



Burrendong Wind Farm

Submissions Report

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Contents

1. Introduction	1
1.1. Overview	1
1.2. Overview of the Project	1
2. Analysis of Submissions	3
2.1. Submissions Summary	3
2.1.1. Agency Submissions	3
2.1.2. Local Government Submissions	4
2.1.3. Public Submissions	4
2.2. Categorisation of Submissions	10
2.2.1. Objecting Submissions	10
2.2.2. Supporting Submissions	12
2.2.3. Comment Submissions	13
3. Actions Taken Since Exhibition	14
3.1. Ongoing Stakeholder Engagement	14
3.2. Amendments to the Project	17
3.2.1. Project Site Refinement	17
3.2.2. Impacted Receivers assessed and status update	22
3.2.3. Accommodation and Employment	22
3.2.4. Additional Management and Mitigation Measures	22
3.3. Further Assessment	22
4. Response to Submissions	27
4.1. Agency Submissions	27
4.1.1. Biodiversity Conservation and Science Group	27
4.1.2. Civil Aviation Safety Authority	47
4.1.3. Crown Lands	49
4.1.4. Department of Planning and Environment: Hazards	49
4.1.5. Department of Planning and Environment: Water	50
4.1.6. Department of Primary Industries: Agriculture	53
4.1.7. Department of Primary Industries: Fisheries	53
4.1.8. Environment Protection Authority	54
4.1.9. Fire and Rescue NSW	59
4.1.10. Heritage Council of NSW (Aboriginal Heritage)	59
4.1.11. Heritage Council of NSW (Historic Heritage)	65
4.1.12. Mining, Exploration and Geosciences NSW	65
4.1.13. NSW Rural Fire Service	66
4.1.14. Transport for NSW	68
4.1.15. UGL Regional Linx	76
4.1.16. WaterNSW	77

4.2. Local Government Submissions	82
4.2.1. Dubbo Regional Council	82
4.2.2. Mid-Western Regional Council	84
4.3. Public Submissions	97
4.3.1. Environment, Economic and Social Impacts	97
4.3.2. Justification of the Project	143
4.3.3. The Project	147
4.3.4. Procedural Matters	149
4.3.5. Issues Beyond the Scope of the Project	151
5. Updated Project Justification	153
5.1. Strategic Need for the Project	153
5.2. Evaluation of Submissions and Project Benefits	154
5.2.1. Site Suitability	154
5.2.2. Environmental, Social and Economic Considerations	154
5.3. Ecologically Sustainable Development	155
6. Conclusion.....	156
7. References	158
Appendix A : Submissions Register	163

List of Figures

Figure A1-1: Project Site Regional Context	x
Figure A1-2: Key issues raised in objecting submissions	xi
Figure A1-3: Geographic distribution of objecting and supporting submissions by proximity to the Project Site	xii
Figure A1-4: Geographic distribution of submissions (map)	xiii
Figure A1-5: Number of submissions received for each identified sub-theme	xiv
Figure A1-6: Reduction in impacts between the EIS layout and amended layout	xv
Figure A1-7: Amended Project Layout	xvii
Figure A1-8: Key Stakeholder Groups Engaged	i
Figure A1-9: Planning and Approval Process	iii
Figure A1-10: Key Project Benefits	v
Figure 1-1: Project Site Regional Context	2
Figure 2-1: Summary of Submissions Received	3
Figure 2-2: Geographic Distribution of Submissions by Type	6
Figure 2-3: Local Suburbs within 5 km Radius of the Project Site	7
Figure 2-4: Geographic distribution of objecting submissions	8
Figure 2-5: Key issues raised in objecting submissions	9
Figure 2-6: Geographic distribution of supporting submissions	9
Figure 2-7: Submissions Objecting to the Project Based on the Subtheme of the Submission	11
Figure 3-1: EIS Project Layout	20
Figure 3-2: Amended Project Layout	21

Figure 4-1: Impacts to Box-Gum Woodland from Project inception through to the current Development Footprint	37
Figure 4-2: Inaccessible areas	44
Figure 4-3: Estimated airblast overpressure level of $K_a = 50$ and $A = -1.45$	57
Figure 4-4: Estimated ground vibration levels for $K_g = 1140$ and $B = 1.6$	57
Figure 4-5: 19 m truck-and-dog left turn swept path into Burrendong Way from Mitchell Highway	73
Figure 4-6: 19 m truck-and-dog right turn swept path from Burrendong Way into Mitchell Highway	74
Figure 4-7: WTG 19 envelope based on 180 m rotor diameter, relative to 0.6 multiplied by maximum 1st Fresnel Zone extent of Link 1 (Middleton Group 2024b)	78
Figure 4-8: Topography of Link 1's path, Line of Sight, Turbine location and expected link path considering knife edge diffraction (Middleton Group 2024b)	79
Figure 4-9: Updated LVIA receivers within the black and blue line of visual magnitude	101
Figure 4-10: Results of the ZVI for Worlds End Road (Moir Studio 2026)	103
Figure 4-11: Wire Frame Diagram prepared from U8-1: 2022 Superseded layout (Moir Studio 2026)	105
Figure 4-12: MWTT considering the Project, Piambong Wind Farm and Uungula Wind Farm (Moir Studio 2026)	108
Figure 4-13: Cumulative ZVI with Piambong Wind Farm (Moir Studio 2026)	109
Figure 4-14: Cumulative ZVI with Piambong Wind Farm and Uungula Wind Farm (Moir Studio 2026)	110
Figure 4-15: Estimated Construction Workforce for during the 2 year construction period	115
Figure 4-16: Land and Soil Capability of the Project Site	120
Figure 4-17: WTGs with Aviation Hazard Lighting proposed at hub height (Moir Studio 2026)	136
Figure 4-18: Updated renewable energy projects within proximity to the Project	142
Figure 4-19: Average life-cycle grams of CO ₂ e emissions per kWh by generation source (WEA, 2022)	144
Figure 4-20: Calculated LCOE by technology and category for 2022 (CSIRO 2023).	145

List of Tables

Table 2-1: Breakdown of submissions made by individuals and organisations	4
Table 2-2: Number of Submissions in Support or Objection to Identified Environmental, Social and Economic Sub Themes.	11
Table 3-1: Ongoing Consultation Since Exhibition of EIS	14
Table 3-2: Reduction of Project areas from EIS to submissions report	19
Table 3-3: Additional technical studies and outcomes for the Project	23
Table 4-1: Threatened fauna species with partial surveys	29
Table 4-2: Threatened flora species with partial surveys	31
Table 4-3: Additional BBUS Surveys Information	31
Table 4-4: Species observed flying at RSA height within the Development Corridor (65-250 m)	32
Table 4-5: Additional Targeted Surveys for Candidate Species	35
Table 4-6: Summary details of offset properties Options A and Options B	37
Table 4-7: Potential PCT's	41
Table 4-8: Location of PCTs that were inaccessible within the Development Footprint (as of 2026)	43
Table 4-9: Proposed mitigation for potential blast events	55
Table 4-10: Receivers within 3 km of the proposed WTG (reproduced from Table 29 of the EIS (ELA 2023a)	58
Table 4-11: Terms of DRC Offer	82
Table 4-12: Terms of MWRC Offer	85
Table 4-13 Average Modal Split of One-Way Traffic Generation	92
Table 4-14 Average Modal Split of One-Way Traffic Generation (based CWAS workforce, wit TWAF)	92

Table 4-15: Development Applications and Development Consent for Land Parcels 99

Table 4-16: Buildings within 5 km of the nearest WTG 99

Table 4-17: Light visible distances (CASA 2022)..... 134

Table 6-1 Project Amendments Summary 156

Abbreviations

Abbreviation	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACMA	Australian Communications and Media Authority
AEMO	Australian Energy Market Operator
AHIMS	Aboriginal Heritage Information Management System
AHD	Australian Height Datum
AHL	Aviation Hazard Lighting
AIA	Aviation Impact Assessment
ANZECC	Australian and New Zealand Environmental and Conservation Council
APZ	Asset Protection Zone
Ark Energy	Ark Energy Corporation Pty Ltd
AS	Australian Standard
ASA	Airservices Australia
BAM	Biodiversity Assessment Method
BAM-C	BAM Calculator
BBAMP	Bird and Bat Adaptive Management Plan
BBUS	Bird and Bat Utilisation Surveys
BC Act	<i>Biodiversity Conservation Act 2016</i>
BCS	Biodiversity, Conservation and Science Group
BDAR	Biodiversity Development Assessment Report
BFEMOP	Bush Fire Emergency Management and Operations Plan
BM	Benchmark
BMP	Biodiversity Management Plan
BPA	Bisphenol A
BRA	Bushfire Risk Assessment
BUS	Bird Utilisation Survey
BSAL	Bio Strategic Agricultural Land
CASA	Civil Aviation Safety Authority
CEC	Clean Energy Council
CEMP	Construction and Environmental Management Plan
CIV	Capital Investment Value
CMOH	Chief Medical Officer of Health
CNVG	Construction Noise and Vibration Guidelines
CO₂e	Carbon Dioxide Equivalent

Abbreviation	Description
CRM	Collision Risk Model
CSIRO	Commonwealth Scientific and Industrial Research
CWAS	Construction Worker Accommodation Strategy
CWO	Central West Orana
DCCEEW (Cmw.)	Department of Climate Change, Energy, the Environment and Water (Commonwealth)
DCCEEW (NSW)	Department of Climate Change, Energy, the Environment and Water (NSW) – formerly DPE
DECCW (NSW)	Department of Environment, Climate Change and Water
DCP	Development Control Plan
DNG	Derived Native Grassland
DoD	Department of Defence
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure – formerly DPE
DPI	Department of Industry
DRC	Dubbo Regional Council
DRMP	Decommissioning and Rehabilitation Management Plan
EIA	Economic Impact Assessment
EIS	Environmental Impact Statement
ELA	Eco Logical Australia Pty Ltd.
EMF	Electric and Magnetic Fields
EMG	Electromyography
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	Environmental Protection Authority
EPBC Act	<i>Environment Protection & Biodiversity Conservation Act 1999</i>
EPHC	Environmental Protection and Heritage Council
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue New South Wales
FTE	Full-Time Equivalent
GHG	Green House Gas
HIPAP	Hazardous Industry Planning Advisory Papers
IARC	International Agency for Research on Cancer
IBRA	Interim Biogeographic Regionalisation of Australia
ICAO	International Civil Aviation Organisation
ICNIRP	International Commission on Non-Ionizing Radiation Protection

Abbreviation	Description
IEA	International Energy Agency
IPA	Inner Protection Area
IRENA	International Renewable Energy Agency
kWh	Kilowatt Hours
LCOE	Levelised Cost of Energy
LCU	Landscape Character Unit
LEP	Local Environmental Plan
LGA	Local Government Area
LLS	Local Land Services
LoS	Line of Sight
LSALT	Lowest Safest Altitude
LSC	Land and Soil Capability
LVIA	Landscape and Visual Impact Assessment
MDA	Marshall Day Acoustics
MEG	Mining, Exploration and Geoscience (MEG) NSW
mG	milligauss
MLA	Moir Landscape Architects
MNES	Matters of National Environmental Significance
MW	Megawatts
MWh	Megawatt Hours
MWRC	Mid-Western Regional Council
MWTT	Multiple Wind Turbine Tool
NASF	National Airports Safeguarding Framework
NEM	National Electricity Market
NOA	Naturally Occurring Asbestos
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
OSOM	Over Size Over Mass
PBP	Planning of Bushfire Protection
PCT	Plant Community Type
POEO Act	<i>Protection of Environment Operations ACT 1997</i>
PwC	Price Waterhouse Cooper
QLD	Queensland

Abbreviation	Description
RAPs	Registered Aboriginal Parties
REZ	Renewable Energy Zone
RFS	Rural Fire Service
RSA	Rotor Sept Area
RTS	Response to Submissions
SAII	Serious and Irreversible Impact
SEARs	Secretary Environmental Assessment Requirements
SEH	South Eastern Highlands
SHR	State Heritage Register
SIA	Social Impact Assessment
SOS	Save Our Surroundings
SSD	State Significant Developments
TARP	Trigger Action Response Plan
TECs	Threatened Ecological Communities
TfNSW	Transport for New South Wales
the Project	Burrendong Wind Farm
the Proponent	Burrendong Wind Farm Pty Ltd
TMP	Traffic Management Plan
TSS	Total Suspended Solids
TSSC	Threatened Species Scientific Committee
TTG	The Turbine Group
TTIA	Traffic and Transport Impact Assessment
UN	United Nations
VIC	Victoria
VIS	OEH Vegetation Information System
WARR Act	<i>Waste Avoidance and Resource Recovery Act 2001</i>
WMP	Waste Management Plan
WTG	Wind Turbine Generators
WVWAC	Wellington Valley Wiradjuri Aboriginal Corporation
ZVI	Zone of Visual Influence

Executive Summary

ABOUT THE PROJECT

The Burrendong Wind Farm (the Project) is a wind energy project, consisting of up to 70 Wind Turbine Generators (WTGs). The total installed capacity is approximately 400 - 500 megawatts (MW). The Project is located within the traditional lands of the Wiradjuri Aboriginal Nation, approximately 30 km west of Mudgee, New South Wales (NSW) (Figure A1-1). It will be located within the Central-West Orana (CWO) Renewable Energy Zone (REZ).

The WTGs consist of rotating blades that capture wind energy, spinning a turbine and generating electricity. The electricity produced by the Project is used to supply the National Electricity Market (NEM) and is supported by an existing 330 kilovolts (kV) transmission line. The Project will produce clean energy, enough to power the equivalent of 247,000 average NSW households each year. The electricity generated by the Project would also provide up to 900,000 tonnes of carbon dioxide equivalent emissions (CO₂e) savings annually. The Project includes the installation, operation and decommissioning of the wind farm.

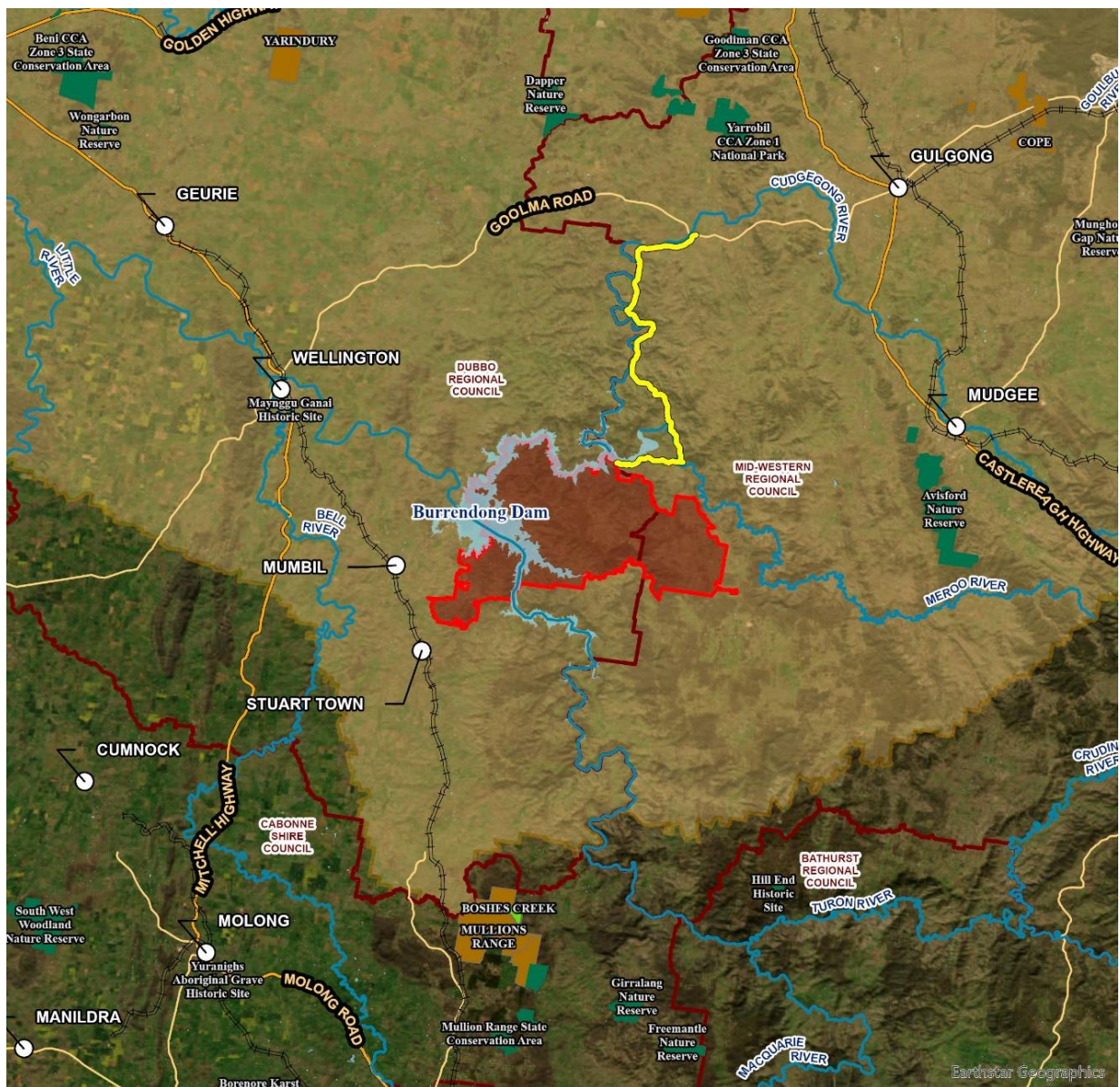


Figure A1-1: Project Site Regional Context

WHAT ARE THE KEY ISSUES

The key issues raised through submissions to the Project were primarily related to environmental, social and economic impacts (Figure A1-2). It is noted that several issues were raised across various submissions, therefore the number of issues raised is greater than the total number of submissions received.

