions to be included in project approvals, should approval be granted. In the case of the Mod-3 Application no additional issues or assessment requirements have been identified.

The following section responds to the comments included in each of the government agency submissions. The wording of each submission is reproduced in text boxes, with a corresponding response provided directly beneath.

4.1 Conservation Programs, Heritage and Regulation Group (CPHR) – Conservation Planning and Offsets Division - Renewable Energy Biodiversity Support (REBS)

As noted in **Section 3.3**, an Addendum Report has been prepared to address two submissions received from REBS, refer to **Appendix 3**. The initial submission (Submission A) dated 30 April 2026 was received via the Major Projects Register and the second submission (Submission B) was received directly from the REBS team dated 14 May 2026. The second submission generally corresponds with the request outlined in Submission A however Submission B provides further detail. Both submissions have been addressed in the Addendum Report in detail, with summary provided below.

Recommendation 1: Address inconsistencies in the spatial data, Biodiversity Assessment Method Calculator (BAM-C) and BDAR to ensure the credit obligation is accurate

Up-date the spatial data, BDAR and BAM-C data for relevant vegetation zones to make them consistent (Table 1 below).

Table 1. Comparison between vegetation zones in BDAR, spatial data and BAM-C credit report areas (dated 24/04/2026).

Liverpool Range IBRA Sub-region			
Vegetation Zone	BDAR Table ES2	BAM-C	Spatial Data
VZ6 – 483 Mod Good	11.7	11.7	11.82
VZ8 – 483 DNG Low	274.5	274.5	307.82
VZ11 – 488 Low	166.3	166.23	165.6
VZ12 – 488 – Exotic	291.3	286.9	320.01
Pilliga IBRA Sub-region			
Vegetation Zone	BDAR Table ES3	BAM-C	Spatial Data
VZ7 – 483 Low	57.4	47.5	47.54
VZ8 – 483 DNG Low	131.9	131.4	146.12
VZ17 – 483 DNG	30.1	30.1	2.13

- Ensure the following vegetation plots are entered into the correct vegetation zones in the BAMC:
 - Plot 32409_007 has been mapped in the PCT483 Mod vegetation zone but has been entered into PCT483 Low in BAM-C (Case 00061449)
 - Plot 32409_033 has been mapped in Category 1 – Exempt land but has been entered into PCT483 Low in BAM-C (Case 00061449)

Recommendation 1: Address inconsistencies in the spatial data, Biodiversity Assessment Method Calculator (BAM-C) and BDAR to ensure the credit obligation is accurate

- Plot 32409_049 has been mapped in the PCT 488 Low vegetation zone but has been entered into PCT483 Mod Good in BAM-C (Case 00062450).
- Review vegetation zones based on VI scores and against the NSW Box Gum Woodland Critically Endangered Ecological Community (CEEC) Final Determination and the Commonwealth Guidelines for Box Gum Woodland CEEC.
- If changes are made up-date the assessments for Serious and Irreversible Impacts (SII) and Matters of National Environmental Significance (MNES) accordingly.
- Revise Figure 3.4 of the BDAR to show the location of acoustic recorders for forest owls and the koala.

The Addendum Report (refer to **Appendix 3**) outlines the review of the identified inconsistencies and amendments to the BAM-C data as requested by REBS, this review was undertaken in consultation with REBS. The review of the spatial data demonstrates a similar result to that presented in the BDAR (Umwelt 2026), while there is a residual minor difference in the final vegetation integrity (VI) scores calculated, Umwelt consider the outcomes of the plot analysis completed for the BDAR (Umwelt 2026) to be accurate as per the vegetation mapping submitted at lodgement. Umwelt has confirmed that as there are no changes to mapping of NSW Box Gum Woodland Critically Endangered Ecological Community (CEEC) as a result of this review. Additionally, there are no changes to the Serious and Irreversible Impact (SII) assessment or Matters of National Environmental Significance (MNES) Assessment provided in the BDAR (Umwelt 2026).

Figure 3.4 of the Mod-3 Biodiversity Development Assessment Report (Mod-3 BDAR) (refer to Appendix E of the Modification Report) identifies the location of the six acoustic recorders deployed for forest owls and the koala across the additional areas of the Proposed Development Corridor.

As per consultation meetings with REBS, this figure has been amended and included in the BDAR Addendum as Figure 2.1, to include the acoustic recorders that have been deployed as part of the additional Bird and Bat Utilisation Surveys (BBUS) that have been completed for the LRWF Project.

Recommendation 2: Provide additional spatial data to support review of species polygons Provide the following shapefiles to for the species polygon review:

- cliffline habitat with 2 kilometres of the development footprint for threatened microbats
- the location of acoustic recorders for forest owls and the koala
- species polygons that are clipped to the Mod 3 Indicative Development Footprint
- locations where direct impacts will be avoided in the transmission line easement
- locations that were inaccessible during the survey period
- review Tab-4 of the Pilliga BAM-C Cases to ensure that the exclusion of the South-eastern Glossy Black-cockatoo is consistent across cases

The spatial data requested has been reviewed and updated and will be submitted to REBS with the Addendum Report for review.

Recommendation 3: Delineate ‘no impact’ and ‘partial clearing’ areas in spatial data and within the BDAR

- Provide mapping showing ‘no-impact’ where the transmission line spans areas and partial-loss areas to support the impact assessment and avoidance measures documented in the BDAR, survey effort and post approval verification.

Recommendation 3: Delineate ‘no impact’ and ‘partial clearing’ areas in spatial data and within the BDAR

- In the BDAR justify the assumption that no ground disturbance or vegetation clearing will occur in the ‘no-impact’ transmission line spanning areas.
- Describe no-clearing zones in the BDAR, for example where transmission line towers span above the height of existing vegetation. This supports the discussion on avoidance and mitigation in section 5 and partial loss assessment in section 6.1.2.
- The BDAR does not provide guidance for how to achieve the predicted partial loss scores in Table 6.6 or recommendations for how future VI scores will be verified. The BDAR should be updated to provide examples of clearing methods to support achievement of the predicted future VI scores. We expect a partial loss verification protocol will be prepared and included as an approval condition.

Balance of Easement (BoE) mapping has been provided to REBS as requested. The mapping demonstrates the extent of the BoE which was assessed for partial-loss for vegetation >4 m in height, and no impact for vegetation <4 m in height.

As a precautionary approach, the Mod-3 BDAR considers the full extent of vegetation zones >4 m in height within the BoE will be subject to partial loss impacts. While indicative locations have been provided to CPHR where direct impacts (including partial loss) will be avoided at points where the transmission line infrastructure and associated easement crosses valleys, the Applicant and its design consultants confirm that impact avoidance can only be verified once a construction contractor has been selected and detailed design has been completed. As such, the impact areas presented in the Mod-3 BDAR are inherently conservative compared to the anticipated actual impact across the BoE.

In accordance with Schedule 3 of the Development Consent, a comprehensive strategy to mitigate unavoidable impacts of the Mod-3 Application will be required. Additionally, in accordance with Condition 21 (c)(vii) of the Development Consent a Biodiversity Management Plan (BMP) will be prepared and implemented prior to construction commencing. This condition includes requirements for partial clearance areas to be monitored within three months of the clearance occurring and that a verification report is to be provided to confirm if any changes are required to the BMP. The Mod-3 Application also requests the relevant Development Consent condition to be amended to increase the verification window period to be within six months after clearing to mitigate potential safety concerns during construction

4.2 Heritage NSW – Aboriginal Cultural Heritage

As noted in **Section 3.3**, an Amended ACHAR has been prepared to address the submission from Heritage NSW. The Amended ACHAR is attached as **Appendix 4** with a summary response to each comment provided in this section.

Proposed impacts to culturally modified trees

Notwithstanding the project’s stated commitment to avoid 22 Aboriginal sites and/or areas of archaeological sensitivity, the proposed modification would directly impact five (5) culturally modified trees assessed as being of high archaeological significance, including two currently approved for avoidance under the existing consent (Collieblue [AHIMS 28-6-0022] and LRWF ST 3 [AHIMS 36-3-4173]). The ACHAR acknowledges that impacts to these sites would represent 19.2% of the extant culturally modified tree resource within the AHIMS search area, representing a significant regional impact (pg.182), yet then concludes that salvage/removal is “an appropriate management option” (pg.188).

Proposed impacts to culturally modified trees

Heritage NSW considers this position to be inconsistent with the RAP consultation outcomes reported in Section 7.1, which identify culturally modified trees as particularly significant and requiring protection, and with the statutory objectives established under the National Parks and Wildlife Act 1974 and the Environmental Planning and Assessment Act 1979, which prioritise avoidance of harm to highly significant Aboriginal objects. In the absence of a documented avoidance options analysis, it is unclear whether all reasonable and feasible avoidance measures have been exhausted or whether salvage is justified. To address this, Heritage NSW requests that:

- a. All culturally modified trees proposed for impact be subject to further inspection and assessment to confirm whether scarring is cultural or natural in origin. As per Requirement 23 of Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) the recording of the site must be consistent with Aboriginal scarred trees in New South Wales, a field manual (DEC and Andrew Long 2005). Where uncertainty remains, independent arborist advice should be sought.
- b. Where trees are confirmed to be Aboriginal objects, demonstrate through a documented options analysis that all reasonable and feasible avoidance measures have been investigated and exhausted, prior to proposing any harm-based management approach.

Umwelt has undertaken further targeted inspection of the five (5) trees reported in the Mod-3 Application ACHA that had been previously recorded as having potential cultural modification. A specialist arboriculturist (Urban Tree Management Australia Pty Ltd) was engaged to inspect the trees and provide a condition assessment of each of the trees and options for long term management and/or avoidance solutions, if required.

The results of the inspection concluded that wounding exhibited on three (3) recorded trees ('LRWF ST 2' (AHIMS ID #28-6-0080), 'LRWF ST 3' (AHIMS ID #36-3-4173) and 'Collieblue' (AHIMS ID#28-6-0022)) are not the result of cultural modification (i.e. intentional bark removal) and instead resulted from natural processes including multi-phase insect damage, limb fall/tear-out and or longicorn beetle boring attack, respectively.

One tree recorded as 'Quindalup 2' (AHIMS ID # 28-6-0021) could not be located during the inspection. Reference to the description recorded on the AHIMS site card indicated that the site had been recorded in the 1980s and comprised a deceased tree. Visual inspection of both the recorded location and surrounds suggested that the remains of the tree have since been removed.

Urban Tree Management Australia Pty Ltd confirmed that the site recorded as 'Quindalup' (AHIMS ID # 28-6-0020) exhibited wounding characteristic of cultural modification. Impact to this site will be avoided and will require ongoing management. Management will include fencing and/or barricades and a program of inspection to provide an ongoing assessment of the fence / barrier condition and an indication of tree condition. These management measures will be included in the Heritage Management Plan as per Schedule 3 Condition 24 of the Development Consent.

Clarification of survey findings for previously recorded scarred trees

Reinspection of the previously recorded culturally modified tree sties LRWF ST 3 (AHIMS 36-3-4173) and Quindalup (AHIMS 28-6-0020) indicates that RAPs and the archaeologist concluded the likely causes of damage/scarring were vehicle impact and insect predation, respectively. However, no supporting discussion or evidence has been provided to substantiate these conclusions. Further, despite these findings which suggest the trees may not be Aboriginal objects, the significance assessment in Table 7.2 continues to assess both trees as being of high archaeological significance, resulting in an internal inconsistency. To address this, please:

- a. Provide clear justification and supporting evidence for the conclusions reached regarding the causes of damage (including RAP input and archaeological reasoning).

Clarification of survey findings for previously recorded scarred trees

- b. Clarify whether the trees are considered Aboriginal objects, with reference to the above evidence.
- c. Review and amend the significance assessment in Table 7.2 and other relevant sections of the report (including the impact assessment) to ensure consistency with the conclusions.

As outlined above, AHIMS ID #36-3-4173 has been re-inspected and it has been confirmed that the modification is a result of natural processes likely to be limb fall/tear-out.

The additional arborculturalist inspection and assessment of AHIMS ID # 28-6-0020 indicates this site does exhibit wounding characteristic of cultural modification. Therefore, impact to this site will be avoided and appropriate management and mitigation applied. The Amended ACHA has been updated to reflect the results of the additional inspection and revised impact assessment (refer to

Appendix 4).

Clarification of survey findings for previously recorded scarred trees

Figure 4.1 identifies a culturally modified tree (AHIMS 28-6-0083) which, based on the scale of mapping provided, appears to be located within the approved Development Corridor; however, this site has not been included in the impact assessment. Please clarify whether this site is within the proposed impact area, confirm its proximity to proposed works, and identify whether protective or avoidance measures are required.

AHIMS 28-6-0083 is located outside the Site Boundary and will not be impacted by the LRWF Project, including the Mod-3 Application.

Figure 4.1 of the Amended ACHA (refer to **Appendix 4**) has been updated to include an inset zoomed to the location of the site.

Completeness and Consistency of Significance Assessment

The significance assessment presented in Section 7.5 does not address all Aboriginal sites within the proposed modified Development Corridor. This section must include significance assessments for all newly identified sites and a summary of the significance assessments for previously recorded sites, including any proposed revisions. For previously recorded sites, it may be appropriate to reference earlier assessments or reports where detailed significance assessments have already been provided and include only a summary in this section. For PAD, either provisional significance assessments should be provided, or it should be clearly stated that their significance remains unknown. To address this, please:

- a. Update Section 7.5 to include all Aboriginal sites within the proposed modified Development Corridor
- b. Provide provisional significance assessments for PAD or clearly acknowledge where significance cannot yet be determined.

Section 7.5 and the significance assessments for PAD have been updated in the Amended ACHA, refer to **Appendix 4**.