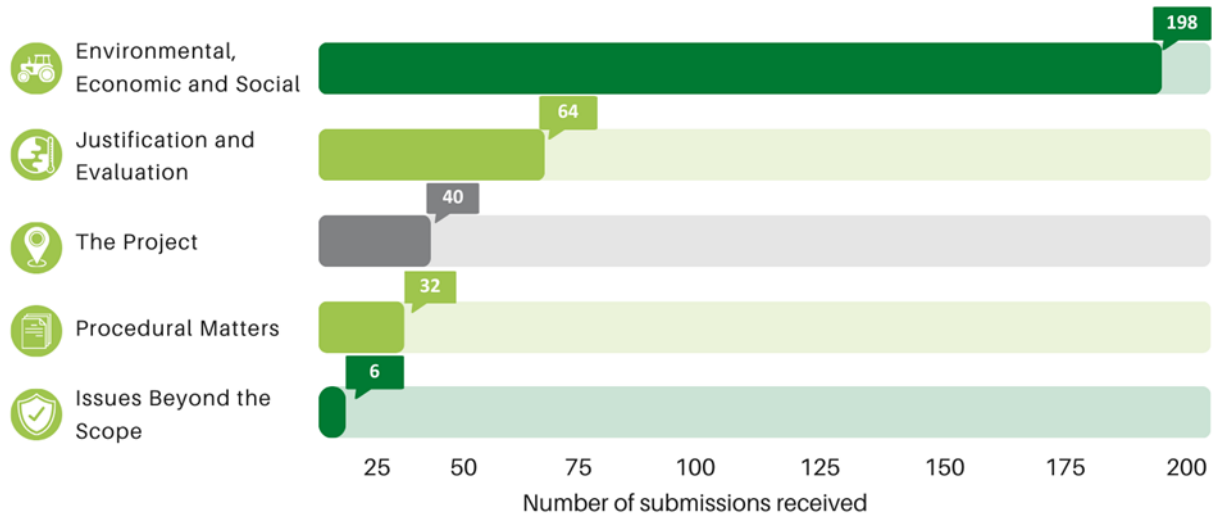


Figure A1-2: Key issues raised in objecting submissions

THE KEY CONCERNS IDENTIFIED CAN BE CATEGORIZED INTO FIVE (5) GROUPS

- 
Environmental, economic and social impacts – Impacts of the Project on visual, biodiversity, heritage, transport, social, accommodation, agricultural and community factors.
- 
Justification and evaluation – Consistency of the Project as a whole with various government plans, policies or guidelines.
- 
The Project – the physical Project Site, the physical layout, design, timing of key activities and land uses.
- 
Procedural matters – the level and quality of consultation, compliance with the SEARs, the identification and implementation of relevant statutory requirements
- 
Issues beyond the scope of the Project – broader policy issues or concerns not relevant to the Project specifically (e.g. insurance and modern slavery).

SUBMISSION SNAPSHOT

An Environmental Impact Statement (EIS) was prepared for the Project as part of the approvals process for State Significant Development (SSD) in NSW. The purpose of the EIS is to outline the proposed development and assess the environmental, social and economic impacts and benefits of the Project, while proposing measures to mitigate, manage and offset any impacts that arise. The EIS was submitted, then placed on public exhibition by the NSW Department of Planning, Housing and Infrastructure (DPHI) for a period of 28 days in from 16 November 2023 to 20 December 2023.

During the public exhibition period, 256 submissions were received for the Project, including:

- 13 government agency submissions

- 2 local government submissions
- 241 community submissions.

Of the 241 community submissions (including both individuals and organisations), six (6) (2.6%) were in support of the Project, 231 (95.7%) were objections, and four (4) (1.7%) were comments providing neither support nor opposition for the Project.

GEOGRAPHIC DISTRIBUTION OF SUBMISSIONS

Figure A1-3 below outlines the geographic distribution of both objecting and supporting comments. Most objecting submissions were received from those within the broader community (<100 km from the Project Site). Those supporting the Project were roughly split between the regional community (within 100 km of the Project Site) and the broader community. Figure A1-4 depicts the location of the submissions, largely located within NSW.

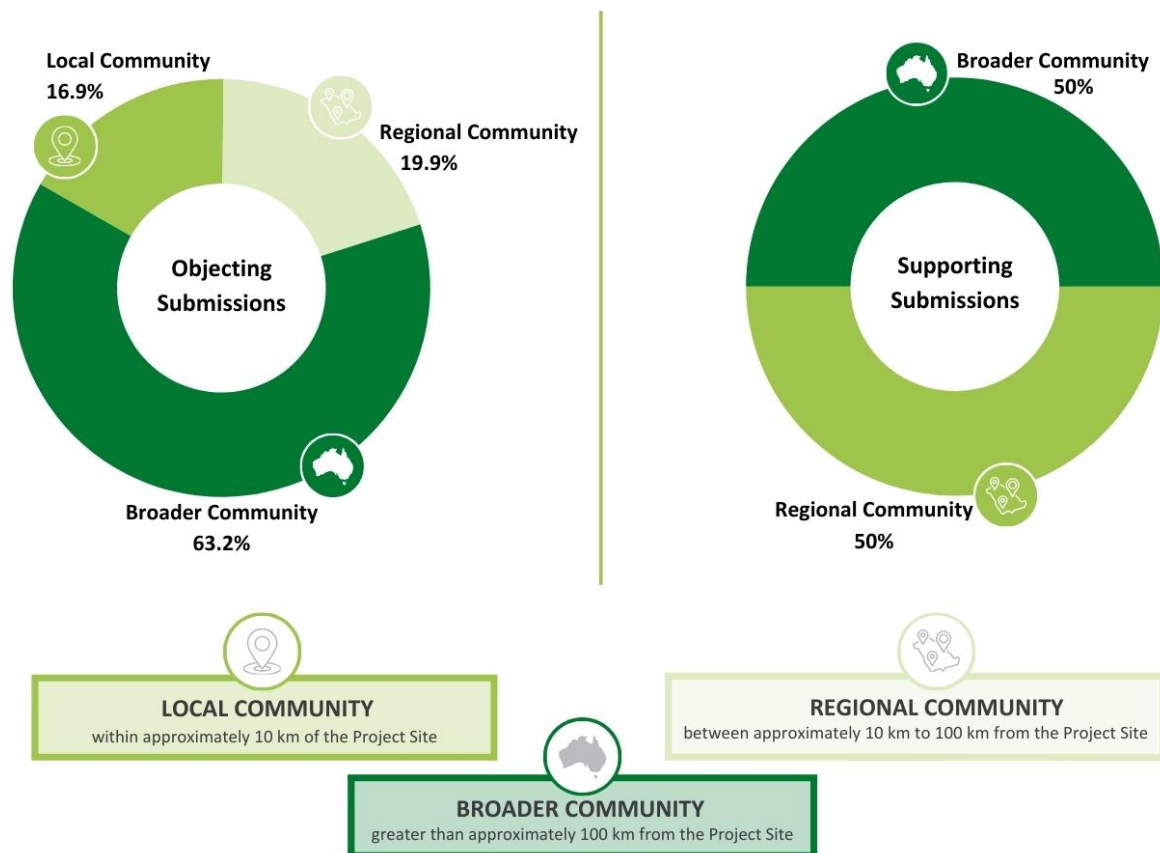


Figure A1-3: Geographic distribution of objecting and supporting submissions by proximity to the Project Site

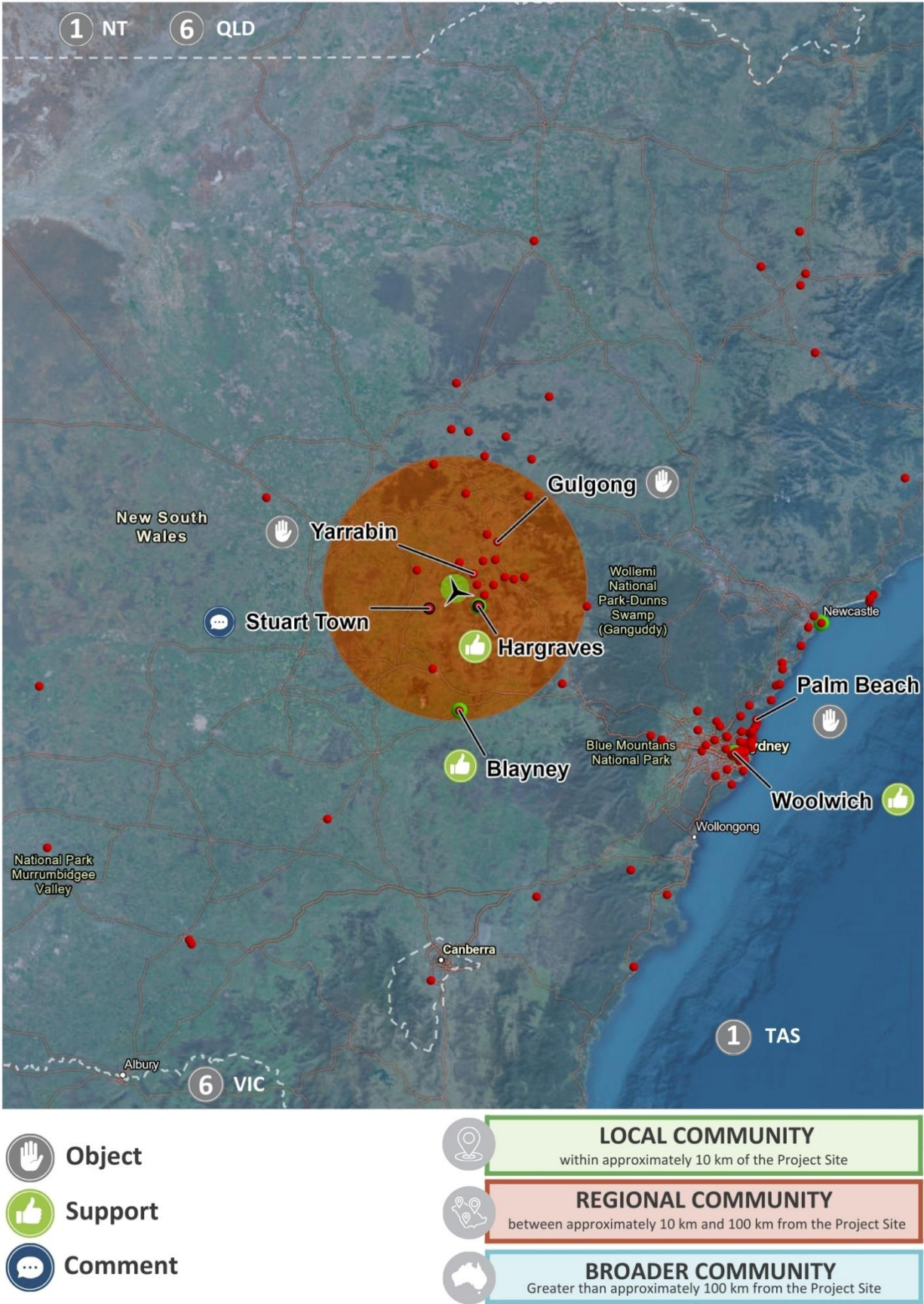


Figure A1-4: Geographic distribution of submissions (map)

BREAKDOWN OF INDIVIDUAL ISSUES RAISED IN SUBMISSIONS

The most frequently raised issues within the theme of environmental, economic and social impacts were regarding the potential visual and biodiversity impacts, followed by health & wellbeing, noise & vibration and economic impacts. Figure A1-5 outlines the number of submissions received for each sub theme.

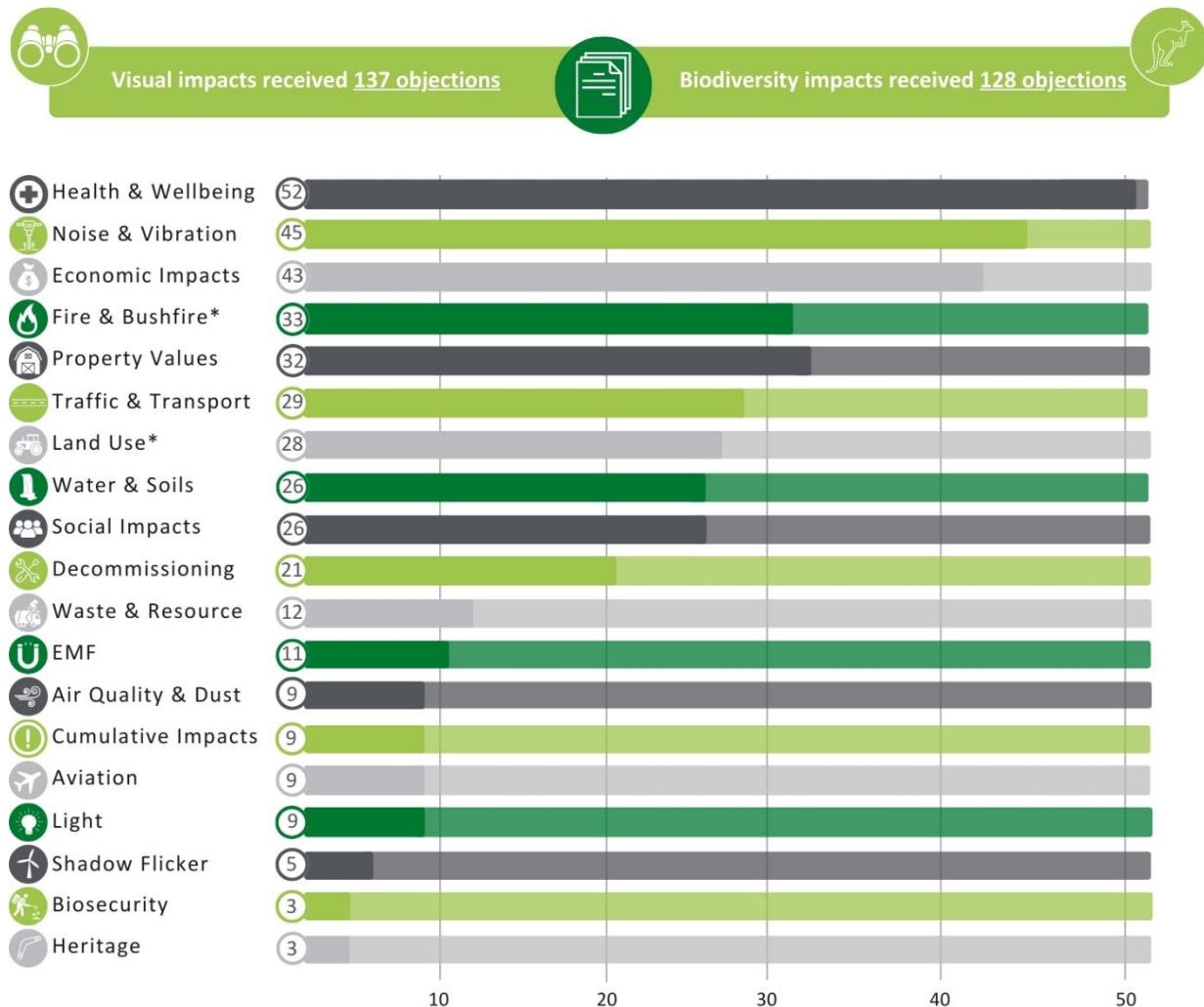


Figure A1-5: Number of submissions received for each identified sub-theme¹

KEY REASONS FOR PUBLIC SUPPORT

The three (3) key reasons for support referenced in the submissions included:

- the importance of moving towards increased renewable energy generation and away from polluting fossil fuels
- the positive environmental benefits of the Project, both big and small, including emissions reduction and better bushfire protections from internal road infrastructure
- the increased economic support from the Project to local landholders and their farms.

¹ at least one submission was received in support of this sub-theme

HOW THE PROJECT HAS EVOLVED

The submissions process has allowed the Proponent to consider community and agency feedback and further refine the Project to address these concerns where possible, and further reduce impacts associated with the Project. These changes have helped shape the Project into a renewable project that better aligns with community and agency needs. The key changes made following the response to submissions include:



Reduction of impacts to Box Gum Woodland from 112.4 hectares (ha) to 74.51 ha.



Selection of Southern Transmission line to avoid impacts to Aboriginal heritage and flora/fauna species.



Additional mitigation measures and revised management plans.

The Project has undergone a comprehensive and iterative design process. Community consultation and stakeholder feedback has been a key element of the Project evolution, in conjunction with the findings of numerous environmental and social studies. This approach has allowed the Proponent to maximise positive social, economic and environmental outcomes while avoiding and minimising any negative impacts, providing a net positive outcome. This process has allowed further refinement of the Project following responses from the community and government agencies, with the reduced impacts outlined in Figure A1-6.

The Development Footprint of the Project (the area in which the works will take place), will be approximately 741 ha (incorporating Option A and B). This represents a reduction of approximately 114 ha compared to the Development Footprint outlined in the EIS (ELA 2023a). The Development Footprint involves the areas of the Project that host infrastructure used for both the construction phase and operation phase.

The total Project Site has been reduced from 29,176 ha to 26,933 ha, a reduction of 2,243 ha.

The buffer around the Development Footprint is known as the Development Corridor and ranges from 0 m to 100 m. The Development Corridor allows for flexibility in locating WTGs and Project infrastructure during the detailed design and construction phases to accommodate additional constraints that may be determined. The Development Corridor has been reduced from 3,058 ha in the EIS (ELA 2023a) to 1,317 ha, a total reduction of 1,741 ha.

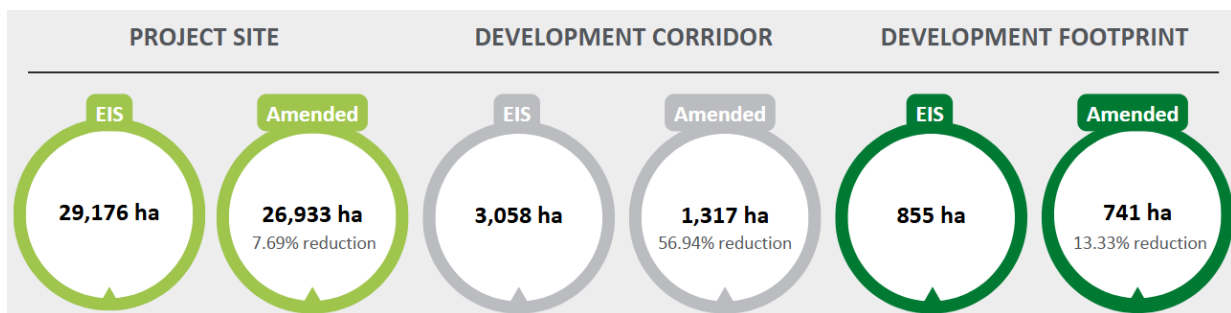


Figure A1-6: Reduction in impacts between the EIS layout and amended layout

A key concern raised by Mid-Western Regional Council (MWRC) and other submissions was the impact of the Project on accommodation as a result of the influx of construction workers. As a result, the Proponent has included a Temporary Workers Accommodation Facility (TWAF) within the previously assessed Development Footprint and prepared a Construction Workforce and Accommodation Strategy (CWAS) to address these issues and go beyond measures identified in the EIS. In consultation with key stakeholders, the strategy includes:



The Proponent has committed to reducing the impact of the influx of workers to communities in the Dubbo Regional Council (DRC) and MWRC Local Government Areas (LGA) through construction of a TWAF within the Project Site to reduce accommodation pressures in surrounding towns.

The construction of a TWAF within the Project Site will help to alleviate pressure on local housing stock and allow for Project construction staff to inject money into the local economy without impacting already limited housing supplies.

To further reduce potential impacts, the Proponent has followed the hierarchy of avoid - minimise - mitigate - offset. In the first instance, all efforts have been made to avoid potential environmental, social and cultural impacts, with offsets only considered after all other avenues were exhausted. The amended Project layout is shown below (Figure A1-7).

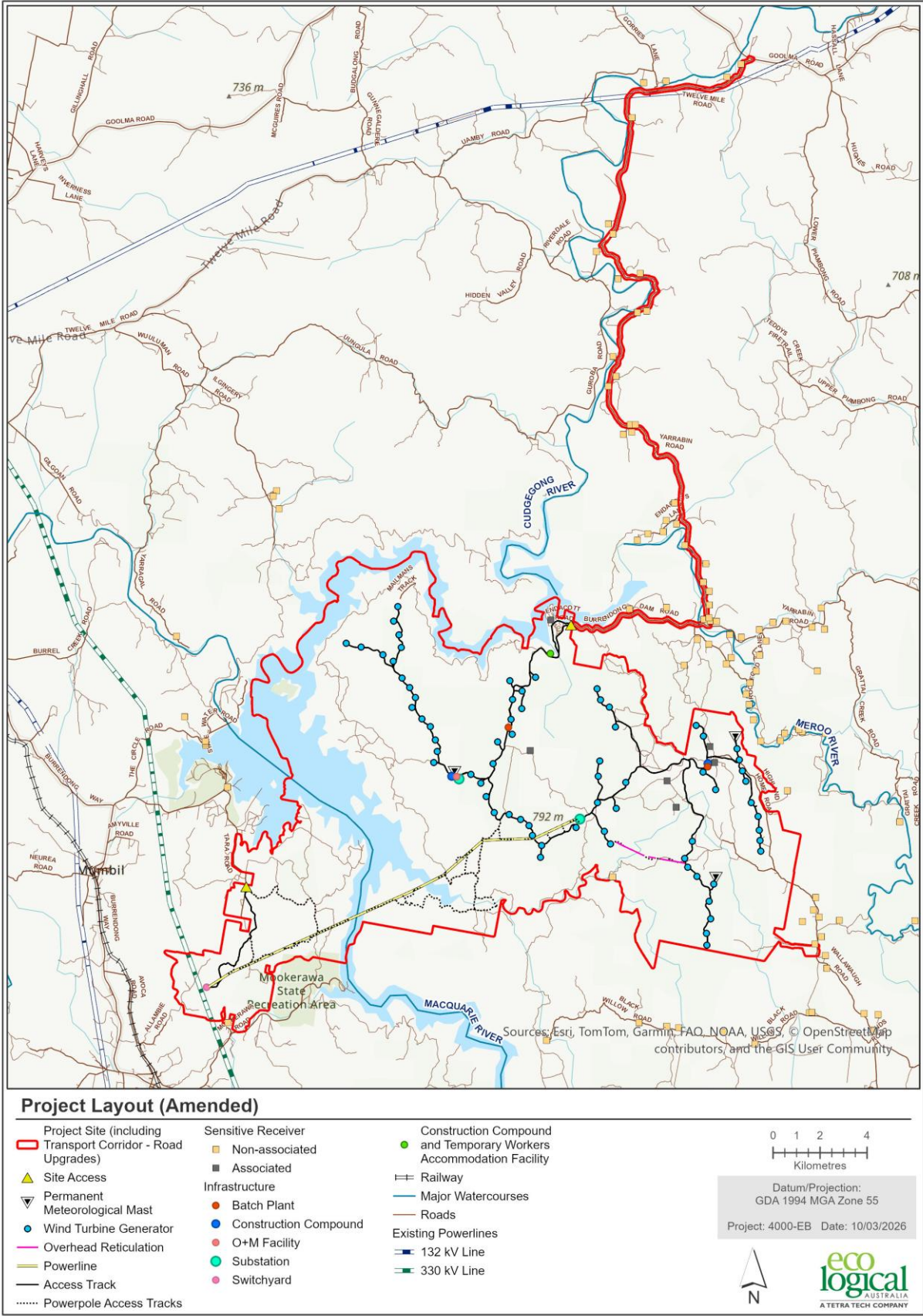


Figure A1-7: Amended Project Layout

STAKEHOLDER ENGAGEMENT

The Proponent understands the importance of effective and comprehensive consultation. As such, consultation with communities and key stakeholders has been ongoing since early 2020 to build meaningful relationships within the community and engage with questions, concerns and queries from various stakeholders.

The Response to Submissions (RtS) phase provided an opportunity for all stakeholders to raise issues about and provide comments on the Project. The Proponent has carefully reviewed and analysed all submissions received and has subsequently amended the Project layout to further reduce potential impacts.

As a result of the Amended Project, technical assessments have been updated and detailed responses have been provided to further illustrate how the Project seeks to maximise benefits and minimise impacts to various stakeholders and environmental values.

The Proponent has continued to consult with key government agencies and stakeholders since the EIS was exhibited and values the input received. This has included consultation with local councils, stakeholders and relevant agencies in response to their submissions. Figure A1-8 provides an overview of the range of stakeholders that the Proponent has actively engaged with throughout the planning and approvals process.



Figure A1-8: Key Stakeholder Groups Engaged

PLANNING AND APPROVAL PROCESS

The Project requires both State and Commonwealth approval under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). In accordance with the EP&A Act, the Project is an SSD given the scope and cost of the works. The Project similarly requires assessment and approval in accordance with the Commonwealth EPBC Act due to its potential to impact on Commonwealth listed threatened species, migratory species and communities.

This Submissions Report is a mechanism used to allow the Proponent to make changes and amendments to the Project in response to public and relevant agencies feedback during the public exhibition period. It also allows for the inclusion of additional mitigation and management measures.

As the Project received greater than 50 objections, the Independent Planning Commission (IPC) is the consent authority. DPPI will complete its assessment of the merits of the application and submit its recommendation for approval, or otherwise, to the IPC. The IPC will then consider all relevant information regarding the Project and decide whether to approve or refuse the Project. Figure A1-9 provides a diagram of the approval process from the scoping stage to the approval and implementation of consent conditions.

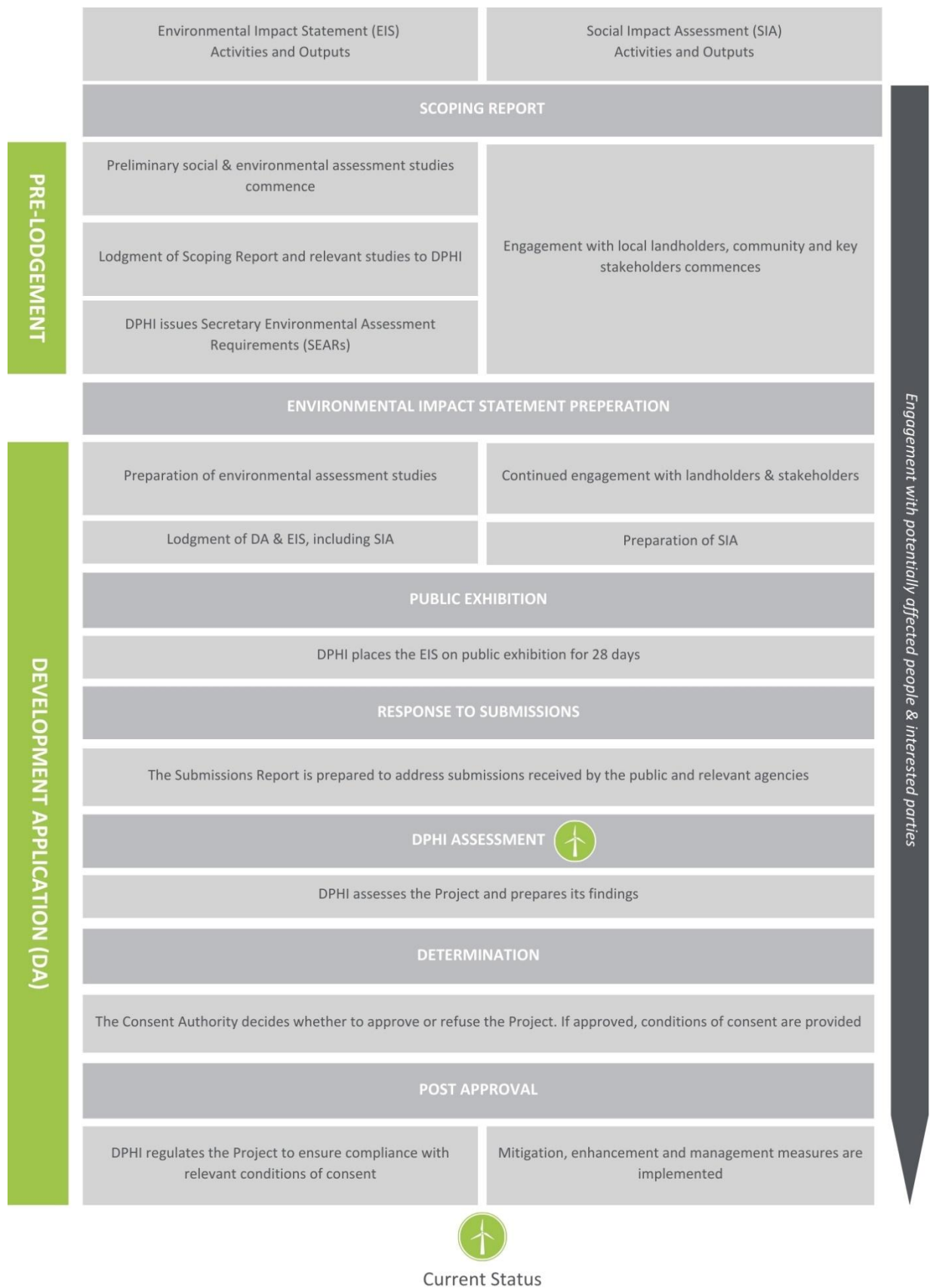


Figure A1-9: Planning and Approval Process

PROJECT JUSTIFICATION

The annual climate conference -Conference of Parties (COP) concluded in November 2024 with a clear message that in order to tackle global heating, there needs to be ‘incredible investment in climate projects and renewable energy’. A key component of this will be in the development of wind energy projects in Australia and across the globe. The annual Global Wind Report 2024 highlights the increasing momentum of wind energy worldwide, with more than 117 gigawatts (GW) of installed wind power occurring in 2023. Every MW of wind power installed is an important step towards a clean future, however as agreed at COP28 in 2023, nearly 200 governments agreed on the need to triple renewable energy capacity globally. That target highlights the efforts that still need to be made and demonstrate how the Project can be an important part in closing that capacity gap.

The Project plays a vital role in addressing the need for affordable energy to assist the transition away from fossil fuels and keep global heating in line with the Paris Agreement. The Project would produce between 1,379,700 MWh and 1,533,000 MWh per year, based on the average WTG capacity factor. This is enough clean energy to power the equivalent of 247,000 NSW households while offsetting nearly 1 million tonnes of CO_{2e} emissions per year. Not only would the Project be able to provide zero emissions energy to thousands of households, including within rural NSW where the Project is proposed, it can do so as one of the cheapest forms of energy on the market today as confirmed by the Commonwealth Scientific and Industrial Research Organisation (CSIRO 2021).

The Project is located in the Central West Orana REZ and will contribute to achieving the NSW Renewable Energy Targets.

In a time where the cost of living is affecting households across the board, the ability to generate affordable and zero emissions energy will provide a myriad of benefits to community members and stakeholders throughout NSW. It is expected that Australia needs to triple its energy capacity in the NEM by 2050. In order to do this and to be in line with Australia’s net zero emissions target, a number of wind and solar projects will be required. The Project presents an opportunity provide real world benefits to local communities while contributing to the essential task of decarbonising our energy grid and keeping global heating in line with 1.5°C.

This Submissions Report has been prepared to provide a detailed analysis of and response to the issues raised within submissions received on the project. It provides clarification on project details and specifics where necessary to ensure the Project can address community expectations and deliver a strong renewable energy asset to the NSW grid. Based on feedback received by multiple agencies, additional consultation has been undertaken and changes made to the Project Layout resulting in avoidance of further impacts. Additional measures to address issues raised by agencies and the community have been agreed to and, in the aggregate, the Project has sought to further reduce potential impacts from its development while committing to the delivery of clean, affordable, renewable energy.

The Project is set to provide a variety of benefits should it be approved, from the injection of millions of dollars into both the local economy and wider communities to the provision of hundreds of construction and industry jobs to providing additional income to associated landowners which will provide security during times of environmental hardship such as drought. The Project would not simply be an energy generator, it would be a public good that is capable of delivering real world benefits across the board.

Impacts across a range of factors are unavoidable when developing any large-scale infrastructure project, and wind farms are no different. The Project is not without its environmental and social impacts; however, those impacts have been minimised at every possible juncture. Where impacts have been identified and predicted to occur, the Proponent has committed to management, mitigation and offset measures to minimise or avoid those impacts.