Completeness and Consistency of Significance Assessment

There is an internal inconsistency within the ACHAR in the assessment of the scientific (archaeological) significance of culturally modified trees. The impact assessment (Table 8.3) identifies these sites as being of moderate archaeological significance, whereas the earlier significance assessment in Section 7.5 (Table 7.2) identifies the same sites as being of high archaeological significance. To address this, please:

- a. Review and reconcile the archaeological significance ratings for culturally modified trees to ensure consistency across Sections 7.5 and Section 8.3 of the ACHAR.

Completeness and Consistency of Significance Assessment

b. Provide a clear justification for any changes in the significance assessment ratings proposed based on the current assessment.

As outlined above, the previously reported modified trees have been subject to further inspection and assessment with the significance assessment updated accordingly (refer to **Appendix 4**).

Management measures – test excavations

Section 9.3.2 (Test Excavation Program) requires additional information to improve clarity regarding decision-making processes and implementation. While the methodology identifies hold points for ceasing testing (e.g. high artefact densities, shell, skeletal remains, contact archaeology or historical relics), further detail is required to clearly explain what specific outcomes would trigger escalation from test excavation to more controlled salvage excavation, how the spatial extent of testing will be determined and how certain areas will be cleared for construction. To address this please update Section 9.3.2 to:

- a. Clearly define the criteria and decision-making triggers for escalation from test excavation to salvage excavation.
- b. Clarify the methodology for ceasing or continuing testing spatially within an area, including responses to sterile testing results or the continued recovery of artefacts. This should specify whether testing is intended to define site extents only within the impact footprint or more broadly.
- c. Include a requirement for submission of an Aboriginal Site Impact Recording Form (ASIRF) and/or AHIMS site card updates, following test excavation.
- d. Identify clear hold points and processes for clearance of areas for construction and/or for the development and approval of any required salvage excavation strategy.

Section 9.3.2 of the Amended ACHA (refer to **Appendix 4**) has been revised to include the information requested.

Aboriginal Heritage Information Management system (AHIMS) site cards

A number of PAD sites are stated as (AHIMS Pending). Please confirm that these have now been registered on AHIMS to facilitate future management.

The results of the assessment indicated that the area of PAD associated with Talbragar 1 (AHIMS 36-2-0077) has been extended north and south of the original area. Please confirm that a site card update has been submitted to capture this result on AHIMS.

All relevant AHIMS site cards have been updated to reflect the revised assessment outcomes.

Aboriginal community consultation

Please provide evidence that all consultation documentation for the current Modification was provided to A1 Indigenous Services and Gallangbang Aboriginal Corporation, as this is not clearly demonstrated in the material included in Appendix B.

It is noted that consultation material was provided to Mudgee Local Aboriginal Land Council (LALC) and that representatives of this organisation participated in the additional survey work; however, Mudgee LALC is not listed as a RAP for the project in Section 3.2. Please clarify this discrepancy and confirm whether the list of RAPs requires updating to ensure accuracy.

The consultation log has been reviewed. A1 Indigenous Services and Gallangbang Aboriginal Corporation have been provided with all assessment documentation.

Omission of Mudgee LALC in the RAP list was an error, this has now been amended (refer to **Appendix 4**).

4.3 Heritage Council of NSW

General Comment

Section 6.4 of the Modification Report states that the proposed modification will not result in any additional impact to environmental heritage, and that works will now avoid impact to TL LU2/H1 (European Midden). Heritage NSW has no comment regarding assessment provided in the Modification Report or the proposed modification at this time.

The comments from the Heritage Council of NSW are noted.

4.4 NSW National Parks and Wildlife Service

General Comment

NPWS understands that the subject modification removes the need for the Approved External Transmission Line and associated connection infrastructure from the Project. Connection to the grid will be facilitated via the approved CWO REZ 330kV Transmission Line (SSI-48323210), which while will still require access through Durridgere SCA, it will reduce the area of clearing and need for two transmission lines through the park.

Connection via the CWO REZ Transmission Line is preferred by NPWS as it has a significantly reduced impact on Durridgere SCA compared to the Project's External Transmission Line.

As a result of this change, NPWS requests that access to, or construction works on Durridgere SCA is not to be undertaken as part of the project.

The Mod-3 layout does not interact with the Durridgere State Conservation Area (SCA), therefore access to or construction works in the Durridgere SCA will not be required for the LRWF Project.

4.5 NSW Environment Protection Authority (EPA)

Environment Protection Licence

Based on the information provided, the proposal will require an environment protection licence under section 43 of the Protection of the Environment Operations Act 1997 (POEO Act) for Electricity Generation clause 17 of Schedule 1 of the POEO Act.

This comment from the EPA is noted. As outlined in Section 4 of the Modification Report, Section 4.42 of the EP&A Act states that if an Environment Protection Licence (EPL) is required for a SSD, it cannot be refused if a development consent is granted and must be substantially consistent with the terms of any development consent granted for the development. Should the LRWF Project proceed an EPL will be obtained prior to the commencement of construction.

General Comment

The EPA has reviewed the modification report and understands there are no changes to the level of predicted noise impacts for non-associated residential receivers when compared to the development approval. The EPA also notes that the management and mitigation measures proposed under the approval remain appropriate to address any potential impacts. The EPA has no additional comments to provide on the modification.

The comments from the EPA are noted.

4.6 NSW Department of Climate Change, Energy, the Environment and Water – Water Group

General Comment

The Modification Report has been reviewed by NSW DCCEEW Water Group and no issues in relation to water impacts have been identified. As noted in the mod report, the Mod3 Layout does not include any change to the water requirements or water sources associated with the Approved Development. The Project considers avoidance of waterway crossings as far as practicable and proposed management and mitigation measures applicable to the Approved Development will continue to apply to the Mod3 Application.

The comments from DCCEEW-Water Group are noted.

4.7 Crown Lands

Use or occupation of Crown Land

For the use and access of Crown Land, roads or waterways within the Project footprint the following considerations apply:

- Any use or occupation of the Crown Land during the assessment phase will require consultation with Crown Lands to obtain the necessary authority under the *Crown Land Management Act 2016* and/or the *Roads Act 1993*.
- If Crown roads are required for access, they may need to be transferred to Council or an application made to close and purchase the roads. Interim tenure may be required to avoid delay.
- Crown Lands note that there are several Crown Roads within the Project Area. These roads may provide legal access to the development but may not provide practical access.
- If the proposal necessitates the acquisition of Crown land/roads, this must be undertaken in accordance with the Land Acquisition (Just Terms Compensation) Act 1991 (LAJTC Act).
- Authority to use, traverse, access, or construct infrastructure on Crown Land and roads is required under the Crown land Management Act and/or the Roads Act 1993. It is recommended that the proponent contact Crown Lands as early as possible to discuss and initiate the necessary processes to authorise the use of and/or access to Crown land and roads. If infrastructure is to be built on Crown land or roads, consent from the Minister for Lands and Property (via Crown Lands) will be required. Constructed roads may also need to be transferred to Council.

The comments from Crown Land are noted. These requirements are consistent with the requirements associated with the Approved Development. the Applicant has commenced addressing these requirements in consultation with Crown Lands.

Use or occupation of Crown Land

In relation to Crown land tenures associated with the Modification 3 proposal, it is advised that Crown Licences 642770 and 643302 have been executed. Crown Licence 672177 is currently in draft and under internal review and has not yet been executed. The status of the draft licence does not affect the consideration of the Modification 3 proposal and is being progressed separately through the Crown Lands strategic leasing process.

The comments from Crown Lands are noted and the Applicant confirms that the application for the Crown Licence 672177 is consistent with the Mod-3 Application.

4.8 Civil Aviation Safety Authority

Aviation Safety

The Executive Summary in the Modification Report says:

"The Mod-3 Layout does not introduce new risks to aviation safety and confirms that the 173-turbine arrangement is acceptable. The Mod-3 Application would only require minor administrative updates to existing aeronautical charts, such as the Lowest Safe Altitude (LSALT) adjustments for route W411. Obstacle lighting and marking will be implemented in accordance with standard aviation safety requirements for structures of this height to ensure visibility to low-flying aircraft and emergency services."

The above is satisfactory.

The comments from CASA are noted.

Aviation Safety

From the Aviation Impact Assessment Technical Memorandum (AIATM); the following is noted:

There are 12 less turbines.

The tip height is up to 215 m above ground level (AGL) – no change.

The Wind Monitoring Towers have reduced in height from 169m to 140m.

The layout has changed.

The changes described above will not affect Aviation Safety.

CASA does not maintain a database of uncertified Aerodromes / Airplane Landing Areas. However, the impact on the flight circuits and the potential wake turbulence impacts described in the AIATM appear to be credible.

The comments from CASA are noted.

Aviation Safety

CASA concurs with advice, recommendations and descriptions in the AIATM; noting the following: The AIATM recommends that the condition 'aircraft detection lighting system' be removed from the development consent. Aviation Projects is the expert aviation consultant.

CASA is neutral on aircraft detection systems. There are a lot of factors that can go wrong in remote areas and it is expected that the system would need to be finely tuned and maintained. Generally, the radar detection system has not been successful in Australia. Anecdotally, we have heard that it has been successful elsewhere. CASA is not up with the latest technology for aircraft detection lighting systems.

For the record, there is no change to the previous CASA assessments. CASA still recommends obstacle lighting and notes that the AIATM advises "most critical WTGs would require lighting". Noting that Defence has recommendations regarding night vision.

The comments from CASA are noted. The effectiveness of technology in detecting and managing lighting for aviation safety as a risk treatment is unknown and there is no formal guidance within the Australian context on approved standards and approved systems. For this reason, the AIA recommends that the condition Schedule 3, Condition 3(d) of the Development Consent be removed. Lighting will be implemented in accordance with current Development Consent condition Schedule 3, Condition 3 and the AIA.

4.9 Transport for NSW

General Comment

Transport for NSW (TfNSW) has reviewed the Liverpool Range Wind Farm (LRWF) Modification 3 (Mod-3) Application, submitted via the Major Projects Portal in May 2026. TfNSW response is informed by the updated Traffic Impact Assessment (TIA) prepared by SMEC dated 26 February 2026. Based on this review, TfNSW confirms that the proposed modification includes:

- Reduction in the number of turbines from 185 to 173
- Removal of the External Transmission Line and associated access points
- Consolidation of Site Access Points (SAPs) from approximately 74 to 25
- Removal of State Forest Road and most of Turee Vale Road from the construction traffic network, and
- Updated construction staging and workforce assumptions.

TfNSW states that the TIA by SMEC (26 Feb 2026) shows that Mod 3's proposed changes show that the intersection upgrade that has been completed for the intersection of Golden Highway/Vinegaroy Road (BAL/CHR) will be able to accommodate the changed traffic assumption identified within this modification and will not require further mitigation measures or road upgrades. No further referral or information is required regarding LRWF Mod 3.

The comments from TfNSW are noted.

4.10 NSW Telco

Point to Point Link Obstruction

There is a NSWTA microwave point to point link passing through the proposed wind farm. The microwave link is between sites Queensborough Hill (ACMA Site ID 11283) and Coolah Tops (ACMA Site ID 10021216). ACMA link licence number is 10998213/1.

Requirements: Move Turbine E31 by minimum 15m south to avoid obstruction of the above microwave link.

We also note that turbine E31 was moved closer to the link path by approximately 15 m when comparing previous proposals (October 2023).

As outlined in Section 6.10.2 of the Modification Report, all existing point to point links within proximity or crossing the Proposed Site Boundary have been reviewed (including the link noted above). No obstruction, scattering effects or interference is expected to result from the Mod-3 Layout.

There are no turbine locations within the Mod-3 Layout that are encroaching on the second Fresnel zone of any of the existing links. This is in accordance with the Draft National Guidelines which recommends that as a conservative approach, wind turbines (including blades) should be placed outside the 2nd Fresnel zone of any point-to-point links.

4.11 Warrumbungle Shire Council

General Comment

Reducing the number of turbines and local road routes is noted. However, one should not assume that means roads to be used will experience fewer impacts. Quite the contrary, some roads will experience greater impacts than the existing, approved project (Mod -2), for example, Rotherwood Road, Coolah Creek Road and Pandora Pass Road. Council requires the current Conditions of Consent to be amended as documented in this letter to manage and mitigate these traffic and road impacts.

The comment from Warrumbungle Shire Council is noted and the associated change to road use proposed by the Mod-3 Application has been acknowledged and assessed in the Mod-3 Application Traffic Impact Assessment (TIA) (refer to Section 3.2.1 of the TIA). The Applicant remains committed to the required road upgrades to facilitate the construction of the LRWF Project, with the refinements to the timing of the works and associated consent conditions requested to provide a practical approach to the implementation of the works only.

General Comment

Proposals by the Developer to defer road upgrades until after completion/partial completion of the main Accommodation Camp are strongly opposed. Such roadworks must be undertaken and completed before such traffic activity.

The Applicant acknowledges Warrumbungle Shire Council's preference, however, it considers that the road upgrades can be delivered progressively in line with traffic demand and road safety risk. Construction traffic required to progressively deliver the early stages of the Accommodation Camp can be appropriately managed through careful staging of works and mitigation measures to be detailed in the Traffic Management Plan (TMP) and the Accommodation and Employment Strategy (AES), which will be developed in consultation with Warrumbungle Shire Council under the current conditions of consent.

A blanket requirement to complete all road upgrades prior to such activities is not considered necessary or practical, placing at-risk the LRWF Project's ability to meet critical project and contractual milestones, and in doing so adversely impacts project economics and timeline to deliver energy to the National Electricity Market. Road upgrades will occur in parallel with the progressive construction of the Accommodation Camp which will be used to house non-local workers required to construct the public road upgrades (where no local accommodation options are available) and the Accommodation Camp itself. This proposed approach provides a practical solution to address Warrumbungle Shire Council's concern in relation to potential impacts from the exclusive use of off-site accommodation to house the workers required to complete the road upgrades and construction of the Accommodation Camp.

General Comment

Council strongly opposes the proposal to 'ramp up' the extent of the Accommodation Camp 'progressively', using alternative off-site accommodation to fill any shortfalls in the camp capacity. The availability of hotel and motel accommodation in the district is already scarce and is needed to support tourism and general business activities. The full-scale Accommodation Camp should be built in one effort.

The Applicant acknowledges Warrumbungle Shire Council's concerns but considers that progressive delivery of the Accommodation Camp, aligned with workforce demand, is appropriate and standard

practice. It is also noted that the Accommodation Camp was proposed to be constructed under a staged approach and to mirror the ramp-up of the LRWF Project's construction workforce when initially included under the Mod-1 Application.

The use of alternative off-site accommodation is intended to be limited and supplementary and only required during the initial construction of the Accommodation Camp itself and the concurrent public road upgrades. This would include the use of existing accommodation providers and/or existing local workforce accommodation facilities, or a combination of both, and further detail will be provided in the AES.

Community feedback received via the Project Shopfront and through preliminary consultation undertaken to inform the AES has included expressions of interest in hosting the Project workforce. These expressions of interest have included hosting mobile accommodation – such as caravans – on private property, as well as making housing which is not currently available on the private rental market available to the Project workforce for lease.

A single-stage delivery requirement is not considered necessary and likely to result in inefficient and underutilised infrastructure and perverse accommodation outcomes. Requiring full delivery of the Accommodation Camp in a single-stage may in effect accelerate or increase the need for a higher number of beds to house the workforce required to construct a full Accommodation Camp under a single-stage construction program. This approach also has the potential to materially extend the overall construction program due to the sequential progression of each scope of works (public road upgrade works, then full delivery of the Accommodation Camp, then wind farm works), placing at-risk contractual and program milestones and project economics. A staged approach to reflect actual workforce is typical of workforce camps within the industry.

Road, Traffic and Transport

As the roads authority under the Roads Act 1993, Council requires all road upgrades and maintenance, safety measures and traffic management plans to be formally approved by it. This is necessary because if unmanaged, impacts will arise in terms of road safety from increased traffic volumes (including light vehicles), as well as road asset wear and tear and reduction in effective life due to heavy vehicles, and in the case of unsealed roads, also due to light vehicles which contribute to gravel loss.

The Applicant acknowledges Warrumbungle Shire Council's role as Roads Authority and agrees that road upgrade designs will be submitted for Warrumbungle Shire Council review and approval through Section 138 (s138) of the *Roads Act 1993*. In accordance with the Development Consent (Schedule 3, condition 31), the TMP will be developed in consultation with Warrumbungle Shire Council for the approval of the Planning Secretary. However, Tilt does not support a blanket requirement for approval by Warrumbungle Shire Council of all maintenance and traffic management activities, as this would capture routine or low-risk activities unnecessarily. A structured approach whereby the roads authority reviews the road upgrade/repair designs and grants s138 approvals, and also provides critical input into the TMP for approval by the Planning Secretary, is considered more appropriate and consistent with standard practice for State Significant Developments.

The LRWF Project will be providing significant investment to improve the existing condition of Vinegaroy and Rotherwood Roads and there is an existing Development Consent condition requiring roads to be repaired or made good (Schedule 3, Condition 29 (b)) during the construction period. Given these requirements, the Applicant maintains that existing road conditions will not be of a lower standard than what currently exists. The Applicant will undertake a dilapidation survey of the roads that will be repaired/upgraded prior to the commencement of construction of any public road

upgrades/repairs in order to inform any comparison of road pavement condition before and after commencement of the public road works. In addition, the Applicant will provide substantial ongoing annual contributions under a Voluntary Planning Agreement (VPA) agreed with Warrumbungle Shire Council to be allocated to the ongoing repair/maintenance of the roads upgraded/repared as part of the LRWF Project to minimise risk to Warrumbungle Shire Council throughout the operational life of the LRWF Project.

In terms of safety, the design itself is a safety improvement i.e. widened lanes and shoulders, replacement or improvement of drainage, pavement rehabilitation, etc. Other safety upgrades have also been made where feasible and within the constraints of the road corridor.

Road, Traffic and Transport

Council requires that the Project's construction works, be it the main Accommodation Camp or the wind generation infrastructure, not commence until the required Transport Strategy and Traffic Management Plan have been approved by the Department, in consultation with Council.

The Applicant agrees that a Transport Strategy will be prepared and approved prior to commencement of the construction phase. TMP(s) will be staged with each revision or iteration relevant to a specific stage of works. This approach is, subject to Planning Secretary approval, facilitated by the Development Consent and is common practice for major projects where discrete packages or works require specific measures in place. At this stage the Applicant expect an overarching TMP to be prepared, with specific sub-plans prepared in relation to the staged roll-out of public road upgrades, wind farm balance of plant (BOP) civil and electrical works, and to accommodate oversize/overmass (OSOM) traffic movements related to turbine and transformer component haulage.

Road, Traffic and Transport

Council opposes the proposition that public road upgrades be decoupled from the critical path for main construction (including the main Accommodation Camp) to commence, in essence so they can occur in parallel and in a staged fashion. This poses major risks in terms of road upgrades not being delivered as and when they are needed for safety, or potentially not being delivered at all.

The Applicant is acutely aware that upgrade and repair of the local public roads providing access to the LRWF Project are required to enable the safe passage of Project-related construction and OSOM vehicles and to ensure the safe and efficient operation of the road network for other road users. The Applicant has been working collaboratively with Warrumbungle Shire Council on progressing detailed public road upgrade designs as part of the s138 application process. Delivering a context sensitive design commits to prioritising safety and efficiency of the road network and effectively balances critical LRWF Project considerations (e.g. project economics and maintaining delivery program) and the requirements of the relevant design standards.

As such, public road upgrades to Vinegaroy and Rotherwood Roads are planned to commence in late 2026 and be completed in 2027, ahead of peak construction traffic. The Applicant maintains that road upgrades can be delivered progressively and, where appropriate, in parallel with construction works, provided traffic risks are appropriately managed. Sequencing and controls will be addressed through the Transport Strategy and TMP, rather than a prescriptive requirement to complete all upgrades prior to construction.

As noted above, this approach of the Accommodation Camp being delivered progressively commensurate with the ramp-up of wind farm works and the associated construction workforce is consistent with the staged approach presented in the approved Mod-1 Application.

Road, Traffic and Transport

Council also objects to the removal of pre-works dilapidation surveys. These surveys serve as a baseline for pavement condition assessments and are needed to resolve disputes in event of pavement failure or performance issues. Council also requires the baseline dilapidation surveys after road upgrades to remain, as is proposed by the Developer.

The Applicant accept that the pre-works dilapidation survey can remain and will be undertaken on an as required basis for relevant segments of road. The Applicant would like to clarify that the pre-works dilapidation survey would become the baseline for the LRWF Project.

After road upgrades are completed, The Applicant intends to utilise the contractual mechanism for recording Practical Completion of road upgrade packages and associated as-built surveys will then be used as a record for those upgraded sections rather than a separate dilapidation survey.

Road, Traffic and Transport

Council appreciates the developer has removed State Forest Road and Turee Vale Road from the project access footprint. References to these roads can be removed from the consent conditions, provided there remains a provision for upgrading of the Turee Vale Road vehicular crossing point / site access point the Project requires where the transmission line goes over the road.

The Applicant confirms that Turee Vale Road will only be upgraded at the defined transmission line crossing points (e.g. SAP 132 and SAP 51) and will not be used as a direct access route for the LRWF Project. References to these roads as access routes can therefore be removed, noting that the upgrade works are limited to the specific location of the crossing point on Turee Vale Road.

Road, Traffic and Transport

Because Turee Vale Road or State Forest Road are to no longer be used, Mod-3 is likely to substantially increase impacts along most of the other project roads which provide sole access to each Cluster, including Vinegaroy Road, Coolah Creek Road, Rotherwood Road, Pandora Pass Road and other minor local roads. This conclusion is reached when compared with the approved baseline which consists of the approved LRWF Mod-2 project, along with the optional use of the Rotherwood Road LRWF Quarry approved under separate Major Project SSD-68063715.

The Applicant agrees that traffic previously assigned to Turee Vale Road and State Forest Road will be redistributed across the LRWF Project road network and was therefore incorporated into the Mod-3 Application Traffic Impact Assessment (TIA) (refer to Section 4.2.1 of the TIA).

These updated traffic volumes have been used in the design of the impacted public roads and form the basis of the proposed upgrade scope which is currently being worked through in consultation with Warrumbungle Shire Council.

Road, Traffic and Transport

The traffic volumes summary in the Mod-3 Appendix G Traffic Impact Assessment, Table 14, is potentially misleading as it shows a range with reduced peak daily volumes along Vinegaroy Road and Rotherwood Road, rather than total project volumes. The peak daily reduction is a relevant consideration but not without also considering total traffic volumes over the entire construction, operation, upgrading and decommissioning phases. The peak daily reduction in traffic on these two roads appears to be due to the On-Site Quarry scenario, however that scenario remains optional (ie may not occur), and the increase in construction duration from the previous 4 years (Mod-1) to now 4 years 9 months.

Road, Traffic and Transport

Appendix G Tables 10 and 11 better show the very large magnitudes of vehicles using each of these roads, which more closely agree with Council's estimated 'actual likely' volumes for the total project than was forecast by previous Mod reports

The Applicant does not agree that Table 14 is misleading. Table 14 provides a summary of peak daily traffic volumes derived from detailed results (Tables B2 and B4), with total traffic volumes presented elsewhere in the Mod-3 Application TIA (including Appendix G Tables 10 and 11).

Peak daily values are an appropriate and standard metric for assessing maximum traffic impacts and informing design. Updated peak values reflect revised construction staging and methodology, not an omission of traffic volumes. All relevant volumes have been incorporated into the road upgrade design which is currently being worked through in collaboration with Warrumbungle Shire Council.

Strengthening Protection of Local Roads from Unauthorised Use

Council wishes to see the Department strengthen the Roads and Traffic Conditions of Consent in relation to REZ traffic using unauthorised access routes. The roads and traffic related Conditions of Consent issued for Mod 3 require strengthening because:

1. The current Traffic Management Plan scope has generalised 'measures to minimise impacts' which are typically discretionary and a 'wish list', and is silent on explicitly requiring definitive measures that will materially and definitively prevent unauthorised road access. Council submits additional requirements are essential, including real time traceability of traffic movements and substantial consequences for developers if their traffic uses unauthorised routes. Responding after a non-compliance roads event is way more costly than having the developer do more to prevent such behaviour.
2. REZ traffic on roads not authorised for such use materially increases road safety risks because such roads are of a minor/inferior standard, with profound damage generated from inappropriate use;
3. Heavy/OSOM vehicles using unauthorised access routes rapidly damage the condition of the road pavement;
4. Reporting non-compliances to the DPHI Compliance Team for investigation is too slow a response strategy. Reason being, significant and costly damage can be incurred by a local road within a few days of improper use. Council cannot afford these breaches to run for weeks as is currently the case. In that scenario, Local Government – namely the ratepayer - is left with carrying this large and unjust cost. Council thus urges DPHI to make Tilt Renewables and all other REZ developers more accountable for firstly ensuring real time traceability of its traffic and secondly ensuring its traffic does not use unauthorised access routes. Furthermore, that if their traffic is route noncompliant then the developer must pay the related costs of repair and maintenance. In light of this, Council requests the following be added into the scope of the Traffic Management Plan (Condition 31):

The Developer must include in the Project's Traffic Management Plan (TMP) the following details:

- a) Any specified operational constraints with respect to maximum numbers of vehicles (heavy/OSOM/light) per unit of time or total tonnages, etc;
- b) All heavy/OSOM vehicles must use telematics monitoring (e.g. GPS tracking or geofencing) to trace the movements of heavy/OSOM vehicles in real time. This data must be of an auditable standard, such that route compliance can be verified;
- c) Installation of surveillance cameras (CCTV) at critical intersections to monitor compliance of its traffic;
- d) Keep accurate logs of all vehicles entering and leaving the Project site. This data must be of an auditable standard;

Strengthening Protection of Local Roads from Unauthorised Use

- e) An independent, accredited compliance audit must review 50% of the heavy/OSOM/light vehicle fleet monthly to monitor route compliance performance. Such reports must be tabled with DPHI and the Council within 28 days of completion;
- f) All heavy vehicles must be clearly marked, for instance business name, to enable easier identification of non-compliant vehicles;
- g) Consequences for drivers who are non-compliant, for example ‘three strikes and you’re out’; and
- h) The Developer accepts liability for damage its vehicles cause to roads not authorised for access.’

The Applicant is committed to the development and implementation of a robust TMP to effectively manage traffic associated with the LRWF Project and to minimise potential impacts to other road users in accordance with the Development Consent. It is understood that the Development Consent includes a standard condition that requires the development and implementation of a TMP in consultation with relevant roads authorities including Warrumbungle Shire Council and for approval by the Planning Secretary.

The current condition of consent requires traffic management and monitoring to be addressed. The TMP will be prepared in consultation with both Warrumbungle Shire Council and DPHI where the level of detail can be reviewed and confirmed.

This current condition of consent is standard for State Significant Developments. No change is required.

Consent condition review and proposed road work design

Council has assessed and updated the road upgrade Conditions of Consent in the light of the proposed Mod-3 traffic changes (see Attachment 1). Also, Council does not agree with the applicant’s assessment of required road corridor and intersection upgrades (App G TIA Table 3) and has addressed same in Attachment 1.

The table of comments from the Warrumbungle Shire Council submission has been replicated below (refer to **Table 4.1**), with a response to each comment provided.