Underlying the entire process, the implementation of best practices to avoid potential environmental and social impacts associated with the Project have been prioritised. While WTGs can strike an imposing figure, they benefit from relatively small footprints. This is in stark contrast to the wide reaching and extracting nature of fossil fuels

like coal which require the destruction of large swathes of land and habitat in order to then be burned further contribute to climate change and habitat loss. Not only would the Project have a limited physical impact on the landscape, made even smaller through response to feedback and general project design, but it will also offset the emissions of the entire project within 6 to 9 months based on life cycle assessments. This is in stark contrast to fossil fuel projects which by the very nature of their existence and extraction will continue to emit large amounts of CO₂ and further exacerbate climate change.

The Proponent has committed to making every effort possible to reduce impacts from the Project while promoting a range of benefits. These efforts and benefits would work in tandem as a result of the Burrendong Wind Farm being constructed.

The Submissions Report provides a further updated justification of the Project that takes into consideration the associated environmental and social impacts of the Project, the continued suitability of the site and to assist DPHI and the IPC to determine whether the project is within the public interest. While the Project will have a wide range of benefits, the EIS and subsequent Amendment report has identified the six (6) key benefits of the Project as outlined in Figure A1-10.



Figure A1-10: Key Project Benefits

1. Introduction

1.1. Overview

Burrendong Wind Farm Pty Ltd (the Proponent) proposes to develop the Burrendong Wind Farm (the Project) to provide a reliable and affordable source of energy for the people of New South Wales (NSW). The Project will contribute to reducing greenhouse gas (GHG) emissions by up to 900,000 tonnes of carbon dioxide equivalent emissions (CO₂e) associated with energy generation and provide ongoing economic benefits to the region.

Burrendong Wind Farm Pty Ltd is the Proponent, a wholly owned subsidiary of Ark Energy Corporation Pty Ltd (Ark Energy).

The Project is proposed to be located within the traditional lands of the Wiradjuri Aboriginal Nation. Its location spans the jurisdictions of two local Councils, being the Dubbo Regional Council (DRC) Local Government Area (LGA) and the Mid-Western Regional Council (MWRC) LGA in the suburbs of Yarrabin and Mumbil. The Project Site is located 30 km west of Mudgee, predominantly around the Yarrabin area, within the Mudgee Local Land Services (LLS) region and the Central-West Orana (CWO) Renewable Energy Zone (REZ) (Figure 1-1). It borders Lake Burrendong on the western side and is located on predominantly privately owned land used for agricultural purposes.

The Environmental Impact Statement (EIS) for the Project was placed on public exhibition by the NSW Department of Planning, Housing, and Infrastructure (DPHI) from 16 November 2023 to 20 December 2023. During public exhibition 256 submissions were received. This included 15 government agency/local government submissions and 241 community submissions. The 241 submissions received from the community included 231 submissions objecting to the Project, six (6) submissions in support and four (4) comments. A full analysis of the submissions is provided in Section 2.

In correspondence dated 21 December 2023, DPHI requested that the Proponent formally respond to issues raised in the submissions. This Submissions Report has been prepared by Eco Logical Australia (ELA) on behalf of the Proponent in consideration of the *State Significant Development Guidelines – Preparing a Submissions Report* (DPHI 2024a) to address the key issues raised in the submissions.

1.2. Overview of the Project

The Project consists of the installation, operation, maintenance, and decommissioning of up to 70 Wind Turbine Generators (WTG), electrical infrastructure, ancillary infrastructure, public road upgrades and access tracks and temporary facilities (including a Temporary Workers Accommodation Facility (TWAF)). The Project is designed to accommodate WTGs up to 250 m in height, with a nameplate capacity of approximately 6 - 8 megawatts (MW). On these terms, subject to Development Consent and market changes, the Project is estimated to have an installed generating capacity of approximately 400 - 500 MW. The Project would connect to the existing Transgrid 330 kV transmission line to the west of the Project Site, on the western side of Lake Burrendong.

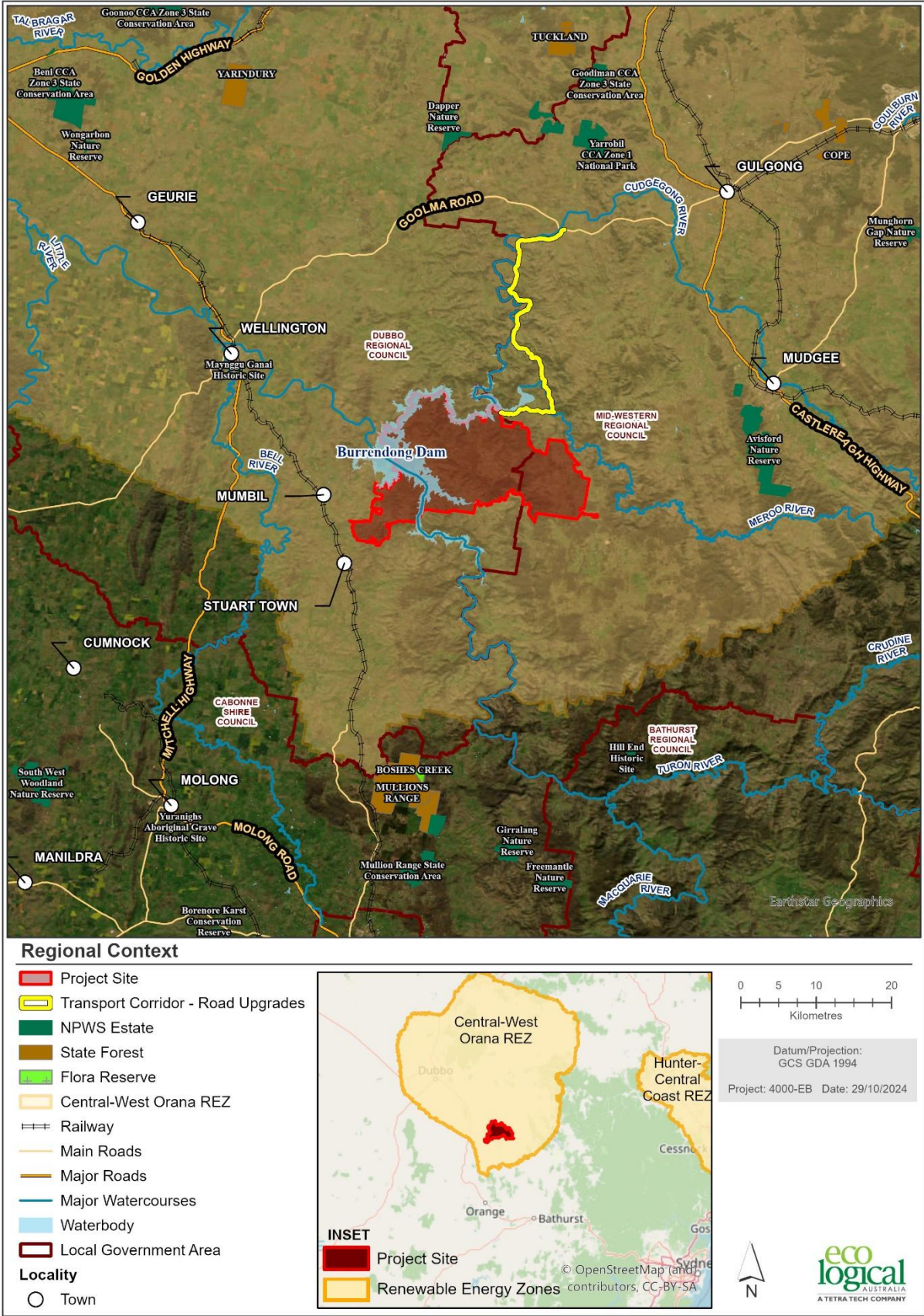


Figure 1-1: Project Site Regional Context

2. Analysis of Submissions

2.1. Submissions Summary

During public exhibition 256 submissions were received. This included 14 agency submissions, two (2) Local Government submissions and 241 individual and organisation submissions (Figure 2-1). A Submissions Register is provided in Appendix A.

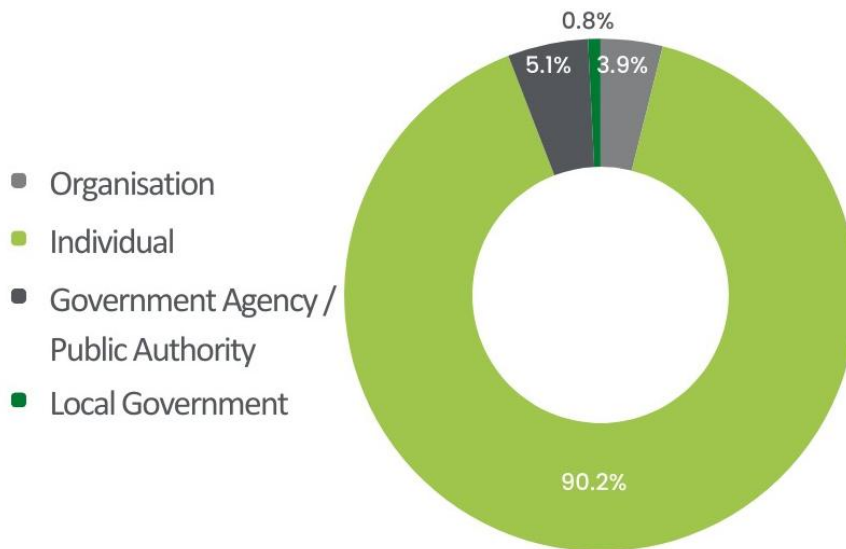


Figure 2-1: Summary of Submissions Received

2.1.1. Agency Submissions

As outlined above, 16 government agencies submissions were received from the following:

- Biodiversity, Conservation and Science Group (BCS), now Conservation Programs, Heritage and Regulation Group (CPHR)
- Civil Aviation Safety Authority (CASA)
- Crown Lands
- Department of Planning and Environment (DPE) – Hazards
- DPE – Water
- Department of Primary Industries (DPI) – Agriculture
- DPI – Fisheries
- Environment Protection Authority (EPA)
- Fire and Rescue NSW (FRNSW)
- Heritage NSW (Aboriginal Heritage)
- Heritage NSW (Historic Heritage)
- Mining, Exploration and Geoscience (MEG) NSW
- NSW Rural Fire Service (RFS)
- Transport for NSW (TfNSW)
- WaterNSW
- UGL Regional Linx.

No State or Commonwealth government agencies/authorities objected to the Project. Additionally, further information or clarification of certain aspects regarding relevant assessments have been requested by some agencies, while others provided no comment. The content of the submissions is discussed further in Section 4.1.

2.1.2. Local Government Submissions

Submissions were received from both Local Councils, being:

- DRC
- MWRC.

MWRC has objected to the Project, while DRC has provided a comment that was neither in support of nor objecting to the Project but rather raised several factors regarding the Project including the structure of the proposed planning agreement.

2.1.3. Public Submissions

Of the 241 submissions from the public:

- 222 individuals and 9 organisations objected to the Project (95.9%)
- 6 individuals were in support of the Project (2.5%)
- 3 individuals and 1 organisation provided comments only (1.7%).

The submissions were analysed based on proximity to the Project to determine the level of interest across the following three categories:

- **Local:** approximately 5 km from the Project Site
- **Regional:** between approximately 5 – 100 km from the Project Site
- **Broader Community:** greater than approximately 100 km from the Project Site.

Of the 241 public submissions received, inclusive of objections, support and comment only (

Figure 2-2):

- 28 were received in the local area (11.6%)
- 80 in the regional area (33.2%)
- 133 from the broader community (55.2%).

The analysis involved the compilation of suburbs associated with individual submissions published on the Major Projects website and confirming their relative location to a 5 km radius of the Project Site (Figure 2-3). Therefore, some residences listed as local may in fact be greater than 5 km from the Project Site. The analysis of submissions by suburbs above is therefore conservative in its approach as further interrogation is not possible with the data available. Of the 28 submissions made within the Local Area, 23 were in Yarrabin, three (3) in Worlds End and two (2) in Twelve Mile.

Table 2-1 provides a breakdown of submissions made by both individuals and organisations outlining those in support, objecting to or commenting on the Project.

Table 2-1: Breakdown of submissions made by individuals and organisations.

Group	Objection	Support	Comment
Individuals	222 (92%)	6 (2.6%)	3 (1.3%)
Organisation	9 (3.7%)	0 (0%)	1 (0.4%)

Group	Objection	Support	Comment
Total	231 (95.7%)	6 (2.6%)	4 (1.7%)