Table 4.1 Warrumbungle Shire Council Consent Condition Review and Comment

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response
Definitions (Applicant Requests #1, 2)	Applicant requested insert ‘Mod-3’, amend ‘Accommodation camp’, ‘Construction’ and ‘preconstruction accommodation camp’ definitions	Council objects Council does not support the combining and altering the terms as proposed by the applicant. Road upgrades are to be completed prior to construction of the main Accommodation Camp. See comment below for Appendix 6 Table 6-2 (Request #16 i).	The Applicant notes Warrumbungle Shire Council’s response. See below response related to Appendix 6 Table 6-2 request.
Appendix 6 Table 6-2 (#16(i)) of the Development Consent	(i) Update Table 6-2 to allow concurrent delivery of public road upgrades and wind farm works (including progressive Accommodation Camp delivery);	Council requires that all road upgrades are completed prior to main construction works, including the main Accommodation Camp, as per the approved conditions. The road upgrades are required for public and project traffic safety and to mitigate or offset the pavement impacts arising from heavy vehicle axle repetitions. If road upgrades are not completed before the main construction of each cluster (including the accommodation camp), then unacceptable safety incidents, complaints and failures of the roads will likely result. The Developer’s own analysis for Mod-3, which more closely approaches Council’s own estimates of ‘actual likely’ project traffic volumes than previous Modification reports, agrees that more than 300,000 inbound vehicles will be required during construction over 5 years (potentially 600,000 trips or one-way movements). This will potentially have severe impacts on road safety and road asset performance, if not mitigated by physical upgrades. The approved Mod-1 Amendment Report indicates the main accommodation camp for 600 workers will require delivery of more than 350 semi-trailer accommodation and office modules, plus	The Applicant acknowledges Warrumbungle Shire Council’s concerns and is committed to delivering a fit-for-purpose solution that effectively manages road safety and road asset performance whilst meeting critical project-specific requirements (e.g. ensuring project viability and maintain delivery program). Concurrent enabling works for both road upgrades and the first stage of the Accommodation Camp is critical for these project-specific requirements. Without updating the consent condition to allow for clearer concurrent road upgrades and the first stage of the Accommodation Camp, it is considered that the concerns raised by Warrumbungle Shire Council will remain. The 2024 Warrumbungle Shire Council submission in relation to the Mod-1 Application included a variety of proposed conditions that included provisions for use of the roads by heavy vehicles

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response										
		some 1,000 truckloads for gravel hardstand, concrete for footings, and other materials, plus an ongoing peak potable water demand of approx. 60 truck deliveries per week (120 kL/day). It should be noted that if, as per the applicant’s request, the main accommodation camp is removed from the definition of ‘Construction’ (Request ID #2 above), then the accommodation camp would not trigger road upgrades, which Council does not support.	prior to start or prior to completion of the upgrades if an appropriate TMP is in place. While both requirements are understood, they cannot both be met in practice: the road upgrades cannot be completed before construction of the Accommodation Camp while also housing the entire project workforce in the Accommodation Camp without requiring alternative accommodation. The Applicant is proposing these consent condition refinements to reflect the solution which addresses both concerns by Warrumbungle Shire Council.										
App 6 Table 6-2 (#16(iii))	(iii) delete references to Turee Vale Road (due to its removal as part of the Mod3 Application).	Conditionally agree Agree in principle, however Council upgrade requirements will need to apply to the Turee Vale Road crossing point between Clusters D – E to preserve road safety and Council’s road assets against unreasonable wear and tear. Amend the following Table 6-2 rows as shown below: <table><tr><th>Road / Intersection</th><th>Start – End</th><th>Length (km)</th><th>Upgrade</th><th>Timing</th></tr><tr><td>Turee Vale Road</td><td>At any Crossing (only) Points, and between</td><td>-/-</td><td>Upgrade and widen as necessary to sealed or</td><td>Prior to commencing the use of Turee Vale Road for any over-dimensional or</td></tr></table>	Road / Intersection	Start – End	Length (km)	Upgrade	Timing	Turee Vale Road	At any Crossing (only) Points, and between	-/-	Upgrade and widen as necessary to sealed or	Prior to commencing the use of Turee Vale Road for any over-dimensional or	The Applicant agrees with Warrumbungle Shire Council to include a row in Table 6-2 of the Development Consent which includes the Turee Vale Road crossing point.
Road / Intersection	Start – End	Length (km)	Upgrade	Timing									
Turee Vale Road	At any Crossing (only) Points, and between	-/-	Upgrade and widen as necessary to sealed or	Prior to commencing the use of Turee Vale Road for any over-dimensional or									

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment					Applicant Response
			any Site Access Points, on Turee Vale Road.		unsealed standard to the satisfaction of Council.	heavy vehicle traffic associated with the construction of the development.	
		Intersections					
		Vinegaroy Road / Turee Vale Road	(Row can be deleted)				
Cond 28A (#18)	Applicant requests deletion of the Transport Strategy condition in full.	Object Condition 28A (Transport Strategy) must not be deleted. The Transport Strategy and the separate Traffic Management Plan are both key documents with important and separate purposes, applicability, and audiences. The Transport Strategy to date has been a standard requirement of DPHI for all REZ major projects and Council concurs with its purpose. It is a high-level document that addresses the scope, design, physical installation and timing of the required road upgrades across the route. To conflate it with the Traffic Management Plan conditions elsewhere in the consent, which largely deals with management (administrative) measures, would risk losing numerous and major warranted design, road safety, and road asset upgrades required as a direct result of the likely project traffic.					The Applicant agrees to developing the Transport Strategy, if required. It is noted that Warrumbungle Shire Council have previously expressed concern over the number and length of documents requiring review for all REZ projects. The intent of removing this condition was to reduce the double-up and additional time of reviewing content which will already be reviewed and approved by Warrumbungle Shire Council in the s 138 applications as the Road Authority and through their consultation in developing the TMP. As noted in Section 4.9 , TfNSW have confirmed that the intersection upgrades that are being completed for the intersection of Golden Highway/Vinegaroy Road (BAL/CHR) will accommodate the changed traffic assumptions proposed as part of the Mod-3 Application.
Cond 29(a) (#20, 21)	(i) Remove the requirement to undertake a pre-works baseline dilapidation survey for	Object A baseline pre-works dilapidation survey is a critical data set used for the fair resolution of failures, defects, or performance issues. The data are key to identify when and					The Applicant accepts that the pre-works dilapidation survey can remain and will be undertaken on an as required basis for relevant segments of road. However, as noted above, the

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response
	roads; and (ii) include a requirement to undertake a baseline dilapidation survey after the public road upgrades/repairs are completed.	how changes to pavement conditions occur, even in the situation where future pavement overhauls are contemplated and still under design at the time traffic commences but then do not fully eventuate due to changes in the direction of the project. Pre-works dilapidation surveys are an industry-wide best practice standard requirement for development works that impact third-party assets of any kind, including public roads, and it is also a standard DPHI consent condition that applies to all other REZ major projects. Council's position is post upgrade works dilapidation reports are also important. No change to Condition 29(b) is warranted as it relates to 'make good' requirements.	Applicant would like to clarify that the pre-works dilapidation survey would become the baseline for the LRWF Project. After road upgrades are completed, the Applicant intends to utilise the contractual mechanism for recording Practical Completion of road upgrade packages and associated as-built surveys will then be used as a record for those upgraded sections rather than a separate dilapidation survey.
Cond 42(b) (#26)	Amend to allow (i) staged delivery of Accommodation Camp; (ii) use of alternate suitable accommodation (provided it does not impact accommodation services) consistent with the Accommodation and Employment Strategy; and (iii) correct the appendix reference to Appendix 2.	Object Council does not support the partial or staged 'ramping up' of the main Accommodation Camp, with the use of alternative off-site accommodation in the interim. The availability of hotel and motel accommodation is already very scarce and is needed to support tourism and general business activities. Council requests the current consent wording remain unchanged.	The Applicant acknowledges Warrumbungle Shire Council's concern for the availability of accommodation in the region and believe the AES (Condition 42E) will provide the necessary assessment and mitigation measures to address this. The Accommodation Camp was original proposed to 'ramp up' with the increase in workforce numbers and Warrumbungle Shire Council acknowledged this in their 2024 submission relating to the Mod-1 Application associated with the Accommodation Camp. As noted above, the road upgrades cannot be completed before construction of the Accommodation Camp while also housing the entire project workforce in the Accommodation Camp without requiring alternative accommodation. Initial consultation during the

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response
			drafting of the AES has identified local accommodation providers who support the use of their facilities by the LRWF Project workforce.
Cond 42(c) (#27)	Delete 42(c) conditions for the pre-construction accommodation camp	Object Council requests the current consent wording remain unchanged.	It is noted that the Pre-Construction Accommodation Camp would have been an initial stage of the main Accommodation Camp rather than an entirely separate aspect of the LRWF Project. The Pre-Construction Accommodation Camp, as described in the Development Consent, is no longer fit-for-project and was previously included due to concerns from TfNSW about the LRWF Project traffic using the Golden Highway and Vinegary Road intersection prior to upgrade works as part of the Port to REZ. Now that this intersection upgrade is nearly completed, the Applicant proposes the removal of Condition 42(C) and all associated references in the Development Consent to the Pre-Construction Accommodation Camp to allow for a progressive construction of the Accommodation Camp.
App 6 Table 6-2 (#34)	(i) Update Table 6-2 to ensure the scope/timing of required public road upgrades allow for concurrent wind farm works (see Condition 28 above);	Object (i) Not accepted. See discussion at Request #16(i) above. Council's position is that road upgrades must be completed prior to any 'construction' starting as per that defined term in the project approval, and the timing requirements 'prior to heavy vehicle traffic' already set out in Table 6-2.	The Applicant notes Warrumbungle Shire Council's response. See response above related to Appendix 6 Table 6-2. As noted above, the road upgrades cannot be completed before construction of the Accommodation Camp while also housing the entire project workforce in the Accommodation Camp without requiring alternative accommodation. Road upgrades/repairs are

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response
			anticipated to be completed progressively commensurate with the ramp-up of construction traffic with a key objective of maintaining the safety and efficiency of the road network.
	(ii) update Table 6-2 to remove the requirement to upgrade State Forest Road and Turee Vale Road, both of which are proposed to be removed as part of the Mod3 Application (excluding a very small section of Turee Vale Road where the Internal Transmission Line crosses); and	Conditionally agree (ii) Agree to the removal of references to State Forest Road. However, Turee Vale Road should remain in the table with a change to reflect crossing points, as proposed by Council at Request #16(iii) above.	The Applicant acknowledges Warrumbungle Shire Council's position.
App 6 Table 6-2 #35	Update the timing requirement for public road upgrades in Table 6-1 and Table 6-2 to apply to turbine / transformer OSOM movements and exclude other OSOM (e.g., accommodation camp and smaller OSOM components).	Object Not supported by Council because the Table 6-2 timing requires public road upgrades be completed prior to the main construction phase (defined term) and the commencement of use of 'any over-dimensional or heavy vehicles'. This includes traffic for the main Accommodation Camp construction.	The purpose of this request to amend the timing for public road upgrades is to facilitate concurrent and progressive construction of road upgrades/repairs, the Accommodation Camp, and the broader wind farm. In line with this approach, the LRWF Project requires flexibility to transport accommodation modules (which are defined as OSOM loads) whilst the public road upgrade/repairs are being completed. The accommodation module OSOM loads are much smaller in size and scale than turbine and transformer OSOM loads and can therefore be accommodated within a narrower road geometry particularly at corner/bend locations.

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response
			Separation of turbine and transformer OSOM movements from other OSOM movements is common practice due to the delay between needing to begin construction of the access tracks, foundations and hardstands to accommodate the turbine components and the actual delivery of the turbine components to site for installation. This also needs to consider the timing of the Port to REZ road upgrade works which must be completed prior to turbine OSOM movements to deliver these components to site. Any material delays to the completion of Port to REZ works must not cause flow-on delays to the construction of the rest of the LRWF Project which are not reliant upon the delivery of turbine or transformer-related OSOM components.
App 6 Table 6-2 Council Issue #1	Council-initiated Local road corridor upgrades	To be Conditioned Council does not agree with the applicant's assessment of required road corridor and intersection upgrades (App G TIA Table 3). See below for an explanation. Also, for avoidance of doubt, Council's assessment of required road upgrade standards based on the Austroads Guides to Road Design and the Guide to Traffic Management Part 6 is as stated below. Council seeks the Conditions of Consent to include the exact technical upgrade specifications as stated herein, not use generalised phraseology about upgrade standards. Note the location and length of each road segment and timing for upgrades are to remain as per the approved Appendix 6 Table 6-2, so are not repeated here.	The Applicant does not support inclusion of these prescriptive road width or pavement design life requirements within the Development Consent. These parameters are being appropriately resolved through detailed design, having regard to site-specific conditions, traffic loading, and applicable standards. The design development and Council reviews are the appropriate vehicle for this information. Discussions with Warrumbungle Shire Council on the road designs have been extensive and will continue until a resolution is reached, with consideration of context sensitive design and includes the following critical aspects: • Road safety.

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment		Applicant Response												
		<table><tr><th>Road Segment</th><th>Upgrade Required</th></tr><tr><td colspan="2">Road Authority: Warrumbungle Shire Council</td></tr><tr><td>Vinegaroy Road (Talbragar River Shire boundary to Coolah Creek Road)</td><td>8m sealed width plus 0.5m unsealed shoulders each side [Austroads AGRD03 500-1000 vpd sealed road]. Add to pavement design life 8 x 10^5 Equivalent Standard Axles (ESAs) to Austroads AGPT02.</td></tr><tr><td>Rotherwood Road</td><td>7.2m sealed width plus 0.5m unsealed shoulders each side [AGRD03 150-500 vpd sealed road]. Add to pavement design life 8 x 10^5 ESAs.</td></tr><tr><td>Pandora Road and Pandora Pass Road</td><td>7.2m sealed width [AGRD03 <150 vpd sealed road]. Add to pavement design life 3 x 10^5 ESAs.</td></tr><tr><td>Coolah Creek Road (Vinegaroy Road to transmission line crossing near Oakdale Road)</td><td>7.2m sealed width plus 0.5m unsealed shoulders each side [AGRD03 150-500 vpd sealed road]. Add to pavement design life 6 x 10^5 ESAs.</td></tr></table>	Road Segment	Upgrade Required	Road Authority: Warrumbungle Shire Council		Vinegaroy Road (Talbragar River Shire boundary to Coolah Creek Road)	8m sealed width plus 0.5m unsealed shoulders each side [Austroads AGRD03 500-1000 vpd sealed road]. Add to pavement design life 8 x 10^5 Equivalent Standard Axles (ESAs) to Austroads AGPT02.	Rotherwood Road	7.2m sealed width plus 0.5m unsealed shoulders each side [AGRD03 150-500 vpd sealed road]. Add to pavement design life 8 x 10^5 ESAs.	Pandora Road and Pandora Pass Road	7.2m sealed width [AGRD03 <150 vpd sealed road]. Add to pavement design life 3 x 10^5 ESAs.	Coolah Creek Road (Vinegaroy Road to transmission line crossing near Oakdale Road)	7.2m sealed width plus 0.5m unsealed shoulders each side [AGRD03 150-500 vpd sealed road]. Add to pavement design life 6 x 10^5 ESAs.		• Applicable road guidelines. • Avoiding/minimising vegetation loss (some segments of the roads are currently lined with trees of varying habitat and amenity value). • Avoiding/minimising heritage impacts (including potential modified trees and PADs). • Avoiding/minimising impacts to public and private land adjacent to the existing road reserve.
Road Segment	Upgrade Required															
Road Authority: Warrumbungle Shire Council																
Vinegaroy Road (Talbragar River Shire boundary to Coolah Creek Road)	8m sealed width plus 0.5m unsealed shoulders each side [Austroads AGRD03 500-1000 vpd sealed road]. Add to pavement design life 8 x 10^5 Equivalent Standard Axles (ESAs) to Austroads AGPT02.															
Rotherwood Road	7.2m sealed width plus 0.5m unsealed shoulders each side [AGRD03 150-500 vpd sealed road]. Add to pavement design life 8 x 10^5 ESAs.															
Pandora Road and Pandora Pass Road	7.2m sealed width [AGRD03 <150 vpd sealed road]. Add to pavement design life 3 x 10^5 ESAs.															
Coolah Creek Road (Vinegaroy Road to transmission line crossing near Oakdale Road)	7.2m sealed width plus 0.5m unsealed shoulders each side [AGRD03 150-500 vpd sealed road]. Add to pavement design life 6 x 10^5 ESAs.															

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment		Applicant Response
		Coolah Creek Road (from transmission line crossing to Pandora Road)	7.2m sealed width [AGRD03 <150 vpd sealed road]. Add to pavement design life 3 x 10^5 ESAs.	
		Oakdale Road	6m unsealed width [NTRO Unsealed Roads Best Practice Guide Category 4C Road 10-50 vpd]. Add to pavement design life 3 x 10^5 ESAs	
		Turee Vale Road	Crossing points as per response to Request 16(iii) above. Add to pavement design life 3 x 10^5 ESAs at the crossing point.	
		Bounty Creek Road	6m unsealed width [NTRO Unsealed Roads Best Practice Guide Category 4C Road 10-50 vpd]. Add to pavement design life 2 x 10^5 ESAs	
		Gundare Road	4m unsealed width as per the Works Deed between TILT and WSC dated 6 th September 2022. Add to pavement design life 2 x 10^5 ESAs	
		Vinegaroy Road / Rotherwood Road	Full Channelised Right (CHR) and Auxiliary Left (AUL) turn treatments	
		Vinegaroy Road / Temporary Workforce Accommodation and Construction Compound Access	Full CHR and AUL	
		Vinegaroy Road / Coolah Creek Road	Full CHR and Basic Left (BAL)	
		Rotherwood Road / Norfolk Road	Realign intersection so Norfolk Road is at 90 degrees to Rotherwood Road	
		Coolah Creek Road / Cooks Drive	Nil, as project traffic is prohibited on Cooks Drive.	
		Coolah Creek Road / Oakdale Road	BAL and Basic Right (BAR)	

Condition Number (Request Id – Appendix M of the Modification Report)	Applicant Request	Council Position and Comment	Applicant Response
Council Issue #2	Route restrictions for deleted State Forest Road and Turee Vale Road construction routes	To be Conditioned The Appendix G TIA Section 4.2.1 states ‘due to the removal of State Forest Road as a proposed construction traffic route, approximately one-third of vehicle movements from State Forest Road will be shifted to other public roads in the project’s construction traffic network.’ It is unclear if the intent is two-thirds of Project traffic (e.g., light vehicles) will remain permitted to use State Forest Road(?). The Table 10 traffic volume estimates do not list State Forest Road. Council requests the Department impose a consent condition that explicitly states that all project traffic (light, heavy and OSOM vehicles) shall only use the approved routes, expressly identifying Turee Vale Road and State Forest Road as being unauthorised routes for Project-related traffic of any type.	Due to the removal of the four turbines that were previously accessed from State Forest Road, there is no longer a need for any construction vehicles to use State Forest Road. One-third of the previously estimated traffic on State Forest Road is still accounted for as one-third of the turbines previously accessed off State Forest Road remain accessed via internal access roads in D-Cluster. The remaining two-thirds of the traffic previously estimated on State Forest Road is no longer required for the LRWF Project. The Applicant understands Warrumbungle Shire Council’s concern for use of other roads by heavy and OSOM vehicles and note that Condition 26 should be updated to exclude State Forest Road and Turee Vale Road (excluding the crossing point).

4.12 Upper Hunter Shire Council

General Comment

Council has reviewed the documentation provided in relation to this modification and has no objection to the proposal as presented.

The comment from Upper Hunter Shire Council is noted.

4.13 Midwestern Regional Council

General Comment

Council has reviewed the submitted documentation and, having regard to the nature and extent of the proposed modifications, advises that it has no additional comments to provide at this time.

The comment from Mid-Western Regional Council is noted.

4.14 Muswellbrook Shire Council

OSOM Route

The only part of the Project that applies to Muswellbrook Shire Council are key roads described in Figure 6.1, referred to as OSOM Route – EnergyCo Port to REZ (Option1). This route is also referred to as Option 1a.

Wind Turbine Generator components will be transported from the Port of Newcastle to the Project site via the State Road network including the New England Highway, Hunter Expressway and Golden Highway. An alternate route (Option 1a) is required as the Denman Bridge on the Golden Highway cannot accommodate OSOM loads taller than 5.6 metres in height.

Staff note this route and have no further comments.

The comment from Muswellbrook Shire Council is noted.

OSOM Route

OSOM Route – Energy Co Port to REZ (Option 1 – referred to as Option 1 a).

OSOM loads exceeding 5.6 m in height, will use the route of Option 1a by turning right from the Golden Highway onto Denman Road, then left onto Bengalla Road, travelling through to Wybong Road and continuing along Wybong Road before turning right onto the Golden Highway at Sandy Hollow.

Council has previously objected to this route in submissions dated 13 October 2022 and 26 June 2024 due to the predicted impacts on local roads and bridges that are not fit for purpose, and the resulting social and economic impacts on the Muswellbrook community.

The Minister for Regional Transport and Roads announced the reclassification of Bengalla Link Road and Wybong Road (west) in a media release dated 18 July 2024.

It is proposed that the reclassification to a State Road will be gazetted after road improvement works (“Betterment Works – Wybong Road”), covered by Regional Roads Transport Recovery funding, are complete, in the second quarter of 2026, weather permitting.

These road improvements works are underway, and Wybong Road is currently closed to heavy vehicles at Pheeney’s Creek. Some traffic is being diverted along Reedy Creek Road, however this road is not suitable for OSOM loads.

OSOM Route
Once the roads that are part of Option 1a are reclassified to State Roads, Council will have no objection to their use for OSOM movements associated with the Liverpool Range Wind Farm project.

The comment from Muswellbrook Council is noted. OSOM movements along this route are anticipated to commence during third quarter 2027.

5.0 Response to Community Submissions

As outlined in **Section 2.0**, a total of eight community submissions were received during the exhibition period.

A response to the key issues raised in these submissions is included in the following sections, grouped by theme as per the categorisation provided in **Section 2.2** as recommended by the *State Significant Development Guidelines: Preparing a Submissions Report* (DPHI, 2026).

Several of the community submissions received were similar or had consistent themes. Where this is the case, the theme of the concern has been provided in bold in the text boxes below with some examples of specific quotes from the submissions provided in the text box in *italics* to assist the reader. A Submissions Register is provided in **Appendix 1** to provide a cross reference to each submission received.

5.1 Economic, Environmental and Social Impacts

5.1.1 Landscape and Visual

Visual Impact – Transmission Lines

Pity about those who did not choose this destruction and have to wear the visual impacts of transmission infrastructure just to get the transmission line out to those same land hosts who prefer not to look at them - SE-118606739

The Mod-3 layout includes only minor refinements to the Internal Transmission Line (reduction in length of 1.6 km) this refinement is associated with the revised connection strategy and updated substation location. This change does not significantly reduce the visibility of the transmission line and was not the purpose of the refinement.

The removal of the Approved External Transmission Line from the Mod-3 Layout does remove the associated visual impact for both host and non-associated residences south of Durridgere SCA. It is noted that the LRWF Project will now connect into the CWO REZ Transmission Line which generally adopts the Approved External Transmission Line north of Durridgere SCA to the connection substation within the wind farm off Rotherwood Road, Cassilis. Potential visual impacts associated with CWO REZ Transmission Line were assessed separately under the development application that was prepared for the CWO REZ Transmission Line by EnergyCo.

Visual Assessment Requirements

The photomontages presented in this modification should be re submitted without the 'fish eye' lense which deliberately makes the turbines look smaller. These turbines will be unnatural monsters on our landscape and highly visible from our town. Tilt need to make public the photomontages without distortion - SE-118611491

No distortions have been applied to the photomontages. The photomontages have been prepared showing turbines in their georeferenced location and modelled to the maximum permissible height of 215 m above ground level (AGL), hub height of 129 m (AGL), and with a rotor diameter of 172 m. The photomontages have been prepared in accordance with the requirements of the *Wind Energy*

Guideline – Technical Supplement for Landscape Character and Visual Impact Assessment (DPHI, 2024).

5.1.2 Hazard

5.1.2.1 Bushfire Risk and Management

Aerial Firefighting

Nothing in this modification regarding the impact to aerial firefighting, guessing that means this will go the same way as the Namoi Blackjack radar, part of our past and not in our future. No pilot will consider it safe to fly around the 173 turbines, 112 transmission towers, 7 Microwave towers and 10 wind monitoring towers in a smoke-filled sky - SE-118606739

What does TILT propose for firefighting given that no aerial firefighting will take place in the entire project area? No mention by the aviation "experts" on aerial firefighting despite a whole appendix on aerial impacts - SE-118611491

It is concerning that aerial firefighting is completely omitted from mention in this modification. Presumably this is because Aviation Projects don't see any possibility of aerial firefighting aircraft ever entering the project area - SE-118625239

We are appalled that the project will also include, on top of the 173 turbines - 112 transmission towers, 7 Microwave towers and 10 wind monitoring towers erected on the ridges. The number of turbines PLUS associated towers obviously make it impossible for large tanker aerial firefighting support. We reject AFAC's policy that aerial firefighting can occur within the industrial site if turbines are parked in the bunny ears position and have had advice from a pilot involved in the "study case" agree that large tankers will be excluded from industrial wind sites, and the principal of Aviation Projects, Keith Tonkin verbally admitted on 27 February 2026, at Dubbo Court House, that large tanker aerial firefighters would not be able to operate within turbine areas. What does TILT propose to do so that the district doesn't burn? - SE-118644989

The Applicant is committed to ensuring appropriate bushfire mitigation measures are in place, and proposes to manage bushfire risk through prevention and land management practices. The consolidated management and mitigation measures (**Appendix 2**) include the commitment to the development of a Bushfire Management Plan as part of the Emergency Plan (Schedule 3, Condition 37B of the Development Consent). The plan would provide for appropriate bushfire management preparedness on site including continual land management practices to appropriately manage fuel loads, installation and management of firefighting equipment, establishment of compliant Asset Protection Zones (APZs) around infrastructure, all-weather access, fire safe design and management of substations (including bunding and inspections). The plan will also include appropriate emergency response procedures, bushfire response training requirements and monitoring/communication protocols.

Potential impacts and proposed management and mitigation in relation to aerial firefighting is addressed in the original Aviation Impact Assessment (AIA) (Aviation Projects, 2023). The Aviation Impact Assessment (AIA) undertaken for the Mod-3 Application (Aviation Projects, 2026) confirmed that aviation safety outcomes associated with the Mod-3 Layout are consistent with the Approved Development, and the findings that supported the Approved Development remain valid.

Aerial firefighting operations (firebombing in particular) are conducted under Day VFR, sometimes below 500 ft AGL. Under certain conditions visibility may be reduced/limited by smoke/haze. Most aerial firefighting organisations have formal risk management programs to assess the risks associated with their operations and implement applicable treatments to ensure an acceptable level of safety

can be maintained. For example, pilots require specific training and approvals, additional equipment is installed in the aircraft, and special procedures are developed.

The Australasian Fire and Emergency Services Council (AFAC) has developed a national position on wind farms, their development and operations in relation to bushfire prevention, preparedness, response and recovery, set out in the document titled Wind Farms and Bushfire Operations (2018). The following is included in relation to aerial firefighting:

- Wind farm operators should be responsible for ensuring that the relevant emergency protocols and plans are properly executed in an emergency event. During an emergency, operators need to react quickly to ensure they can assist and intervene in accordance with their planned procedures. The developer or operator should ensure that:
 - Liaison with the relevant fire and land management agencies is ongoing and effective access is available to the wind farm site by emergency services response for on-ground firefighting operations.
 - Wind turbines are shut down immediately during emergency operations – where possible, blades should be stopped in the ‘Y’ or ‘rabbit ear’ position, as this positioning allows for the maximum airspace for aircraft to manoeuvre underneath the blades and removes one of the blades as a potential obstacle. Aerial personnel should assess risks posed by aerial obstacles, wake turbulence and moving blades in accordance with routine procedures.