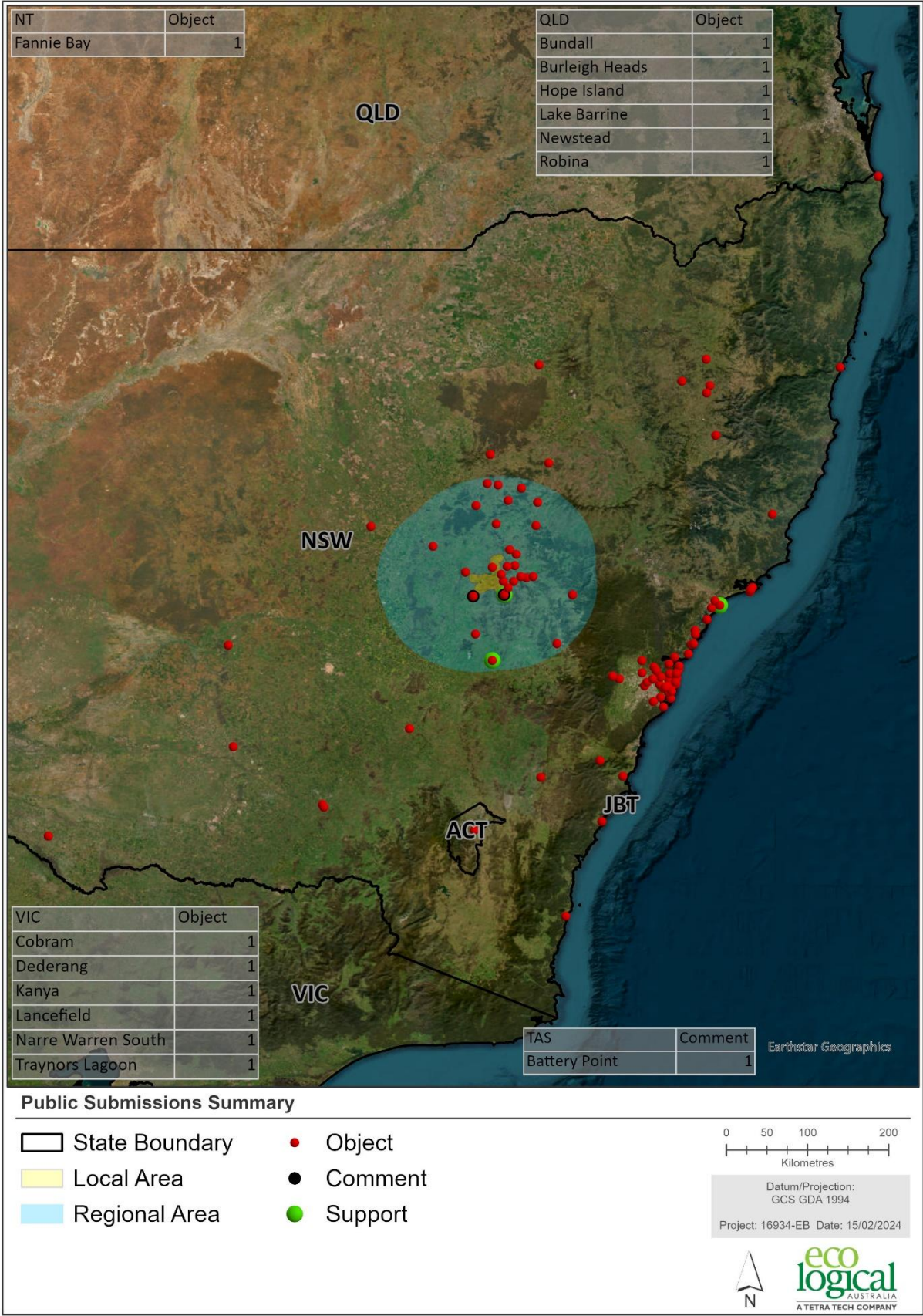


Figure 2-2: Geographic Distribution of Submissions by Type

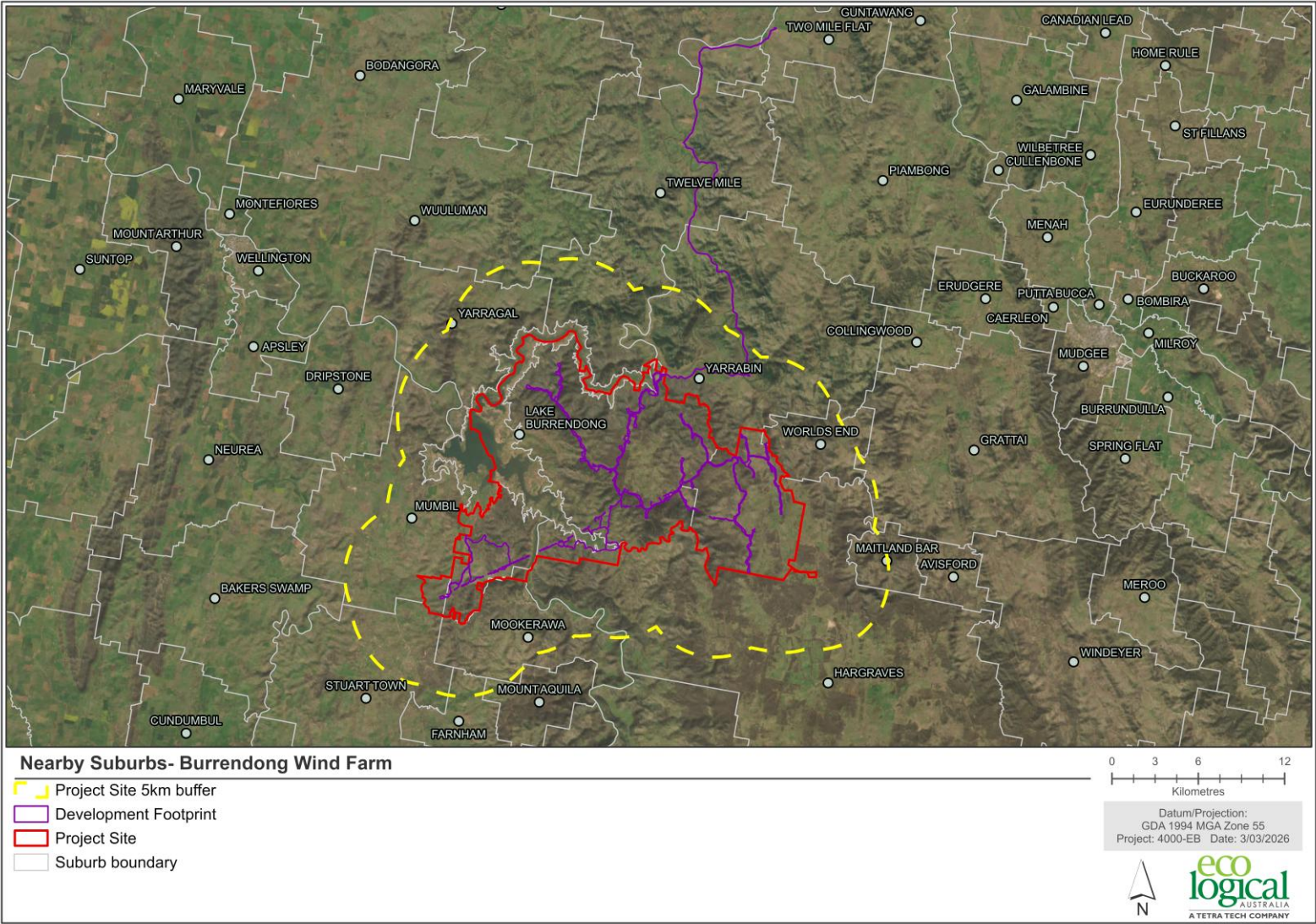


Figure 2-3: Local Suburbs within 5 km Radius of the Project Site

2.1.3.1. Objecting Submissions

The 231 objections received made up of 222 individuals and nine (9) organisations. The analysis of the submissions undertaken showed that 39 (17%) objections were from the local area, 46 (20%) were from the regional area (between 5 km and 100 km) and 146 (63%) were from the broader community of greater than 100 km (Figure 2-4).

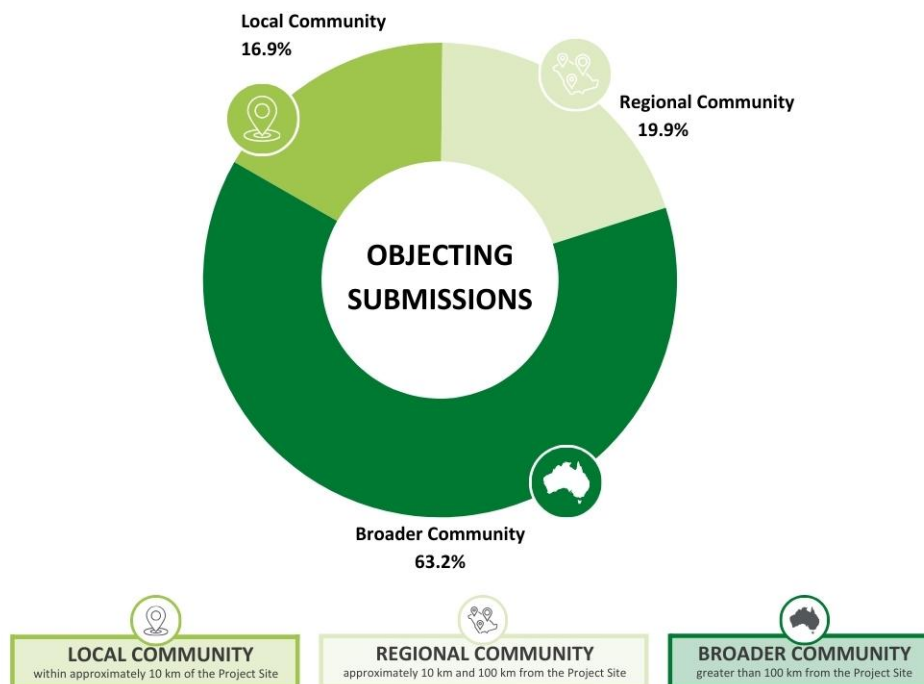


Figure 2-4: Geographic distribution of objecting submissions

Of the objections received, the vast majority objected on the basis of perceived impacts to environmental, economic and social factors (198 submissions) as shown in Figure 2-5. This was followed by 64 submissions objecting regarding the justification for the Project (e.g. renewable energy or climate change), 40 objecting to the location and/or Proponent, 32 objections to the consultation and/or compensation of the Project. Six (6) submissions were made objecting to the Project due to issues outside the scope of the Project, such as insurance and anti-slavery concerns. It is noted that several issues were raised in various submissions, therefore the number of issues raised is larger than the number of submissions received.

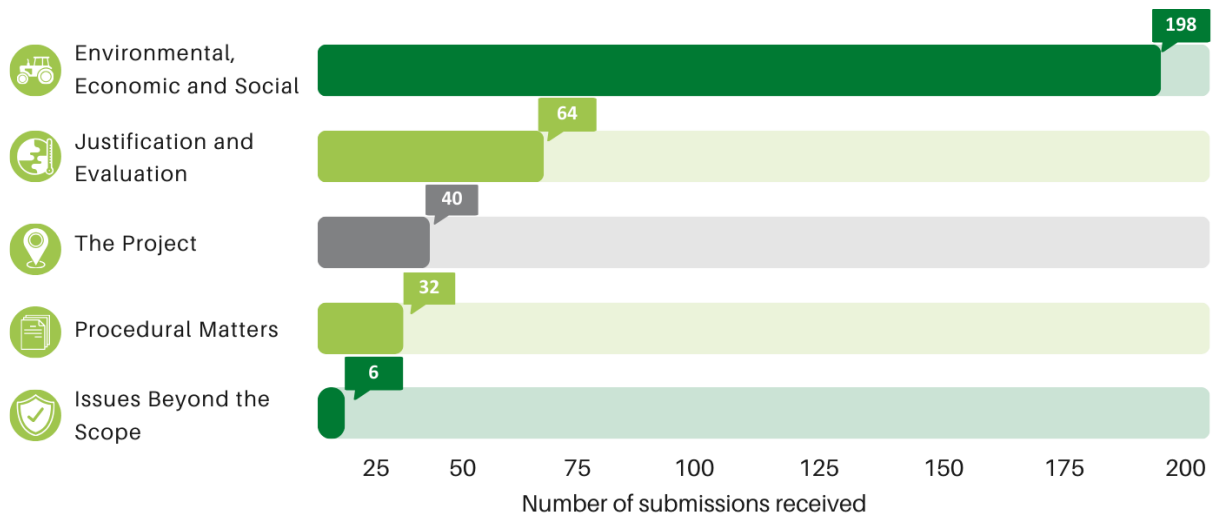


Figure 2-5: Key issues raised in objecting submissions

2.1.3.2. Supporting Submissions

There was a total of six (6) submissions received in support of the Project by individuals and organisations. The analysis undertaken showed that the submissions received were evenly distributed between the regional area (5 km – 100 km) and the broader community (greater than 100 km), being three (3) submissions (50%) regionally and three (3) submissions (50%) more broadly. It is noted however that the three (3) submissions classed as within the regional area are located within the suburb of Hargraves, within approximately 15 – 20 km of the Project Site, demonstrating support from individuals in proximity to the site. There were no supporting submissions from the local community (Figure 2-6).



Figure 2-6: Geographic distribution of supporting submissions

2.1.3.3. Comment Submissions

In total, four (4) submissions are categorised as comments were received from individuals and organisations. Three (3) of the submissions were from the regional area, although within approximately 15 km of the Project, and one (1) was from the broader community (greater than 100 km).

2.2. Categorisation of Submissions

As part of this Submissions Report, an analysis of the submissions has been completed to develop a greater understanding of the key issues raised in relation to the Project. Objections and supporting submissions were each analysed separately due to the distinct nature of themes in the submissions.

In accordance with the *State Significant Development Guidelines – Preparing a Submissions Report* (DPHI 2024a), issues have been categorised into the following five broad groups:

- **The Project** (e.g. the Project Site, the physical layout and design, key uses and activities, timing)
- **Procedural matters** (e.g. the level or quality of engagement undertaken, compliance with the Secretary's Environmental Assessment Requirements (SEARs), and identification of relevant statutory requirements)
- **Economic, environmental and social impacts of the Project** (e.g. amenity, air, biodiversity, heritage, traffic, noise, etc.)
- **Justification and evaluation of the Project as a whole** (e.g. consistency with relevant Government plans, policies and guidelines)
- **Issues beyond the scope of the Project or not relevant** (e.g. broader policy issues, insurance, etc.).

These broad categories have further been divided into themes and sub-themes to provide greater detail and definition of the issues raised. Further details on the categorisation of issues are provided in the following sections.

2.2.1. Objecting Submissions

As the environmental, economic, and social impacts covered the widest range of factors, they were the most frequently raised category of objecting submissions received by a significant margin, accounting for 198 submissions (Figure 2-7). The top five concerns raised regarded *landscape and visual impacts* (137 references), *biodiversity impacts* (128 references), *health and wellbeing* (52 references), *noise and vibration impacts* (45 references) and *economic impacts* (43 references).

Issues relating to the justification of the Project were the second most frequently raised, followed by the Project itself, procedural matters, and issues beyond the scope of the Project.

It is noted that several submissions raised issues across a number of categories, as well as multiple themes and sub-themes within each category.

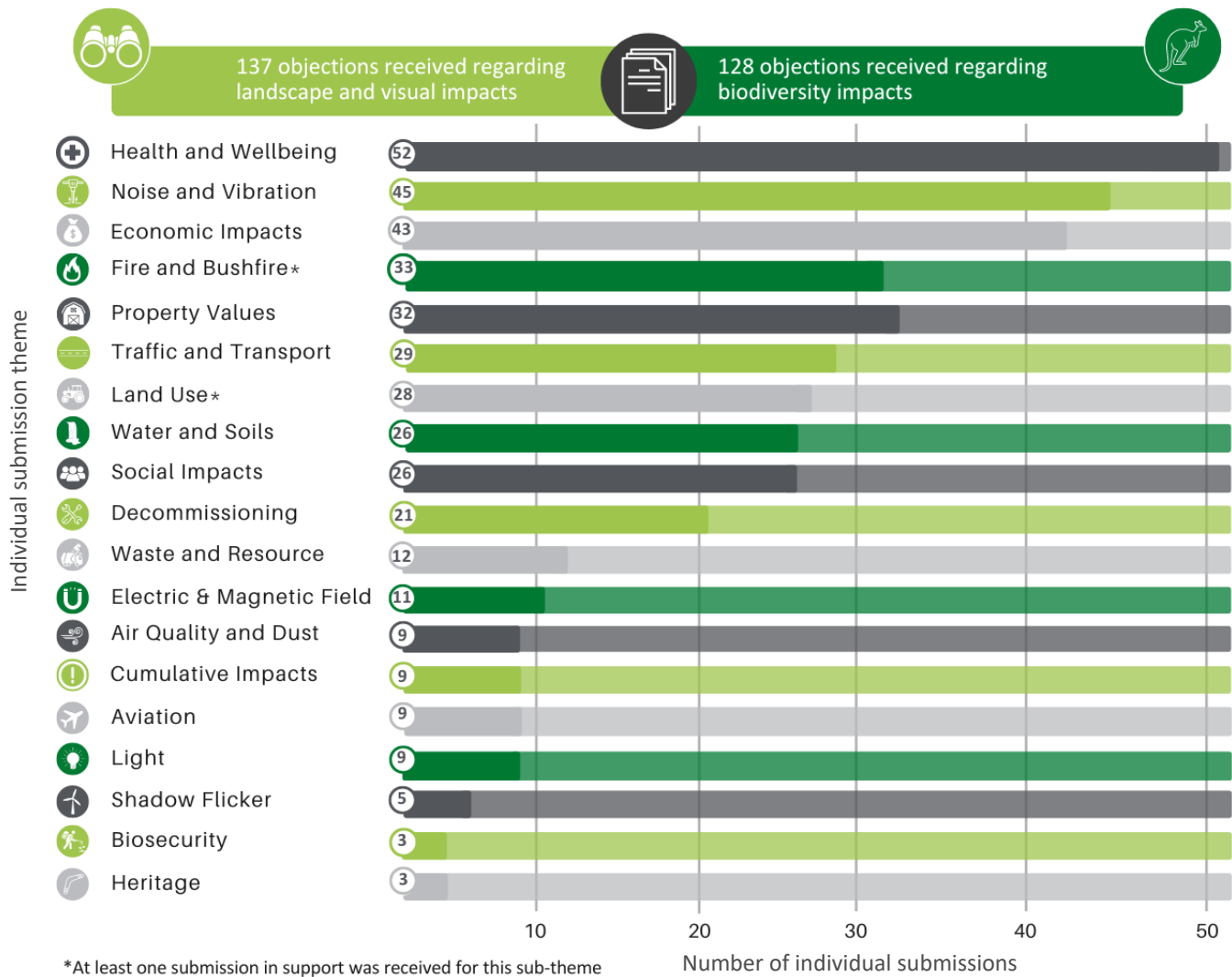


Figure 2-7: Submissions Objecting to the Project Based on the Subtheme of the Submission

2.2.1.1. Environmental, economic and social

Within the environmental, economic and social theme, 21 key sub-themes were identified as part of the objecting submissions (Table 2-2). The two main sub-themes were based on visual (137 mentions) and biodiversity (128 mentions) impacts. The remaining 19 sub-themes varied from as many as 52 to three (3) objections.

Table 2-2: Number of Submissions in Support or Objection to Identified Environmental, Social and Economic Sub Themes.

Sub theme identified	Number of associated submissions	
	Objection	Support
Landscape and Visual	137	0
Biodiversity	128	0
Health and Wellbeing	52	0
Noise and Vibration	45	0
Economic Impacts	43	1
Fire and Bushfire	32	1
Property Values	32	0

Sub theme identified	Number of associated submissions	
	Objection	Support
Traffic and Transport	29	0
Land Use	27	1
Water and Soils	26	0
Social Impacts	26	0
Decommissioning	21	0
Waste and Resource Use	12	0
Electric and Magnetic Fields	11	0
Air Quality and Dust	9	0
Cumulative Impacts	9	0
Aviation	9	0
Light	9	0
Shadow Flicker	5	0
Heritage	3	0
Biosecurity	3	0

Note that a number of submissions contained references to multiple sub-themes and, therefore, the number of submissions relating to sub-themes is not representative of the overall number of submissions received (241 in total, 231 objecting, six (6) in support, and four (4) comments).

2.2.1.2. Justification of the Project

The ability, and therefore justification, of the Project to positively contribute to key environmental factors were raised in 68 submissions. The concerns included the impact of renewable energy (64 submissions) and climate change (10 submissions).

2.2.1.3. The Project

There were 42 submissions which raised the issue of the Project, specifically regarding the Proponent and the location of the Project.

2.2.1.4. Procedural Matters

The key issues raised by the objections to procedural matters of the Project regarded the consultation undertaken (29 submissions) and the compensation to be provided (eight (8) mentions) as a result of the Project.

2.2.1.5. Issues beyond the scope of the Project

This category relates to broader policy issues or issues that are not directly related to the merits of the Project or within the Proponents ability to alter. The main theme raised under this category was in relation to insurance associated with the operation of a wind farm in rural areas and human rights (anti-slavery).

2.2.2. Supporting Submissions

The Project received six (6) submissions in support of its development. The key themes of these submissions related to:

- Renewable energy and action on climate change
 - Three (3) of the submissions in support of the Project spoke of the need to address climate change, develop renewable energy to harness zero emissions energy generation and to “strike while the iron is hot” to allow the Project to support transition of the energy grid away from polluting fossil fuels.
- Environmental benefits
 - A landholder and business owner in proximity to the Project highlighted their RFS experience and the potential firefighting capabilities of project infrastructure, such as additional access tracks within the Project Site.
- Economic benefits
 - Multiple submissions from both individuals and a local business discussed the likely economic benefits of the Project both directly and indirectly. This included a perceived reduction in the cost of energy as a result of the Project, through to income derived from the Project allowing farming businesses to afford stock feed during times of drought.

2.2.3. Comment Submissions

Four (4) community submissions (both individual and organisation) were received as comments. These submissions did not support or object to the Project. The submissions address issues relating to environmental, economic and social issues.

3. Actions Taken Since Exhibition

Following the exhibition of the EIS for the Project, actions have been taken to address various issues raised in the submissions. Details relating to additional actions undertaken since the exhibition of the Project are provided in this section and primarily focus on:

- Further engagement with agencies, councils and the community (Section 3.1)
- Amendments to the Project Description and Layout to address issues raised in the submissions (Section 3.2 and Amendment Report (ELA 2026a))
- Further assessment for Project Amendments and key issues raised in the submissions (Section 3.3 and Amendment Report (ELA 2026a)).

3.1. Ongoing Stakeholder Engagement

The Proponent acknowledges the issues and concerns raised by the community and other stakeholders including councils and other government agencies. Where feasible, this feedback has been incorporated into the updated environmental assessments and associated changes with the Project. The Proponent is committed to ongoing engagement with all Project stakeholders as the Project moves through the assessment, pre-construction, construction and operation phases. The Proponent has maintained consultation in various forms since the start of the EIS process and beyond. Key consultation undertaken since the exhibition of the EIS is provided Table 3-1.

Table 3-1: Ongoing Consultation Since Exhibition of EIS

Stakeholder/Meeting/email	Topic	Date
Yarrabin Road landowners meeting	Proposed road upgrades	7 December 2023
Community Consultative Committee meeting	Project information, planning application process and status	8 December 2023
Public information session	Project information, planning application process and status	8 December 2023
DPHI meeting	Additional information requirements	13 February 2024
Australian Energy Infrastructure Commissioner	Feedback received by the Commissioner and details of Proponent response	22 February 2024
MWRC meeting	Issues raised in submissions	27 March 2024
Heritage NSW meeting	Clarification on additional information to be included in heritage assessment	15 April 2024
BCS meeting	Additional site surveys required and assessment methodologies	24 April 2024
BCS letter response	Additional information required in BDAR	22 May 2024
Yarrabin Road Landowner group – follow up meeting	Impacts of road upgrades on adjoining properties	29 May 2024
Consultation with owner of approved farm stay accommodation	Site visit and visual impact assessment at farm stay location	Late May 2024

Stakeholder/Meeting/email	Topic	Date
Site visit with BCS	Familiarisation with wind farm layout and site biodiversity	30 May 2024
BCS letter response	Further additional assessments and information required in BDAR	20 June 2024
DPHI and BCS meeting	Clarification on information requests	5 July 2024
TfNSW meeting	Clarification on submission and outstanding actions	25 July 2024
Workshop with BCS	Site surveys requirements	31 July 2024
DPHI letter response	Request for Additional Information	19 December 2024
DPHI letter response	Request for Additional Information	10 March 2025
DPHI	Feedback on proposed WTG risk assessment methodology	14 May 2025
MWRC Meeting	Proposed MOU and process for re-alignment of public roads. Council expectation for planning agreement terms	20 May 2025
BOS Helpdesk (CPHR)	Correspondence - Key's Matchstick Grasshopper and Pink-tailed Legless Lizard. Clarification on survey methodology and timing	23 May 2025
CPHR	Correspondence - proposed additional and appropriate measures for BGW SAIL impacts	12 June 2025
CPHR Meeting	Discussion of potential BGW SAIL, amended Project and bird and bat activity analysis	1 July 2025
TfNSW	Discuss port to REZ upgrades, inclusions and exclusions	13 August 2025
MWRC meeting	MoU and VPA terms	19 August 2025
Dubbo Council	VPA, TWAF, general update	20 August 2025
DPHI meeting	Update on RtS progress, and MWRC MoU	20 August 2025
DPHI letter	Reject RtS & Amendment Reports - Request for Additional Information	13 October 2025
MWRC	Project update and status Access Road update – Goolma/Twelve Mile intersection, Twelve Mile, Yarrabin and Burrendong Dam Road. MOU VPA	20 October 2025
MWRC	Onsite discussion of road upgrades Goolma/Twelve Mile intersection, Twelve Mile, Yarrabin and Burrendong Dam Road Inspected areas that would require change from existing road.	13 November 2025
Squadron – meeting with Uungula project team	OSOM road upgrades, Mitchel HWY and Goolma Rd intersection (Wellington) Squadron confirmed that	17 December 2025

Stakeholder/Meeting/email	Topic	Date
	designs were being finalised with TfNSW for the intersection and indicated that works were intended to be complete in 2026	
TfNSW email	Ark provided strategic design for the strategic design of Goolma Rd/Twelve Mile Road intersection	19 December 2025
MWRC	Council briefing before council monthly meeting to indorse the MoU between the parties	19 November 2025
ACEN Pheonix PHES project team	Common public road upgrades	22 December 2025
Squadron – Uungula Wind Farm	Squadron provided Ark the final draft intersection design for Mitchell Hwy/Goolma Road for reference	15 January 2025
Project Newsletter - Stakeholder mailing list and project website	Ark provided project update	10 Feb 2026
ACEN Pheonix Pumped Hydro project team	Ark provided a Briefing re MWRC MoU approach, and process	12 Feb 2026
DPHI	Landscape and Visual	16 February 2026
MWRC & ACEN	Access Road update – Goolma/Twelve Mile intersection, Twelve Mile, Yarrabin and Burrendong Dam Road	19 February 2026
Dubbo Regional Council	VPA discussion	20 February 2026
Squadron – Uungula Wind Farm	Email from Squadron confirmed final intersection design is consistent with that that provided on the 15 th of January 2026	2 March 2026
Twelve Mile Landholders	Consultation with registered proprietors of land directly impacted by road upgrades via road reserve regularisation and changes including: In person valuations with qualified independent valuer regarding any road reserve changes In person meetings to discuss impacts Surveys and road change inspections Meeting with Ark Energy civil engineers to discuss construction matters, drainage and other matters. Each landholder has had a minimum of three direct interactions (in person meetings or meetings over the phone/teams) and a minimum of 3 additional touchpoints via email or text. Some landholders have had up to 5 in person engagements of approximately 1 hour minimum.	08,10, 17, 22-25, September 2025 08-10, 13-16, 20, and 27 October 2025 05-08, and 21 November 2025 01, 08-12, and 17 December 2025 13-15, 20, 27 and 31 January 2026 02-06 and 18-20 February 2026 02, 03, 04, and 05 March 2026

Stakeholder/Meeting/email	Topic	Date
Yarrabin Road Landholders	Consultation with registered proprietors of land directly impacted by road upgrades via road reserve regularisation and changes including:	03, 08, 10, 22-26 September 2025
	In person valuations with qualified independent valuer regarding any road reserve changes	01, 08-10, 13-16, 21 and 27 October 2025
	In person meetings to discuss impacts	05-08, 11, and 27 November 2025
	Surveys and road change inspections	02, 08-10, 18, and December 2025
	Meeting with Ark Energy civil engineers to discuss construction matters, drainage and other matters.	13-15, 23 and 30 January 2026
	Each landholder has had a minimum of three direct interactions (in person meetings or meetings over the phone/teams) and a minimum of 3 additional touchpoints via email or text.	02-06, 10 and 18-20 February 2026
	Some landholders have had up to 5 in person engagements of approximately 1 hour minimum.	02-05 March 2026
Burrendong Dam Road Landholders	Consultation with registered proprietors of land directly impacted by road upgrades via road reserve regularisation and changes including:	08, 22-25 September 2025
	In person valuations with qualified independent valuer regarding any road reserve changes	08-10, 15-16, 20-21, and 27 October 2025
	In person meetings to discuss impacts	05-08, 13 and 29 November 2025
	Surveys and road change inspections	08-11 December 2025
	Meeting with Ark Energy civil engineers to discuss construction matters, drainage and other matters.	13-16 and 27 January 2026
	Each landholder has had a minimum of three direct interactions (in person meetings or meetings over the phone/teams) and a minimum of 3 additional touchpoints via email or text.	02-06, 09, 13, 18-20 and 26 February 2026
	Some landholders have had up to 5 in person engagements of approximately 1 hour minimum.	02-05 March 2026

3.2. Amendments to the Project

3.2.1. Project Site Refinement

As outlined in the EIS, during the design phase of the Project, the Proponent considered feedback from local landholders, community, and other stakeholders along with the environmental, cultural and social values of the locality. This was undertaken to better understand and pre-emptively minimise and mitigate potential environmental and social impacts that may arise from the Project.

To better inform the layout of the Project in the EIS, discussions with landowners and neighbours were undertaken with the layout undergoing numerous iterations and design alterations. Where landowners did not wish to be involved in the Project, these areas were removed from the Project layout and a buffer area applied. Following the submission of the EIS, Project refinement continued with multiple discussions and planning events to consider ways that the Proponent could address concerns raised while still effectively delivering a viable Project. This

included discussions with ecologists and archaeologists to further reduce potential impacts of the Project infrastructure on identified biodiversity and heritage values within the Project Site.

Given the significant wind energy potential of the Lake Burrendong area, the Project Site was selected to capitalise on that abundance and propose a wind farm with limited environmental and social constraints, as identified during the scoping report phase. Throughout the Project lifecycle to date, including since the submission of the EIS, the Proponent has undertaken a design hierarchy principle of avoid, minimise, mitigate, offset, as described below:

- *Avoid* – in the first instance, all efforts were made to avoid potential environmental, cultural and social impacts from occurring
- *Minimise* – where potential impacts were identified and could not be avoided, design principles sought to minimise their effects as far as feasible
- *Mitigate* – mitigation strategies were identified and will be implemented at the appropriate stages to manage the extent and severity of the remaining impacts should they occur
- *Offset* – environmental offsets are only used after all other efforts to avoid, minimise and mitigate impacts have been exhausted.

More specifically, the Proponent has adopted the following principles to reduce potential impacts of the Project:

- *Minimise vegetation clearing* – Areas of high conservation value and/or key native vegetation strategically avoided from the beginning of the Project design. Regional vegetation and soil capability mapping was integrated into the Proponent's model for WTG placement to focus on avoiding high and medium value vegetation, woodland areas, highly capable land and areas of Threatened Ecological Communities (TEC). Following successive biodiversity surveys and fieldwork, a more detailed understanding of the biodiversity values of the Project Site became available. This in turn helped to refine design adjustments that allowed the prioritisation of disturbance minimisation
- *Micro-siting allowance* – The proposed locations of WTGs have been chosen to allow the WTG foundations to be micro-sited within a Development Corridor. This will allow greater flexibility to avoid any unforeseen biodiversity and cultural constraints that may arise during the detailed design and construction phase
- *Minimise land disturbance* – The design of Project footprints for WTG hardstands, site compounds, substations and other ancillary infrastructure was limited to the minimum area required. In tandem with the ability to micro-site infrastructure, land disturbances are minimised and focused on areas that will provide the lowest impacts
- *Riparian protections* – The protection of key riparian zones, particularly higher order (as per Strahler Stream Ordering (SSO)) streams were excluded from the developable area (noting that stream crossings for access are required) and detailed mitigation and monitoring measures were put in place
- *Protection of cultural heritage values* – Understanding and respecting the cultural heritage values within the Project Site to Wiradjuri People and other First Nations people with a connection to the land has been an important element of the Project design process from the outset. Through the identification and evaluation of cultural heritage values within the Project Site, in consultation with Registered Aboriginal Parties, values have been identified and avoided wherever possible
- *Minimise direct and indirect impacts* – Wherever possible, the Project has been designed to locate infrastructure away from nearby residences, adjoining properties and other identified sensitive receivers
- *Flexible design approach* – The Project has been designed in an iterative process that has progressively responded to identified environmental, social and cultural impacts and constraints. This iterative process will continue throughout the detailed design phase of the Project
- *Project infrastructure site selection* – Wherever possible the Project has located infrastructure on land previously cleared or modified by past agricultural development, in consultation with landowners.

The evolution of the Project since the submission of the EIS (Figure 3-1) has included material impact minimisation steps in response to feedback received during discussions with stakeholders, and as knowledge of the Project Site and constraints have increased. Following the exhibition of the EIS, the Proponent has made additional design modifications in response to the consideration of stakeholder feedback, advice from technical consultants and additional biodiversity constraints mapping, including:

- Change in Project Site boundary that incorporates removal of subject land due to removal of the northern powerline option, in part to avoid potential impacts to identified Aboriginal heritage sites or valued areas following consultation with Aboriginal Stakeholders and Registered Aboriginal Parties (RAPs)
- Change in Development Corridor:
 - Realignment of a section of access track to reduce impacts to Box Gum Woodland that was classified in 'good' condition
 - Realignment of a section of access track to WTG 49 to avoid impacts to Aboriginal Sites
 - Addition of an alternate access track (option A) at the Project Site entrance through the Cudgegong River Holiday Park to reduce impacts to native vegetation. During detailed design either option A or option B will be selected
 - Realignment of the Project powerline to avoid proposed Yarrabin Phoenix Pumped Hydro Energy Storage (PHES) infrastructure and more detailed design of power line power poles to reduce impacts to TECs, associated impact areas and powerline construction access tracks
 - Expansion of the area around the construction compound to include a TWAF.
 - Adjustments to public road upgrade Transport Corridor:
 - Addition of Goolma Road and Twelve Mile Road intersection upgrade
 - Adjustment on to a section of Twelve Mile Road to reduce impact on private land
 - Adjustment to Yarrabin Road and Burrendong Dam Road intersection to avoid heritage impact
- Refinement of the 330kV powerline, resulting in the following changes:
 - reduction of the Development Footprint within the powerline easement disturbance area
 - the concept design of access tracks to enable the construction of the powerline and power poles, utilising existing farm tracks as much as possible to minimise the need for clearing of vegetation.

It is noted that the above changes represent a reduction in impacts from those assessed in the EIS and are not indicative of new impacts.

Overall, as a result of these changes, there has been a reduction in both the Development Corridor and Development Footprint for the Project. The amended Project Layout is shown in Figure 3-2 and summarised Table 3-2, and further details are provided in Section 3 of the Amendment Report (ELA 2026a). A consolidated Project Description is provided in Appendix A.1 of the Amendment Report (ELA 2026a).