Both CASA and the RFS have been consulted in relation to the LRWF Project and neither have highlighted any concern regarding an inability for aerial fire-fighting operations to occur. Appropriate management and mitigation are proposed to address bushfire risk associated with the LRWF Project and operation of the proposed turbines can be managed in accordance with appropriate AFAC requirements.

5.1.2.2 Aviation

Impact to Aircraft Landing Areas
<i>Do all the owners of the ALA's listed in this aerial appendix know anything about the impact of the TILT turbines to their ALA? If Tilt knows of the existence of the ALA they know who owns the ALA - SE-118611491</i> <i>Aviation projects list the ALA's that will be impacted by the 173 turbines. Are the owners of these ALA's aware of this? Or will they only learn the impacts when the project is complete. If Aviation Projects knows of the existence of the ALA then they know who to contact regarding impacts. Just burying this information in Mod 3 Appendix K is unacceptable - SE-118625239</i>

As outlined in the AIA, the assessment focused on the potential changes in impact associated with the Mod-3 Layout relative to the Approved Development. Given the potential impacts are consistent with the Approved Development, additional consultation was not required. The Applicant is in contact with the owners of all relevant ALAs and appropriate consultation in relation to potential management requirements is ongoing.

5.1.2.3 EMF and Health

Health Impacts – Transmission Lines

Pity about those who did not choose this destruction and have to wear the health impacts of transmission infrastructure just to get the transmission line out to those same land hosts who prefer not to look at them - SE-118606739

Design and operation of transmission lines do require consideration of potential health impacts associated with Electromagnetic fields (EMF). EMF occurs whenever electricity is produced, transmitted or used, and so are found commonly in everyday life. Transmission lines do inherently produce varying levels of EMF emissions.

The EMF from transmission lines varies with configuration, phasing and load, however typical EMFs near high voltage overhead transmission lines are estimated by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) to be between 1 μ T and 20 μ T (directly underneath) and 0.2 μ T and 5 μ T (at the edge of easement). A microteslas (μ T) is the unit of measurement for the magnetic field which passes through a given area. This level is less than the natural magnetic field of the earth which varies from approximately 30 μ T to 70 μ T (Finlay, 2010). Underground cabling networks typically have no EMFs as these are screened by ground cover.

The Mod-3 Layout has been designed to ensure adequate separation distances between EMF sources and sensitive receivers, road users, and the public. Electrical equipment will be designed, selected, and procured in accordance with relevant international and Australian EMF standards.

5.1.2.4 Telecommunications

Impact to the Namoi Radar

Of concern is the stated impact to the Namoi Blackjack radar. No resolution by TILT, will we see one? - SE-118606739

We note that the impact to the Namoi BlackJack radar is unresolved. This radar is used constantly by our community to monitor impending weather. Is the community aware that this will no longer be a useful tool? What plan does TILT have to resolve this issue - SE-118625239

The assessment of the Mod-3 Layout has not determined that the Namoi Radar will no longer be a useful tool, only that the Bureau of Meteorology (BoM) has previously indicated as part of the Mod-1 Application there may be risk of impact to the Namoi radar associated with the LRWF Project. This is consistent with the potential risk associated with the Approved Development and the Applicant will consult with the BoM to discuss potential mitigation and management strategies where required.

5.1.3 Traffic and Transport

Road Upgrades

Whose responsibility is what part of the road upgrades, at whose cost? The information from Tilt, from Council and through the VPA is ambiguous and there is no clear explanation as to who is responsible for what, and when and for how long - SE-118651489

The Applicant is responsible for the upgrade/repair of the public roads it uses to construct the LRWF Project and the associated costs. The responsibility and timing/triggers of the road upgrade/repair works is outlined in the Development Consent (Condition 28 and Appendix 6). In addition, Appendix 3 of the Development Consent sets out the requirements of the Voluntary Planning Agreements (VPA)

including the required monetary contributions that the Applicant must pay to Warrumbungle and Upper Hunter Shire Councils which includes a component that is to be allocated to ongoing road maintenance throughout the operational life of the LRWF Project.

5.1.4 Decommissioning

Decommissioning Costs and Responsibility

Still nothing about the decommissioning, the only certainty is that the land hosts will be expected to fund it - SE-118606739

The LRWF Project covers the construction, operation and decommissioning of the Project. The Development Consent (Conditions 40 and 41) outline the requirements in relation to decommissioning and rehabilitation of the LRWF Project. The Mod-3 Application does not change the approach to decommissioning of the LRWF Project which remains consistent with the Approved Development. The Applicant also has a contractual obligation with the host landowners to appropriately rehabilitate the land as part of the decommissioning process.

The Applicant is a leading Australian renewable energy and long-term asset owner committed to the development and operation of the LRWF Project and associated investment in the land and surrounding local community.

5.1.5 Social Impacts

Social Impacts

The community should not have their homes and lives wrecked by this monstrous development - SE-118656493

The Applicant recognises the potential social impacts of the LRWF Project and acknowledges that some community members object to the proposed wind farm development. Specifically in relation to the Mod-3 Application and comparison of the potential impacts relative to the Approved Development, the potential environmental and amenity impacts will remain as previously assessed or in some cases decrease.

The Applicant is committed to the implementation of appropriate management and mitigation measures to appropriately address the residual environmental and social impacts. This includes:

- a full suite of environmental management plans (including noise, visual, traffic and biodiversity impact mitigation and management)
- specific social impact management strategies, including:
 - Stakeholder and Community Engagement Plan (SCEP)
 - Accommodation and Employment Strategy (AES)
 - Community Benefit Sharing Plan
 - Complaints Management Plan and register.

5.1.6 Economic Impacts

Economic Impact – Transmission Lines

Pity about those who did not choose this destruction and have to wear the business impacts of transmission infrastructure just to get the transmission line out to those same land hosts who prefer not to look at them - SE-118606739

As discussed in **Section 5.1.1**, the Mod-3 Layout includes only minor refinements to the Internal Transmission Line (reduction in length of 1.6 km). This refinement is associated with the revised connection strategy and updated substation location and has no material effect on potential economic impacts of the LRWF Project.

The LRWF Project will connect into the CWO REZ Transmission Line proposed by EnergyCo. The associated impacts have been separately assessed as part of the development application that was prepared for the CWO REZ Transmission Project which was approved in 2024.

5.1.7 Cumulative Impacts

Cumulative Impacts

Cumulative impacts? no more aerial firefighting, no more Namoi Blackjack radar, destruction of native vegetation, endless diesel for bulldozers and trucks, endless water for making concrete and dust suppression and no affordable reliable electricity - SE-118606739

The cumulative impact on this community will be irreversible - SE-118611491

The cumulative impacts of this project remain unaddressed and unresolved - SE-118625239

This project is still far too big, and combined with another nearby gigantic wind development, the Coolah district will be completely transformed into a sprawling industrial zone. The natural and rural amenity will be overwhelmed by hundreds of giant alien-like turbines - SE-118656493

As outlined in Section 6.7 of the Modification Report, the potential cumulative impacts of the LRWF Project were reviewed in relation to the changes to the Mod-3 Layout and also the change to the estimated timing of construction and operational phases of the LRWF Project (relative to the Approved Development).

The Mod-3 Application presents refinements to the LRWF Project that either maintain or reduce the associated impacts (in relation to both the construction and operational phases). Given the predicted impact associated with the LRWF Project has not increased and the Applicant is committed to the continued implementation of the proposed management and mitigation measures, the associated cumulative impact will also be addressed. Cumulative impact will be further considered during the preparation of the proposed management plans, in consultation with local Councils and DPHI.

5.2 Justification and Evaluation

Intergenerational Equity and the Public Interest

Yet Tilt manage to weave into the modification the latest catch phrase "intergenerational equity", I wonder how that looks when thousands of trees have been bulldozed in the name of the open cut mine for quarrying material, new roads, widening of roads, transmission towers, substations, cement batching plants and the turbines plus associated towers - SE-118606739

There are numerous mentions in the modification project of "intergenerational equity". We cannot see how the proponent can legitimately believe that building 173 turbines with the associated roads,

Intergenerational Equity and the Public Interest

transmission towers, substations, open cut mine for the extraction of 700,000 tonnes of rock material for project roads and cement, is somehow going to "ensure the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations". Please explain - SE-118644989

The LRWF Assessment was published by the Department in Mid-March 2018. The relevant parts of the EP&A Act in force at that time state:

"4.15 Evaluation (cf previous s 79C) (1) Matters for consideration—general In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application: (a) (i) to (v) (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality, (c) the suitability of the site for the development, (d) any submissions made in accordance with this Act or the regulations, (e) the public interest.

" From the LRWF Assessment dated March 2018, Page 16, the Department wrote: "Section 4.15 Considerations, Section 4.15(1) of the EP&A Act outlines the matters that a consent authority must take into consideration when determining development applications.

These matters can be summarised as:

the provisions of environmental planning instruments (including draft instruments), development control plans, planning agreements, and the EP&A Regulations; the environmental, social and economic impacts of the development; the suitability of the site; any submissions; and the public interest, including the objects in the EP&A Act and the encouragement of ecologically sustainable development (ESD).

" Why did the Department summarise "the public interest" into "the public interest, including the objects in the EP&A Act and the encouragement of ecologically sustainable development (ESD)"?

Easy, Neither the Applicant nor the Department can convince many of us that wind farms are in the public interest. It has given them the opportunity to bury the real issue under the waffle of the Act objects or even more so the drivel of ESD, as both of them do in the LRWF EIS and Assessment respectively. The LRWFM3 Modification Report has a "Statutory Compliance Summary" (Appendix D) It starts off with reference to a number of SEPPs, followed by some Guidance and an Act. Most people would consider the EP&A Act the most important statutory document. So it finally appears with nearly 2 pages of waffle and drivel as mentioned above. We lastly find reference to Section 4.15, where on the last line of the document we find "the public interest" for which we are advised: "Refer to Section 5.0, Section 6.0 and Section 7.0." In those sections, there is no reference to the public interest, so I guess you have to make your own list: a bit of money here and there, some gross job numbers.... So, there are some minor wind farm benefits that are in the public interest, but many more that aren't.

The justification for the Approved Development including the assessment against the principles of ecologically sustainable development (ESD) was established as part of the original assessment and subsequent approval. Intergenerational equity forms part of the consideration of ESD and refers to equality between generations. It requires that the needs and requirements of today's generations do not compromise the needs and requirements of future generations in terms of health, biodiversity and productivity. The NSW and Commonwealth Governments' have made a commitment to transition to renewable electricity generation. This commitment is proposed to facilitate the shift away from coal-fired power generation and assist in achieving the associated future greenhouse gas reduction targets and provide a replacement source of electricity that is sustainable and reliable for future generations.

The overall outcome of the assessment for the Approved Development confirms that the impacts associated with the LRWF Project have been avoided as far as practical through the design of the layout and the overall project approach. Residual impacts where avoidance is not possible are addressed through the implementation of best practice management and mitigation. This assessment

was then supported by the DPHI assessment report which determined the LRWF Project was approvable and in the public interest.

The Mod-3 Application was reviewed against all the principles of ESD to establish whether the Mod-3 Application changed the overall justification of the LRWF Project which is outlined in Section 7 of the Modification Report.

On balance, the assessment of the Mod-3 Layout indicates there are no new or increased environmental impacts when compared to the Approved Development. The Mod-3 Application is required to rationalise and optimise the design of the Approved Development following value engineering investigations and constructability reviews, further landowner consultation, and commitment to connect the LRWF Project into the CWO REZ Transmission Line.

A key consideration of the design refinements associated with the Mod-3 Layout is to reduce the extent of overall ground disturbance and native vegetation removal required for both the wind farm and required public road upgrades. In this regard, the Mod-3 Application improves the alignment with intergenerational equity.

5.3 The Mod-3 Application

Mod-3 Layout

It is noted that some of the land hosts have rearranged the transmission lines so they don't see this infrastructure from their homes - SE-118606739

There are still 173 too many turbines - SE-118611491

Protecting two land hosts homes from visual impact of transmission lines is a joke, what about the countless people impacted who did not choose this. Anyone who chooses to take part should have to wear the full impacts, not cherry pick the ones they will suffer - SE-118611491

I continue to object to the Liverpool Range Wind project for all the reasons I have outlined in my previous submissions. Removing twelve turbines, overhead power lines and access points will not adequately address the issues with the broader project - SE-118649239

A key consideration of the design refinements incorporated into the Mod-3 Layout is to achieve an overall reduction in disturbance and impact associated with the LRWF Project. The design refinements incorporate detailed pre-construction planning which was informed through consultation with host landholders. The requested design refinements from the host landholders predominately related to improvements to assist with compatibility of the LRWF Project with agricultural land use and also incorporates design requests to reduce potential impacts to amenity. In making these refinements the potential impacts to the amenity of non-associated residences have also been assessed and is either consistent with or reduced relative to the Approved Development.

The Mod-3 layout includes only minor refinements to the Internal Transmission Line (reduction in length of 1.6 km) with this refinement associated with the revised connection strategy and updated substation location. This change does not significantly reduce the visibility of the transmission line and was not the purpose of the refinement.

Overall, the assessment of the Mod-3 Layout indicates there are no new or increased environmental impacts when compared to the Approved Development.