Table 3-2: Reduction of Project areas from EIS to submissions report

Project Element	EIS (ELA 2023a)	Amended	Reduction
Project Site	29,176 ha	27,086 ha	2,090 ha
Development Corridor	3,058 ha	1,322 ha	1,736 ha
Development Footprint (direct impact area within Development Corridor)	855 ha ²	730.73 ha	124 ha

² Windfarm, Southern Powerline, Yarrabin Road Upgrade

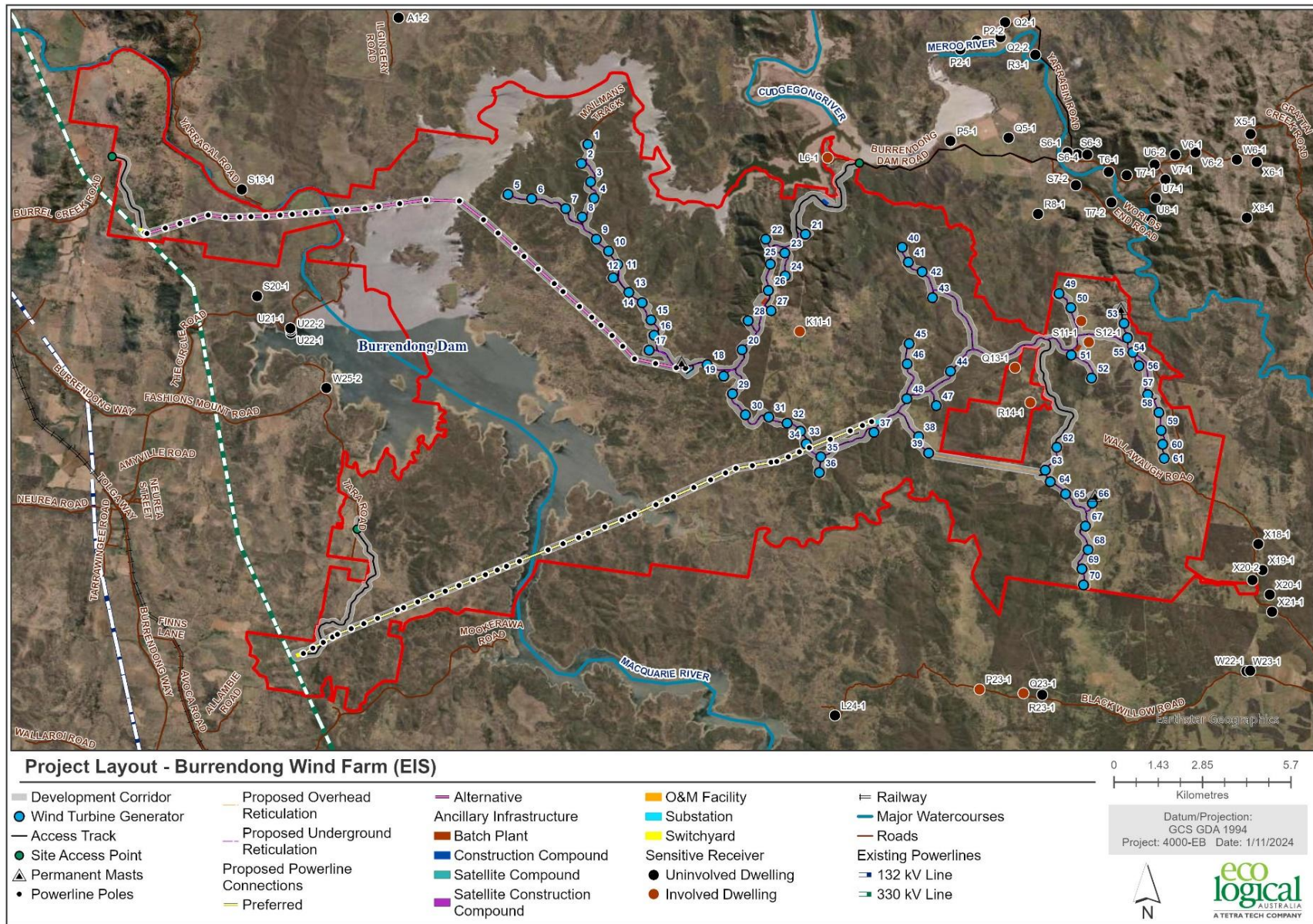


Figure 3-1: EIS Project Layout

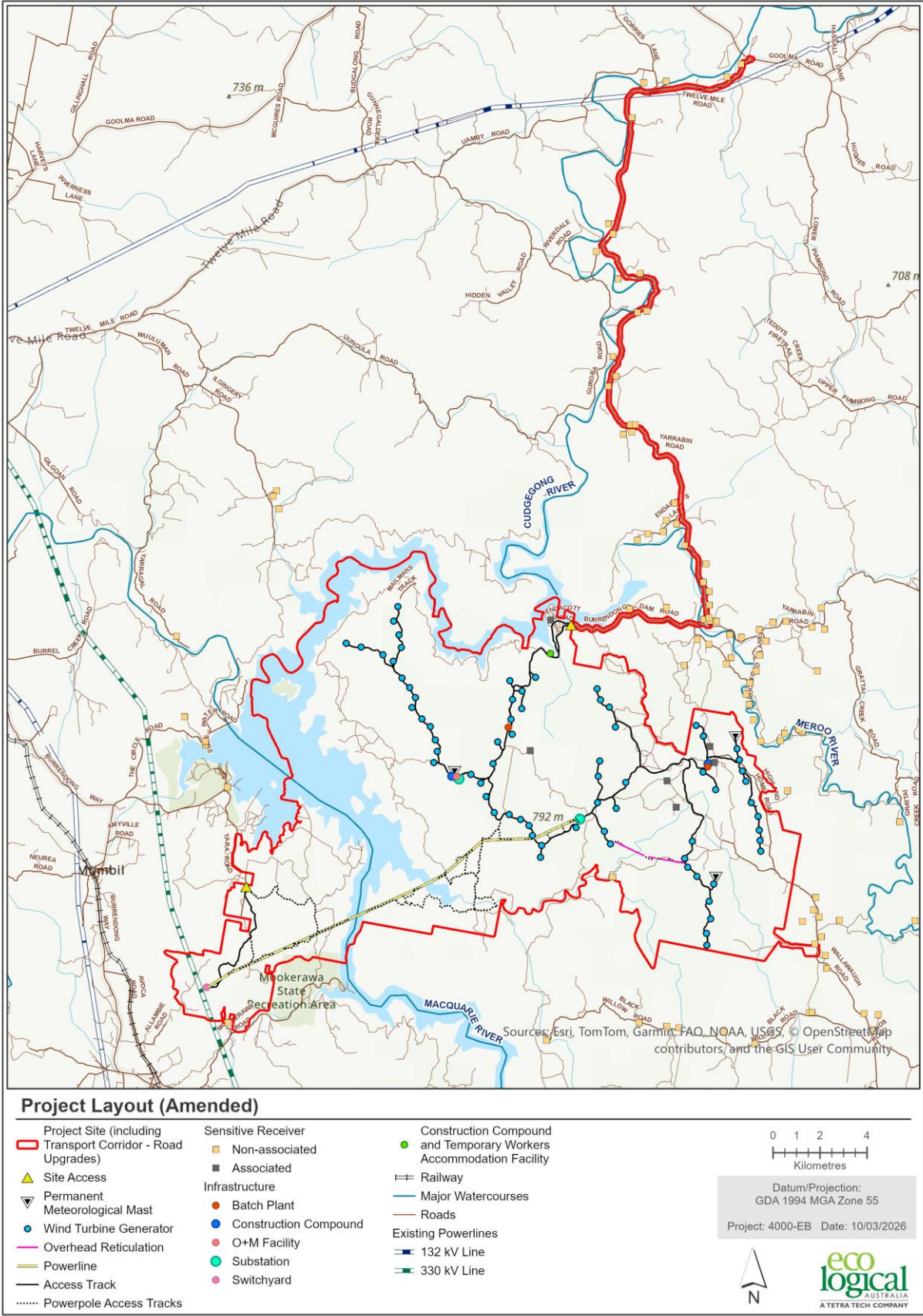


Figure 3-2: Amended Project Layout

3.2.2. Impacted Receivers assessed and status update

Receiver status update: there has been a change in the status of two dwellings (R14-1 and Q13-1) from “Non-Involved” to “Involved”, resulting from agreements being reached with the respective property owners. Additionally, two dwellings (P23-1 and Q23-1) have changed status from “Involved” to “Non-involved” following the termination of an agreement with the property (and dwelling) owner.

Receiver update: Since the EIS was exhibited, four additional dwellings (X20-2, X18-2, T23-1, and U24-1) have been identified and fully assessed. In addition, at the request of DPHI and in response to submissions, a further 19 potential dwellings and building locations have been assessed.

As a result of the changes in status and the inclusion of additional receivers, the LVIA Addendum (Moir Studio 2026), NVIA Addendum (MDA 2026) and Hazard and Risk – Blade Throw Assessment (Middleton 2026) have been updated accordingly (refer to Appendix D, Appendix E.2 and Appendix J of the Amendment Report (ELA 2026a)).

3.2.3. Accommodation and Employment

In response to submissions received regarding the construction workforce accommodation options, a TWAF has been incorporated into the previously assessed Development Footprint. A description of the TWAF and potential impacts has been included in Appendix A.2 of the Amendment Report (Barnson 2025; ELA 2026a).

Additionally, Ethos Urban have prepared a Construction Workforce Accommodation Strategy (CWAS), refer to Appendix Q of the Amendment Report (Ethos Urban 2024; ELA 2026a). It is anticipated that the Project will create 130 Full-Time Equivalent (FTE) jobs (on average per month) over the construction phase, spanning approximately 24 months. Actual workforce numbers will vary from month to month depending on the intensity of construction at the time. The Project’s peak period is estimated to last for four (4) weeks (i.e. above average number of on-site workers), with 250 FTE positions supported by on-site construction activities in the peak month. It is expected that 90% of workers will be non-local and will require accommodation.

It is therefore recommended to provide accommodation for 225 FTE workers, either onsite or off-site (within a 60-minute drivetime from the main access point). This approach would be beneficial to the Project and the community.

3.2.4. Additional Management and Mitigation Measures

The EIS provided a detailed suite of management and mitigation measures for the Project (Appendix D of the EIS (ELA 2023a)). In response to submissions received for the Project, additional management and mitigation measures have been proposed. Appendix C of the Amendment Report provides an updated summary of the additional measures proposed (ELA 2026a).

3.3. Further Assessment

The Project remains generally as described in Section 3 of the EIS (ELA 2023a), however various amendments have been made to the Project in response to public and agency submissions received during the exhibition period of the EIS, the amendments are discussed in more detail within the Amendment Report (ELA 2026a). Furthermore, specific additional technical studies have either been revised to assess the amendments to the Project or a new assessment undertaken in response to public and agency submissions received on the EIS.

The outcomes of these revised and additional technical studies have been used to respond to specific issues raised during the exhibition of the EIS and have assisted with the development of amendments to the Project. These are outlined in Table 3-3 below.

Table 3-3: Additional technical studies and outcomes for the Project

Technical Study		Author & Date		Related Agency and Public Submissions		Scope/Issue Raised	Outcomes	Amendments to Project
Aboriginal Cultural Heritage Assessment (ACHA) and Heritage Memorandum		Revised Assessment (Appendix L.1 and L.2 of Amendment Report (ELA 2026a))	ELA 2026c	Heritage Council of NSW (Section 4.1.10) Aboriginal Cultural Heritage Survey (Section 4.3.1.7)		To update the ACHAR to address comments received from Heritage Council of NSW and RAPs.	Following the amendments to the Project and additional information requested by Heritage Council of NSW, the ACHAR has been revised. The revised draft ACHAR has been reviewed by the RAPs and their comments incorporated into the revised final ACHAR. Impacts to Aboriginal heritage artefacts within the Project Site have been reduced based on the amendments to the Project.	Further input from the RAPs has resulted in amendments to the alignment of the Project Site, Development Footprint and Development Corridor in part to avoid potential impacts to identified Aboriginal heritage sites or valued areas.
Biodiversity Development Assessment Report (BDAR)		Revised Assessment (Appendix F of Amendment Report (ELA 2026a))	ELA 2026b	BCS (Section 4.1.1) MWRC (Section 4.2.2) Biodiversity Impacts to Koalas and Koala Habitat (Section 4.3.1.3) Biodiversity Impacts to Bats and Birds (Section 4.3.1.3)		To update the BDAR to address comments received from the BCS and to incorporate additional seasonal Bird and Bat Utilisation Surveys (BBUS), whilst meeting the requirements of Biodiversity Assessment Method (BAM) 2020 and to amend the BAM Calculator (BAM-C) to include the reduced impact area form the amended Project.	The BDAR has been updated with reference to the scope agreed during consultation with BCS.	The amended Project design has reduced the impact upon biodiversity within the Development Footprint. The design has been amended to reduce impacts upon native vegetation and the Serious and Irreversible Impact (SAII) Box-Gum woodland. Overall, impacts to the TEC Box Gum Woodland has been reduced by 15.79 ha since the submission of the EIS.
Blade throw Assessment		New Technical Assessment (Appendix J of Amendment Report (ELA 2026a))	Middleton 2024a	Group	DPE: Hazards (Section 4.1.4)	The Blade Throw Assessment prepared as part of the EIS was high level and did not follow guidelines. To address comments received from DPE: Hazards, a new technical assessment was prepared for Blade Throw.	A Project specific Blade Throw Assessment has been prepared as request by DPE: Hazards. The new assessment has identified an acceptable level of risk as per the guidelines. Further, no further impacts have been identified or mitigation required.	No amendments were required as a result of the Project specific Blade Throw Assessment.
Landscape and Visual Assessment Addendum		Addendum (Appendix D of Amendment Report (ELA 2026a))	Moir Studio 2026	MWRC (Section 4.2.2) Cumulative Visual Impacts (4.3.1.20) Landscape and Visual Impact Assessment Methodology (Section 4.3.1.1)		Updated assessment to consider the change of status of two dwellings (now involved – Q13-1 and R14-1), three additional dwelling assessments (X20-2, X18-2 and T23-1), and assessment for the Wanda Vale Farm Stay has been undertaken. An assessment of Aviation Hazard Lighting (AHL) has been considered as well as an updated cumulative impact assessment for potential visual	The results of the additional dwelling assessments were negligible for X20-2, Low for X18-2, and Low for T23-1. The Wanda Vale Farm Stay assessment concluded that the existing location would not meet all the performance objectives outlined within the Wind Bulletin, and proposed an alternative location for the Farm Stay which would meet all the performance objectives outlined within the Wind Bulletin.	No amendments were required as a result of the Landscape and Visual Assessment Addendum.

Technical Study				Author & Date		Related Agency and Public Submissions		Scope/Issue Raised	Outcomes	Amendments to Project
								impacts associated with the Project and Piambong Wind Farm.		
Noise Impact Assessment Addendum (NVIA)				Addendum (Appendix E.1 of Amendment Report (ELA 2026a))	Marshall Day Acoustics (MDA) 2024	EPA (Section 4.1.8) Noise and Vibration (Section 4.3.1.2)		To assess the noise impacts at Wanda Vale Farm Stay. The assessment of this receiver was requested by DPHI.	The assessment of Wanda Vale Farm Stay identified that the predicted noise levels would be 47.4dB, approximately 12.4dB over the base noise limit for non-associated receivers, however the predicted noise level at the identified alternative farm stay location more than 3.35 km from the nearest WTG would be within the base noise limit of 35.0dB.	No amendments were made as a result of the NVIA Addendum.
NVIA				Addendum (Appendix E.2 of the Amendment Report (ELA 2026a))	MDA 2026	Noise and Vibration (Section 4.3.1.2)		Updated to reflect change in dwelling status and to assess additional potential dwelling and building locations as requested by DPHI October 2025.	Operational noise, the predicted WTG noise levels at the nearest receiver U11-1 are below the NSW Noise Assessment Bulletin base (minimum) criterion of 35 dB LAeq. Indicative construction noise assessment indicates that construction nose could exceed the nose affected management level at non-associated receivers U11-1 and U10-1 could be exceeded by 0-5 dB LAeq however construction noise can be comfortably managed by adopting standard work methods and noise management practices.	No amendments were made as a result of the NVIA Addendum.
Social Impact Assessment Addendum (SIA)				Addendum (Appendix P of Amendment Report (ELA 2026a))	Ethos Urban 2024a	DRC (Section 4.2.1) MWRC (Section 4.2.2) Social (4.3.1.10)		The SIA Addendum was prepared to address comments received from DPHI, MWRC and DRC. The SIA Addendum was focused on providing additional social baseline data to support the impact assessment.	The SIA Addendum updated the assessment of impacts relevant to the Project and cumulative impacts. Social impact mitigation measures have been updated reflecting the updated assessment outcomes from the incorporation of the additional social baseline data.	No amendments were required as a result of the SIA Addendum. In response to the DRC and MWRC comments relating to social matters, a draft CWAS has been prepared in response.
Surface Water & Groundwater				Revised Assessment (Appendix M and N of Amendment Report (ELA 2026a))	ELA 2024a; ELA 2024b	DPE – Water (Section 4.1.5) WaterNSW (Section 4.1.16) MWRC (Section 4.2.2) Water, Soils and Land Use (Section 4.3.1.8)		The revised surface water and groundwater assessments were prepared to address comments received from DPE – Water, WaterNSW and MWRC.	The revised surface water and groundwater assessments have further outlined the water supply options for the Project, the results of water quality modelling, mitigation measures relating to water quality impacts, and provided an revised cumulative impact assessment.	No amendments were required as a result of the revised surface water and groundwater assessments.