5.4 Procedural Matters

Engagement

I object to the 3rd modification of the LPRWF project. I object to the project in its entirety. I object to the continual excessive demand on the communities of Coolah and Cassilis to keep up with project information and modifications and the endless voluntary requirement to keep up with the multiple developments and attempt to stay informed. Many community members cannot possibly take this time and simply do not understand the scale and details of this project. This project, the quarry, the CWO REZ transmission, the VOW Wind Project - the extent of information and the scale of ALL developments is TOO MUCH for the small communities of Cassilis and Coolah. This project has been in planning for too long, the majority of the community is disengaged, others are divided and other purely interested to see community benefit money spent. The transport routes, road access, road reconstruction and changes - these changes are not well understood by the community. Nor are the changes to ridgelines, the environment and landscapes - SE-118651489

I object to the ongoing burden on communities to voluntarily stay informed (spanning not just years, but decades). I object to the continual modification of this project. I object to the lack of transparency around road changes, upgrades, timelines, costs and responsibilities. How many exhibitions for one project is too much? Not to mention the quarry, which is a separate project in the assessment process, yet this project is dependent on it? How many projects in one area is too much? - SE-118651489

The appropriate consultation requirements have been applied to the Mod-3 Application. It is acknowledged that this process has contributed to some members of the community experiencing consultation fatigue. Additionally, the frustration the community are feeling in relation to the timeframe associated with project planning is acknowledged. The Mod-3 Application will allow the Applicant to move the LRWF Project forward into the construction phase.

As outlined in Section 5.0 of the Modification Report, the Applicant has established communication methods and channels with the local communities and interested stakeholders, which includes the following:

- Project website
- Local shopfront in Coolah (open Tuesday to Thursday)
- Community Consultative Committee (CCC)
- Dedicated Project mailing list
- Project phone number and email address for enquiries.

Specific consultation was undertaken with the community as part of the Mod-3 Application utilising these methods as well as targeted newsletters and information sessions:

25 November 2025 – Coolah Youth & Community Centre

27 November 2025 – Cassilis Community Centre

Material was developed to inform the information sessions outlining both detailed assessment results (both environmental and social) and the proposed changes to the LRWF Project associated with the Mod-3 Application. The content developed for the information sessions was also made available online and displayed in the LRWF Project shopfront for the community members that could not attend.

Validity of the Development Consent

I believe the original approval has lapsed. I've documented a number of similar instances to the Department over the years. In summary: The approval was signed on March 27, 2018. Both the version of the EP&A Act 1979 (the Act) in force then and the current version, state:

"A development consent lapses 5 years after the date from which it operates."

The approval lapse date was extended for another 2 years due to covid. The lapse date was therefore March 27, 2025; over a year ago. UNLESS, as per the Act (current version):

"Development consent does not lapse for the following if building, engineering or construction work relating to the building, subdivision or work is physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under this section (a) the erection of a building, (b) the subdivision of land, (c) the carrying out of a work."

OR, the version of the Act in force on the approval date:

"Development consent for: (a) the erection of a building, or (b) the subdivision of land, or (c) the carrying out of a work, does not lapse if building, engineering or construction work relating to the building, subdivision or work is physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under this section."

No reasonable person would conclude, from the many sources available, that qualifying work had taken place, ie. that genuine construction of the LRWF had commenced. This Modification Application & its Report confirm over and over that construction work has not commenced and is unlikely to for some years. The Modification Application is testament to the fact that the LRWF is still being designed and becoming more constructible. Please read the four pages of the Report Executive Summary. If that is not convincing enough, I suggest more research into:

the Tilt website

CCC minutes

LRWF Newsletters eg Newsletter June 2025 "Project field studies underway

You may have recently seen our contractors undertaking site investigations, property boundary surveys, and geotechnical investigations on Bounty Creek, Coolah Creek, Rotherwood, Vinegaroy and Yarrowonga Roads. These investigations are ongoing. The findings from this work will be used to inform the detailed design for public road upgrades, which are required before construction starts on the wind farm."

The creative legal minds within the Department will once again come up with a reason to dispute the above (assuming the Developer doesn't address the issue). I look forward to it. I hope the justification is not a SHAM, a descriptor used by Justice Kunc in the Supreme Court of NSW in 2016, on a matter solely concerned with the lapsing of a project when he wrote: " 58. It was submitted that, jointly and severally, the Relevant Works related to the subject matter of the Consent. The Relevant Works had been "physically commenced" because, applying Hunter Developments at [86] (see paragraph [82] below), they involved physical activity on the land to which the Consent applied that involved an appearance of reality and were not merely a sham." - SE-118551241

The Development Consent (SSD 6696, as modified) authorises the LRWF Project, subject to conditions. The Development Consent relevantly defines the "construction" to mean all physical works to enable the operation, including but not limited to the construction of wind turbines and ancillary infrastructure carried out before the commencement of operation, excluding pre-construction minor works, preconstruction accommodation camp, road upgrades, and maintenance.

The construction phase of the LRWF Project (as defined by SSD 6696, as modified) has not commenced but associated "pre-construction minor works" authorised by the Development Consent physically commenced in November 2024. The Development Consent defines "pre-construction minor works" as including:

- i) *the following activities:*

building/road dilapidation surveys;

geotechnical investigative drilling,

artefact survey and/or salvage;

establishing temporary site office (in locations meeting the criteria identified in the conditions of this approval)

installation of environmental impact mitigation measures, fencing, enabling works;

ii) *construction of minor access roads and minor adjustments to services/utilities, etc. for the activities identified in i) above*

iii) *minor clearing or translocation of native vegetation for the activities identified in i) and ii) above.*

The following pre-construction minor works were commenced on site since November 2024:

- Construction of the temporary site office located within the Approved Development Corridor (near the proposed workers accommodation camp).
- Geotechnical investigations, including drilling, associated with proposed public road works and project infrastructure.
- Cadastral boundary surveys.

These pre-construction minor works formed a necessary step in the process of constructing the further buildings and works authorised by the Development Consent.

In accordance with section 4.53 of the EP&A Act and clause 40 of the *Environmental Planning & Assessment Regulation 2021*, the Development Consent would have lapsed 27 March 2025 unless “*building, engineering or construction work relating to the building, subdivision or work is physically commenced on the land to which the consent applies*” prior to that date. The leading case on these provisions as they relevantly apply to the Development Consent is that of the NSW Court of Appeal in *Hunter Development Brokerage Pty Ltd v Cessnock City Council* [2005] NSWCA 169. In that case the Court confirmed that “*the carrying out of survey work to establish the correct location*” of approved project elements prior to the lapsing date “*is capable of constituting a first step in the performance of the engineering and/or construction work*” and so, providing that the works “*truly relate ... in a real sense to that which has been approved*” and are “*a necessary step in, or part of, the process required for, or involved in ... the carrying out of the work ... authorised by the consent*” they constituted physical commencement and operated to preserve the development consent from lapsing under the EP&A Act

In line with the relevant provisions of the EP&A Act and this case authority, the physical commencement of the pre-construction minor works as outlined above on site since November 2024, prior to the lapsing date, operated to preserve the Development Consent from lapsing.

5.5 Issues Beyond the Scope of the Mod-3 Application

Site Suitability

Put this project in the already destroyed environment in our major cities - SE-118611491

The LRWF Project is located within the CWO REZ, an area defined by the NSW Government for renewable energy development and has connection rights to the CWO REZ Transmission Line which supports the suitability of the site for the LRWF Project. The suitability of the site was confirmed through the assessment associated with the approved Development Consent; the Mod-3 Application does not influence the suitability of the site for the LRWF Project.

Engagement undertaken by DPHI

Given the communities are disengaged in the planning and design process, how is the Department ensuring that adequate engagement is reached (not just opportunity provided), but actually reached and accomplished and agency is given for local involvement and decision making? Can this be evidenced? - SE-118651489

As discussed in **Section 5.4**, the Applicant has established communication methods and channels with the community and specific consultation in relation to the Mod-3 Application was undertaken. DPHI manages the statutory public exhibition process and provides the Applicant with the submissions received. The Applicant is responsible to provide an appropriate response to all relevant matters raised in submissions, with those responses set out in this Submissions Report for DPHI's review and determination of the Mod-3 Application.

Renewable energy targets and related legislation

As each month goes by, the broader international issues will also negatively affect the public interest both nationally and locally.

- *COP21 in 2015 produced the Paris Climate Agreement. It is going nowhere. The United States has pulled out, and China, India, Russia and others, as developing nations, were never Committed.*
- *COP30 was a disaster.*
- *COP31 will be worse, especially as it is being partly organized, negotiated and led by our very own Chris Bowen.*
- *Net Zero (by whatever date) will not succeed - anywhere.*
- *Renewable Energy will go onto the back burner worldwide while the focus returns to traditional energy sources.*
- *Australia may well become the renewable energy superpower as no other country is interested (partly sarcasm)*
- *Increased levels of Carbon Dioxide and the positive effect it is having on the environment will be recognized by more and more countries*

- SE-118551241

These comments are noted, however, climate change legislation and the general achievement of emission reduction targets are outside the scope of the Mod-3 Application. The LRWF Project and current Mod-3 Application will assist the NSW and Commonwealth Governments to meet their commitments to transition to renewable electricity generation.

CWO REZ and existing use rights

The CWO REZ, which was supposed to be the model for the others, has been a disaster. I hope the locals, both lifestyle and farmers, repeat their objections on issues that have not been genuinely addressed or addressed at all. E.g. the impact on property prices, especially lifestyle properties. Remember, if you have a plot that has existing residential rights, but no residence at this stage, it must be assessed for all the relevant impacts: visual, noise etc. (I have confirmation in writing from the then Planning Secretary). Those impacted by the new grid distribution lines: keep it up. Those that had plans to subdivide as part of a retirement strategy, keep voicing your correct opinion that you have been financially impacted by the LRWF and other planned developments - SE-118551241

Each renewable energy project developed within the CWO REZ is subject to separate development assessment requirements. The LRWF Project and current Mod-3 Application will contribute to achieving the generation capacity targets associated with the CWO REZ however the overall success of the CWO REZ and the assessment of other projects are beyond the scope of the Mod-3 Application.

Energy Crisis and Global Economy

All of us are impacted by the rising cost of electricity, which has a significant effect on just about everything. All of us are affected by the subsidies and other financial contributions from all levels of Government. Why is our National Debt approaching 1 Trillion dollars? – partly because of the Federal, State and Local Government expenditure on renewables. We have wasted billions on failures. We were going to be the hydrogen superpower. Do you remember Snowy Hydro 2, or wave generation or tidal generation? Just from reports today, the Snowy 2 project is now expected to cost us \$42 Billion dollars (versus the original estimate of \$2 Billion). All of us are going to be severely hurt by the worldwide energy crisis. It is generally agreed that Australia is among the worst positioned of all countries, due in large part to our policies on what is fast becoming the climate change scam, with our 1 ½ refineries and ever diminishing fossil fuelled generators and our lack of fertilizer production and its price. Stock up on baked beans - SE-118551241

The direct control of electricity prices and national/global economic uncertainty is outside the scope of the assessment of the Mod-3 Application.

6.0 Updated Justification

This Submissions Report has been prepared to provide an analysis of the issues raised in government and community submissions and to add further clarification on details of the Mod-3 Application where necessary.

Following the exhibition of the Modification Report, the Applicant has continued to consult with relevant government agencies to address the requirements of the submissions and inform minor updates to the relevant specialist assessments. No changes to the Mod-3 Application have been identified through the detailed review of the matters raised in the submissions received, and the project justification remains consistent with the Modification Report.

The LRWF Project is strategically located within the CWO REZ, an area defined by the NSW Government for renewable energy development and has connection rights to the CWO REZ Transmission Line which supports the suitability of the site for the LRWF Project. The Mod-3 Application seeks to refine the design of the LRWF Project to improve constructability, reduce overall environmental impact and improve compatibility with agricultural land use. The Mod-3 Application does not change any aspect of the LRWF Project that would result in any change to the strategic context of the LRWF Project or the suitability of the site for wind energy generation development. On balance, the assessment of the Mod-3 Layout indicates there are no new or increased environmental impacts when compared to the Approved Development

The LRWF Project will make a positive contribution to meeting the NSW and Commonwealth Governments' commitments to transition to renewable electricity generation. The NEM needs to rapidly transition to renewable energy to support the NSW Climate Change Policy Framework, as well as the Commonwealth Government's commitments under the Paris Agreement. The LRWF Project will contribute to achieving this goal. The changes proposed by the Mod-3 Application result in a more optimised infrastructure layout and will help the Applicant progress the LRWF Project more efficiently into construction and operation, delivering clean renewable energy faster to electricity consumers in the NEM.

The Mod-3 Application therefore remains entirely consistent with the broader strategic context of the LRWF Project and will support the timely construction of the infrastructure while reducing its overall environmental impact.

The LRWF Project will provide long-term, strategic benefits to the State of NSW, including:

- Providing a significant boost in renewable energy supply to assist with fulfilling the current obligations under State and Commonwealth renewable energy targets.
- Providing for cleaner reliable electricity generation, assisting with meeting current load demand while reducing greenhouse gas emissions and the impacts of climate change.
- Providing regional investment in the NSW renewable energy sector.
- Making a positive contribution towards achieving the renewable energy target generation from the CWO REZ.

The changes proposed by the Mod-3 Application will assist with the constructability of the LRWF Project and the realisation of these key benefits. The detailed environmental impact assessments of the Mod-3 Layout confirm that with the continued implementation of the proposed management, mitigation and offset measures proposed by the Applicant, and the existing and proposed conditions of consent, it is considered that the Mod-3 Application would result in a net benefit to the NSW community, and therefore warrants approval.

7.0 References

Aviation Projects, 2023. Aviation Impact Assessment, Liverpool Range Wind Farm – EIS.

Aviation Projects, 2026. Aviation Impact Assessment, Liverpool Range Wind Farm – Modification 3.

Department of Environment and Conservation (DEC) and Andrew Long, 2005. Aboriginal scarred trees in New South Wales, a field manual.

Department of Planning, Housing and Infrastructure (DPHI), 2026. *State Significant Development Guidelines – Preparing a Submissions Report*.

Department of Planning, Housing and Infrastructure (DPHI), 2024. *Technical Supplement for Landscape Character and Visual Impact Assessment*.

Tilt Renewables, 2022. Liverpool Range Wind Farm Modification Assessment Report (Mod-1).

Umwelt, 2026. Biodiversity Development Assessment Report, Liverpool Range Wind Farm – EIS.

Appendix 1

Submissions Register



A.1 Government Authority Submissions

Name	View	Submissions Report Section
Conservation Programs, Heritage and Regulation (CPHR) - Conservation Planning and Offsets Division - Renewable Energy Biodiversity Support (REBS)	Comment	Section 4.1
Heritage NSW – Aboriginal Cultural Heritage	Comment	Section 4.2
Heritage Council of NSW	Comment	Section 4.3
NSW National Parks and Wildlife Service	Comment	Section 4.4
NSW Environment Protection Authority	Comment	Section 4.5
NSW Department of Climate Change, Energy, the Environment and Water – Water Group	Comment	Section 4.6
Crown Lands	Comment	Section 4.7
Civil Aviation Safety Authority	Comment	Section 4.8
Transport for NSW	Comment	Section 4.9
NSW Telco	Comment	Section 4.10
Warrumbungle Shire Council	Comment	Section 4.11
Upper Hunter Shire Council	Comment	Section 4.12
Midwestern Regional Council	Comment	Section 4.13
Muswellbrook Shire Council	Comment	Section 4.14

A.2 Community Submissions

Submission ID	View	Section where issue is addressed in Submissions Report
SE-118551241	Object	5.1.1, 5.1.6, 5.2, 5.5
SE-118606739	Object	5.1.1, 5.1.2, 5.1.4, 5.1.6, 5.1.7, 5.2, 5.3
SE-118611491	Object	5.1.1, 5.1.2, 5.1.7, 5.3, 5.5
SE-118625239	Object	5.1.2, 5.1.7,
SE-118644989	Object	5.1.1, 5.1.2, 5.2, 5.3,
SE-118649239	Object	5.3
SE-118651489	Object	5.1.1, 5.1.3, 5.1.5, 5.1.7, 5.2, 5.4, 5.5
SE-118656493	Object	5.1.5, 5.1.7, 5.3, 5.4, 5.5

Appendix 2

Management and Mitigation Measures

Appendix 2 – Management and Mitigation

The below table is adapted from the Statement of Commitments prepared for the Original Development and amended through the Mod-1 Development. It captures the relevant commitments made during the assessment of the Approved Development with minor revisions to reflect the Mod-3 Application. All relevant management and mitigation measures required to implement the Project are reflected in the Development Consent conditions which will continue to apply, as outlined in the Modification Report, no additional management and mitigation is proposed under the Mod-3 Application. Any requested amendments to the consent conditions included in the Mod-3 Application are outlined in **Appendix M of the Modification Report**.

SoC	Issue	Impact	Objective	Mitigation Tasks	Project Phase	Relevant Development Consent Condition	Assessment/Revised Commitment for Mod-3 Application
1	General	Environmental Impacts	Environmental Management	Implement an Environmental Management Strategy to manage the environmental impacts of the development including the obligations under the conditions of consent and this Statement of Commitments.	Construction	Condition 1 of Schedule 4 (Environmental Management Strategy)	No change
2	General	Environmental Impacts	Environmental Management	Implement the construction, operation and management of the wind farm in accordance with the Environmental Management Strategy, and in accordance with good industry practice in relation to environmental impacts including: - hydrology - soils and erosion - dust management and air quality - light pollution - health and safety - waste management - pest management, including weeds - Cultural Heritage - Biodiversity.	Construction and operation	Condition 1 of Schedule 4 (Environmental Management Strategy)	No Change
5	Noise	Construction noise	Minimise Impact	Implement reasonable and feasible measures to minimise construction noise impacts on nearby residences, including associated traffic noise. Manage noise generated by construction or decommissioning activities in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline. Implement a community consultation process to ensure adequate community awareness and notice of expected construction noise.	Construction	Condition 6 of Schedule 3 (Construction and Decommissioning Noise)	No Change
7	Noise	Operational noise	Compliance	Prior to construction, prepare a noise report providing final noise predictions based on any updated background data measured, the final turbine model and turbine layout selected, to demonstrate compliance with the relevant guidelines for all residences. This report can be provided to the Department upon request.	Detailed design	N/A	No Change

SoC	Issue	Impact	Objective	Mitigation Tasks	Project Phase	Relevant Development Consent Condition	Assessment/Revised Commitment for Mod-3 Application
10	Ecology	Environmental impacts	Environmental Management	Implement a post-construction Adaptive Bird and Bat Management Plan in consultation with the Department to determine the impacts of the project on bird and bat populations.	Detailed design	Condition 22 of Schedule 3 (Bird and Bat Adaptive Management Plan)	No Change
11	Ecology	Loss or modification of habitat	Avoid, minimise, offset	Prepare and implement an Offset Strategy, to offset residual impacts to native vegetation and habitat. The offset strategy would: - where possible, prioritise offset areas which provide for a reduction in fragmentation of native vegetation (in particular for areas adjoining existing reserves); - allow for the establishment of offset areas in phases as construction commences for each stage; - reflect the actual footprint of the development rather than the maximum impact areas identified in the Environmental Assessment. The Offset Strategy would be prepared in consultation with the Department, prior to construction. Actual offset areas would be secured within 2 years of the completion of construction of each stage of the project.	Within 2 years of completion of construction.	Conditions 18A and 19 of Schedule 3 (Biodiversity Offset)	Tilt Renewables are requesting that the retirement of credits is based on actual impacts, within the maximum limits specified in Appendix 8 of the Development Consent (to be amended as part of the Mod-3 Application), with a post-approval mechanism to confirm impacts and offset retirement obligation (refer to Appendix M). This will provide the flexibility to retire credits based on actual disturbance which will improve proportionality, encourage impact minimisation during construction, and minimises the risk of perverse environmental outcomes.
12	Aircraft Hazards	Potential hazard	Minimise Impact	Liaise with all relevant authorities (CASA, Airservices, and Department of Defence) and supply location and height details once the final locations of the wind turbines have been determined and before construction commences.	Detailed design	Condition 33 of Schedule 3 (Notification of Aviation Authorities)	No Change
14	Communication	Deterioration of signal strength	Avoid impact	Make good any disruption to radio or telecommunication services in the vicinity of the wind farm caused by the construction of the wind farm (including any disruption to television reception of nearby residents). Work closely with the Bureau of Meteorology to implement reasonable and feasible measures to address adverse impacts to the Namoi (Blackjack Mountain) weather radar. Work closely with NSW Telco to ensure any micro-siting of turbines do not encroach into the 2nd Fresnel zone of NSW Telco's proposed communication link.	Operation	Condition 36 of Schedule 3 (Radiocommunications)	No Change

SoC	Issue	Impact	Objective	Mitigation Tasks	Project Phase	Relevant Development Consent Condition	Assessment/Revised Commitment for Mod-3 Application
15	Traffic	Safety and asset protection	Minimise Impact	Develop and implement a Traffic Management Plan (TMP) in consultation with RMS and Councils to facilitate appropriate management of potential traffic impacts. The plan would include use of appropriately licensed haulage contractors with experience in transporting similar loads, who would be responsible for obtaining all required approvals and permits from the RMS and Councils and for complying with conditions specified in those approvals.	Construction	Condition 31 of Schedule 3 (Traffic Management Plan)	No Change – proposed changes to the wording of the associated condition are proposed in Appendix M .
16	Traffic	Safety and Asset protection	Minimise Impact	Implement road upgrades and repairs along those roads that are proposed to be used by Over-dimensional (OD) and Heavy vehicles.	Construction	Conditions 28 (Road Upgrades) and 29 (Road Maintenance) of Schedule 3	No Change – proposed changes to the wording and timing of the associated condition are proposed in Appendix M .
17	Bushfire	Bushfire risk	Minimise Impact	Prepare a Bushfire Management Plan in consultation with the Rural Fire Service and NSW Fire Brigade to manage bushfire risks during construction, operation and decommissioning. The plan would as a minimum include: - During the construction phase, appropriate firefighting equipment would be held onsite for use when the fire danger is very high to extreme, and a minimum of one person on site would be trained in its use. The equipment and level of training would be determined in consultation with the local RFS. - Asset Protection Zones (APZs) established around structures as a buffer to prevent direct flame contact. APZs are to be calculated in accordance with the requirements of Planning for Bushfire Protection 2019. - Substations would be bunded with a capacity exceeding the volume of the transformer oil to contain the oil in the event of a major leak or fire. The facilities would be regularly inspected and maintained to ensure leaks do not present a fire hazard, and to ensure the bunded area is clear (including removing any rainwater). - Appropriate training and bushfire management protocols would be included in the Environmental Management Strategy.	Construction Operation Decommissioning	Condition 37 of Schedule 3 (Bushfire)	No Change
18	Hydrology	Water entitlement	Compliance	Obtain all necessary water entitlements required for the extraction of water for construction of the project.		Condition 15 of Schedule 3 (Water Supply)	No Change

<i>SoC</i>	<i>Issue</i>	<i>Impact</i>	<i>Objective</i>	<i>Mitigation Tasks</i>	<i>Project Phase</i>	<i>Relevant Development Consent Condition</i>	<i>Assessment/Revised Commitment for Mod-3 Application</i>
19	Economic Benefits	Effect on local community	Maximise positive impact	Liaise with local industry representatives to maximise the use of local contractors and manufacturing facilities in the construction, operation and decommissioning phases of the project. Make available employment opportunities and training for the ongoing operation of the wind farm to local residents where reasonable. Prepare an Accommodation and Employment Strategy.	Construction	Condition 42E of Schedule 3 (Accommodation and Employment Strategy)	No Change
21	Community Consultation	Project Information	Inform Community	Appoint a community liaison officer to be available for consultation by the community and to provide information to the community about the status of the project.	Construction Operation	N/A	No Change
22	Community Consultation	Project Information	Community liaison	Continue with the Community Consultation Committee as required during various stages of the project life cycle.	Construction Operation	Condition 3 of Schedule 4 (Community Consultative Committee)	No Change
23	Traffic	Safety and Asset Protection	Minimise Impact	Where road upgrades are delivered in a staged manner, ensure that damage to roads caused by Heavy or OSOM vehicles associated with the construction of the proposed development are repaired/maintained in a timely manner so that existing levels of safety and efficiency of the relevant roads is maintained.	Construction	Conditions 28 (Road Upgrades) and 29 (Road Maintenance) of Schedule 3	No Change – proposed changes to the wording and timing of the associated condition are proposed in Appendix M .
24	Traffic	Safety and Asset Protection	Minimise Impact	Ensure the portion of Gundare Road that is located within the Modified Site Boundary is only used by Heavy and Light vehicles to construct and maintain the relevant section of transmission line. No portion of Gundare Road external to the Modified Site Boundary shall be used by vehicles associated with the proposed development to access the Project site during construction or operational phases.	Construction and Operations	Condition 26 (Designated Heavy and Over- Dimensional Vehicle Routes) of Schedule 3	No Change
25	Traffic	Safety and Asset Protection	Minimise Impact	Enter into an agreement with Warrumbungle Shire Council (WSC) to ensure that the portion of Gundare Road within the Modified Site Boundary is upgraded to a fit-for-purpose standard and maintained at no cost to WSC throughout the life of the Project.	Detailed design, Construction, and Operations	N/A	No Change

<i>SoC</i>	<i>Issue</i>	<i>Impact</i>	<i>Objective</i>	<i>Mitigation Tasks</i>	<i>Project Phase</i>	<i>Relevant Development Consent Condition</i>	<i>Assessment/Revised Commitment for Mod-3 Application</i>
26	Economic Benefits	Community Enhancement	Benefit Sharing	The Applicant will prepare a Benefit Sharing Plan (BSP), that sets out how additional benefits will be realised during the construction period and in the early years of operations. Should all 185 turbines be constructed, the financial benefit sharing commitments would equate to approximately \$1.2 million per annum during the construction period (including the VPA), approximately \$1.2 million per year for the first 5 years of operations (including VPA and other commitments), and approximately \$800,000 per year (through the VPA) for the rest of the life of the Project. If the Project is staged, so will the programs within the BSP.	Detailed design, Construction, and Operations	N/A	The Applicant will prepare a Benefit Sharing Plan (BSP), that sets out how additional benefits will be realised during the construction period and in the early years of operations. Should all 173 turbines be constructed, the financial benefit sharing commitments would equate to approximately \$1.1 million per annum during the construction period (including the VPA) and approximately \$1.3 million per year (through the VPA) for the life of the Project. If the Project is staged, so will the programs within the BSP.
27	Traffic	Safety and Asset Protection	Minimise impacts	Undertake a targeted consultation program to communicate the proposed works to remove the existing seals along Pandora Road, Rotherwood Road, and Turee Vale Road prior to works commencing along those roads. Implement appropriate dust suppression measures and complaints management procedures during those works. At completion of construction and prior to hand-back to the relevant road authority, re-apply a sealed treatment to those relevant sections of roads to the standards agreed with the relevant roads authority.	Detailed design, Construction	N/A	Mitigation requirement updated to remove Turee Vale Road no longer impacted.
28	Noise and vibration	Construction noise and vibration	Mitigate Impacts	In the event that monitoring identifies that ancillary infrastructure associated with Project (such as the TWA Facility) is causing demonstratable impacts to neighbouring landowners the Applicant will: - Consult with the landowner in good faith to understand their concerns and identify a resolution; - Negotiate with the landowner to enter into a Neighbour Agreement which may include consideration of providing targeted, reasonable, and feasible mitigation measures or other mitigation such a compensation.	Detailed design, Construction	N/A	No Change
29	Economic Benefits	Effect on local community	Maximise positive impact	Prepare a Social Impact Management Plan (SIMP) for the proposed TWA Facility in accordance with the Preliminary Social Impact Management Plans set out in the respective Social Assessments (Umwelt, 2023).	Construction	N/A	No Change



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