Technical Study		Author & Date	Related Agency and Public Submissions	Scope/Issue Raised	Outcomes	Amendments to Project
Traffic and Transport Impact Assessment (TTIA)	Revised Assessment (Appendix H of Amendment Report (Stantec 2026, ELA 2026a))	Stantec 2026	TfNSW (Section 4.1.14) DRC (Section 4.2.1) MWRC (Section 4.2.2) Traffic and Transport (4.3.1.4)	The TTIA has been revised to reflect the updated route study prepared by Rex J Andrews (2024) and provide additional information as requested by TfNSW and DPHI. The TTIA has been updated to reflect the change in expected traffic volumes because of the onsite TWAF.	The revised TTIA has been revised to consider the comments received on the EIS. Responses to the submissions received have been addressed and outlined within Appendix A of the TTIA (Appendix H). As the TWAF is expected to house 100% of non-local workforce, the expected light vehicle traffic numbers on local roads during weekday peak hours has been reduced by 89 % on average. At the intersection of Goolma Road/ Twelve Mile Road, the cumulative right turn volumes from Goolma Road into Twelve Mile Road indicate that only a Basic Right Turn (BAR) intersection treatment is warranted.	The revised TTIA has estimated the construction traffic generation for trips approaching the Project Site at 96,639 by way deliveries, an increase from the traffic estimated in EIS. The proposed upgrade to the intersection at Goolma Road and Twelve-Mile Road includes a BAR and enables OSOM vehicle movements. The impacts of the upgrade have been assessed.
Telecommunications Impact Assessment	Revised Assessment (Appendix K of Amendment Report (ELA 2026a))	Middleton Group 2024b	WaterNSW (Section 4.1.16)	To address the WaterNSW comment regarding a Australian Communications and Media Authority (ACMA) link that transects the Project Site which should be assessed considering the antenna heights.	The height of the two antennas at Burrendong Dam and Mount Bocoble have been considered within the revised assessment. There will be an increased level of interference when compared with the 2021 assessment. However, the Project will not cause any material impact to the link. The link direction/location has been shifted slightly; the assessment has considered this shift.	No amendments were required as a result of the revised Telecommunications Impact Assessment.
Route Survey Assessment	Revised Assessment (Appendix G of Amendment Report (ELA 2026a))	Rex J Andrews 2024	TfNSW (Section 4.1.14) DRC (Section 4.2.1) MWRC (Section 4.2.2) Traffic and Transport (4.3.1.4)	To update the Route Study to consider the upgrades to the Over Size Over Mass (OSOM) routes which have been progressed or completed since the submission of the EIS.	The route study has identified the key constraints encounter on the routes and estimated the work required to make the route viables for the delivery of all components and infrastructure required for the Project.	The route study has been updated based on upgrades to the route from port to Project Site since the submission of the EIS. As a result of the revised Route Study, three (3) routes will be utilised for the Project, Route 1 for OSOM (Blades), Route 2 for OSOM (Towers (max loaded height 6.1m)) and Route 3 for remaining components (max loaded height 5.6m).
CWAS	New Technical Assessment (Appendix Q of Amendment Report (ELA 2026a))	Ethos Urban 2024b	DRC (Section 4.2.1) MWRC (Section 4.2.2) Workforce Accommodation (Section 4.3.1.11 and 4.3.1.10)	To address the MWRC and DRC comments relating to the lack of accommodation in the region to provide for the peak workforce.	The CWAS has been prepared to consider and minimise impacts on the local housing market. The strategy provides mitigation options, monitoring plans and methods of engagements.	The amendments to the Project have not influenced the outcome of the CWAS and its ability to alleviate local housing constraints.

Technical Study		Author & Date	Related Agency and Public Submissions	Scope/Issue Raised	Outcomes	Amendments to Project
TWAF Addendum	New assessment of the TWAF (Appendix A.2 of the Amendment Report ELA 2026a)	Barnson 2025	DRC (Section 4.2.1) MWRC (Section 4.2.2) Workforce Accommodation (Section 4.3.1.11 and 4.3.1.10)	To address the MWRC and DRC comments relating to the temporary workers required for the construction of the Project	The TWAF has been included as part of the Project and will accommodate up to 260 workers.	The amendments of the Project have included the addition of a TWAF in order to accommodate construction workers during the construction phase of the Project.
Preliminary Site Investigation (PSI)	New Technical Assessment (Appendix O of the Amendment Report ELA 2026a)	Ramboll 2025	DPHI request	To assess whether contamination has the potential to exist within the Project Site and determine if further investigation is required.	The PSI has identified the Project Site as low risk with regards to contamination of soil, surface water or groundwater.	No amendments were required as a result of PSI.

4. Response to Submissions

This section provides responses to issues and concerns raised during the public exhibition period including to government agency submissions and to community submissions.

4.1. Agency Submissions

Government agencies are responsible for making submissions relating to their areas of responsibility and typically involve technical matters. Matters that require the consideration of consent authorities, or to be addressed by conditions should development consent be granted are also considered.

Below outlines the Proponent's response to specific matters raised by each agency submission. In total, 18 government agency and local government submissions were received for the Project. The issues raised in the agency submissions are identified in the text boxes, with a response provided below for each.

4.1.1. Biodiversity Conservation and Science Group

The Biodiversity Conservation and Science Group (BCS) has been restructured during the Submissions phase and are now (September 2025) called CPHR. This section outlines all agency submissions received from BCS and CPHR.

Survey effort has been very limited outside of the development footprint and the impacts of the project on adjacent areas of biodiversity value have been insufficiently quantified. A significant proportion of the surveys completed to date have not met the minimum requirements of the BAM.

RESPONSE

Surveys were undertaken within the Development Corridor and surrounding landscape. As outlined within the revised BDAR (Section 4.1) targeted surveys for species credit species were undertaken in accordance with the relevant guidelines for fauna (Department of Environment and Conservation [DEC] 2004), however many of the surveys were undertaken prior to the implementation of the NSW guidelines for surveying particular threatened species.

ELA has a strong knowledge of the Project Site and the local surroundings and have undertaken long-term field investigations across the Project Site over five (5) years, with the results of surveys undertaken considered to be representative of the use of the Project Site by species.

Where targeted fauna surveys have not been completed within the Development Corridor in specific accordance with the BAM, species have been assumed to be present across all sections within their associated Plant Community Type (PCTs) across the entire Development Footprint, including *Aprasia parapulchella* (Pink-tailed Legless-lizard) and *Keyacris scurra* (Key's Matchstick Grasshopper). Expert reports have been sought and undertaken for both these species. Based on the Expert Report, the habitat for the Pink-tailed Legless-lizard has been refined since the submission of the EIS and the Key's Matchstick Grasshopper has now been included within the updated BAM-C.

Targeted fauna surveys for various parts of the Development Corridor (nocturnal spotlighting and call playback was undertaken along the southern transmission line and the Road Upgrade areas) were not undertaken in accordance with the BAM and therefore the following species have been assumed to be present within habitat along the southern transmission line and the road upgrade areas (Table 4-1). The Proponent is seeking formal concurrence from the decision-maker to defer targeted fauna surveys for these species listed in Table 4-1 until post-approval.

Partial surveys have been completed for the species outlined in Table 4-1. Whilst no individuals were recorded, these species are considered to have low to moderate (except Powerful Owl) likelihood of occurrence within the Project Site that were inaccessible or not surveyed adequately due to land access limitations and timing constraints. Consequently, these species have also been assumed present in the BAM assessment.

Table 4-1: Threatened fauna species with partial surveys

Species	Common Name	Likelihood of Occurrence	Assumed in BAM	Survey timing	Survey Effort	Outstanding Survey Area
<i>Cercartetus nanus</i>	Eastern Pygmy Possum	Low	Yes	Oct - Mar	1,246 trap nights have been completed.	Approximately 58 ha requires survey.
<i>Petaurus norfolcensis</i>	Squirrel Glider	Low - moderate	Yes	All Year	1,246 trap nights and 288 hours of spotlighting have been completed.	Approximately 55 ha requires survey.
<i>Phascogale tapoatafa</i>	Brush-tailed Phascogale	Low - moderate	Yes	Dec - June	1,246 trap nights and 288 hours of spotlighting have been completed.	Approximately 97 ha requires survey. Survey methodology was updated
<i>Tyto novaehollandiae</i>	Masked Owl	Moderate	Yes	All Year	Completed 288 hours of spotlighting and call playback at 15 locations.	Approximately 55 ha requires survey.
<i>Ninox strenua</i>	Powerful Owl	Moderate - high	Yes	All Year	Completed 288 hours of spotlighting and call playback at 15 locations.	Approximately 3 ha requires surveying.
<i>Ninox connivens</i>	Barking Owl	Moderate	Yes	All Year	Completed 288 hours of spotlighting and call playback at 15 locations.	Approximately 55 ha requires survey.
<i>Keyacris scurra</i>	Key's Matchstick Grasshopper	Low - moderate	Yes	Mar – May Sept – Nov	Expert report completed in February 2025. Survey approach was confirmed by the BOS Helpdesk, however was received after the optimal detection period for the species.	Approximately 11.5 ha requires surveying.
<i>Burhinus grallarius</i>	Bush Stone-Curlew	Low	Yes	All Year	Completed 288 hours of spotlighting and call playback at 15 locations. 483 independent bird surveys across 19 sites. Transect walks over 770 ha.	Approximately 22 ha requires survey.

Threatened flora surveys have been undertaken across the Development Corridor using the following methods:

- Random Meander covering an area of 1,447 ha
- Transects 5 m wide covering an area of 127 ha for herbs, orchids and grasses
 - targeting potential habitat for *Dichanthium setosum* (Bluegrass), *Tylophora linearis*, *Euphrasia arguta*, *Diuris tricolor* (Pink Donkey Orchid), *Prasophyllum petilum* (Tarengo Leek Orchid))
- Transects 20 m wide covering an area of 700 ha for shrubs and trees
 - targeting potential habitat for *Pomaderris queenslandica* (Scant Pomaderris), *Eucalyptus alligatrix* subsp. *alligatrix*, *Acacia ausfeldii* (Ausfelds Wattle), *Pomaderris cotoneaster* (Cotoneaster Pomaderris) and *Grevillea wilkinsonii* (Tumut Grevillea)
- Two phased grid based systematic search 40m circles (550 x 1256m²) at 100 m grid locations covering an area of 68 ha
 - Targeting potential habitat for *Tylophora linearis*, *Euphrasia arguta*, *Pomaderris queenslandica* (Scant Pomaderris), *Grevillea wilkinsonii* (Tumut Grevillea).

In February 2025, additional targeted threatened species surveys were undertaken across the broader Development Corridor for the Project within the Inland Slopes subregion. Surveys were completed for various flora species, although the survey period for *Grevillea wilkinsonii* fell outside its optimal detection window, any individuals representing the genus were considered. Areas previously surveyed using transects (e.g. along the power easement) during the ideal survey period were excluded from the additional surveys.

A total of 384 grid intersects overlapped the Development Corridor. Many additional intersects fell just outside the boundary, and nearby suitable habitat inside the boundary was substituted to maintain survey integrity. This resulted in 550 circular plots surveyed, covering approximately 67.5 ha.

Of the 550 plots searched, 23 plots (<3 ha) were inaccessible due to steep, unstable terrain and were assessed as unsuitable habitat. The methodology and results were discussed with CPHR (19 May 2025; DOC25/396152) and the survey results were deemed adequate. Given the comprehensive coverage of suitable habitat and absence of target species within surveyed areas, it was reasonable to conclude that no threatened species are unlikely to occur within the small, unsurveyed portions of the Project Site. Given the comprehensive coverage of suitable habitat and absence of target species within surveyed areas, it is reasonable to conclude that the species are unlikely to occur within the small unsurveyed portions of the Project Site.

Where targeted flora surveys have not been completed within the Development Corridor in accordance with the BAM due to being inaccessible or partially surveyed, species have been assumed to be present within their associated PCTs across the entire Development Footprint where survey has not been undertaken, which includes the following species:

- *Grevillea divaricata*
- *Persoonia marginata* (Clandulla Geebung)
- *Tylophora linearis*
- *Diuris tricolor* (Pine Donkey Orchid)
- *Prasophyllum petilum* (Tarengo Leek Orchid)
- *Swainsona recta* (Small Purple-pea)
- *Swainsona sericea* (Silky Swainson-pea).

Targeted flora surveys for various parts of the Development Corridor (along the southern transmission line) were not undertaken in accordance with the BAM and therefore the following species have been assumed to be present within habitat along the southern transmission line (Table 4-2). The Proponent is requiring formal concurrence from the Minister for the Environment under Section 7.14 of the *Biodiversity Conservation Amendment (Biodiversity Offsets Scheme) Act 2024* to defer targeted flora surveys for these species listed above and in Table 4-2 until post-approval.

Table 4-2: Threatened flora species with partial surveys

Species	Common Name	Likelihood of Occurrence	Assumed in BAM	Survey timing	Survey Effort	Outstanding Survey Area
<i>Grevillea divaricata</i>		Low	Yes	Apr	Completed 10 m transect surveys across 47 ha. Whilst the survey is limited, this species is visible all year. No species with the same leaf type was recorded.	Approximately 5.5 ha requires survey.
<i>Persoonia marginata</i>	Clandulla Geebung	Low	Yes	Jan-Mar	Completed 10 m transect surveys across 47 ha. Whilst the survey is limited, this species is visible all year. No species with the same leaf type was recorded.	Approximately 48 ha requires survey.

Minimal Bird and Bat Utilisation Surveys (BBUS) have been completed. This means there is currently a lack of baseline data for quantifying potential turbine strike impacts and preparing an accurate risk assessment of the proposed turbine locations.

RESPONSE

The BBUS undertaken as part of the EIS (ELA 2023a) were completed from December 2020 to February 2021, one complete summer season, and one month of seasonal data collected at height (Met Mast). Following the submission of the EIS, additional BBUS have commenced, with the following survey seasons completed (Table 4-3) and included within the revised BDAR (ELA 2026b).

Table 4-3: Additional BBUS Surveys Information

Survey Type	Year	Season	Date	Number of field days	Number of Sites	Number of surveys
BDAR	2020-2021	Summer	17 Dec - 24 Feb	12	16	52
BBUS	2021	Spring	16 Sept - 29 Oct	4	10	20
Total 2020 - 2021				16		72
BBUS	2024	Autumn	27 - 31 May	5	16	55
BBUS	2024	Winter	19 - 23 Aug	5	19	76
BBUS	2024	Spring	21 - 25 Oct	5	19	76

Survey Type	Year	Season	Date	Number of field days	Number of Sites	Number of surveys
BBUS	2025	Summer	2 - 6 Feb	5	19	69
BBUS	2025	Autumn	28 Apr - 2 May	5	19	74
BBUS	2025	Winter	18 – 22 Aug	5	19	74
BBUS	2025	Spring	12 – 16 Oct	5	19	74
BBUS	2026	Summer	2 – 6 Feb	5	18	70
Total 2024 - 2026				40		568
Total Surveys				56		640

The Bird Utilisation Surveys (BUS) have recorded a total of 125 bird species from 10,232 individual bird observations collected over the seven seasonal survey periods. A total of 16 species have been recorded flying at heights within the Rotor Swept Area (RSA; 65 m – 250 m) within the Development Corridor, including several raptors and threatened species (Table 4-4).

Table 4-4: Species observed flying at RSA height within the Development Corridor (65-250 m)

Species	Number of indiv. flights in RSA	Total number of indiv. flights	Proportion of flights in RSA (%)
Raptors			
Brown Falcon	3	7	42.9
Nankeen Kestrel	5	10	50.0
Peregrine Falcon	1	1	100.0
Wedge-tailed Eagle	136	230	59.1
Whistling Kite	1	2	50.0
Threatened Species			
White-throated Needletail [^]	148	273	54.2
Dusky Woodswallow*	24	106	22.6
Others			
Australian Raven	14	340	4.1
Australian Magpie	12	294	4.1
Australian White Ibis	20	35	57.1
Pied Currawong	9	196	4.6
Sulphur-crested Cockatoo	1	171	0.6
Great Cormorant	2	2	100.0
Tree Martin	2	73	2.7

Based upon the data collected during the BUS, historical records and documented fatalities at operational wind farms in Australia, a baseline bird risk assessment was undertaken to determine those bird species (moderate or high risk rating) that were assessed further in Collision Risk Modelling (CRM). The baseline bird risk assessment (Section 6 of Appendix F.1; Amendment Report (ELA 2026a)) identified a total of seven bird species at 'Moderate' or 'High' collision risk. The seven species, including:

- Brown Falcon
- Dusky Woodswallow
- Little Eagle
- Nankeen Kestrel
- Peregrine Falcon
- Wedge-tailed Eagle
- White-throated Needletail.

For these species the CRM then included the following steps:

- Step 2 - Assess individual species collision risk
- Step 3 - Assess bird activity for at-risk species
- Step 4 - Incorporate steps 1 and 2 to estimate number of bird collisions.

Species that were not recorded flying within RSA (Little Eagle) could not be modelled beyond the calculation of their individual species collision risk (Step 2 of the Band CRM). Accordingly, calculation of collision risk estimates applying the full Band CRM, was completed for the following species:

- Brown Falcon
- Dusky Woodswallow
- Nankeen Kestrel
- Peregrine Falcon
- Wedge-tailed Eagle
- White-throated Needletail.

Collision risk estimates were calculated through the application of the Band CRM. The yearly collision estimates for Brown Falcon, Dusky Woodswallow, Nankeen Kestrel and Peregrine Falcon was relatively low, ranging from 0.85 (Peregrine Falcon) to 10.68 (Dusky Woodswallow) birds under a no avoidance scenario, through to 0.009 (Peregrine Falcon) birds and 0.11 (Dusky Woodswallow) birds under a 99% avoidance scenario.

For White-throated Needletail with large flocks recorded in the RSA during spring 2024 BUS (60 individuals) and autumn 2025 BUS (53 individuals), the yearly collision estimates ranges from 65.45 birds under a no avoidance scenario, through to 3.27 birds and 0.65 birds under a 95% and 99% avoidance scenario, respectively.

The Wedge-tailed Eagle yearly collision estimate is highest, ranging from 124.04 birds under a no avoidance scenario, through to 6.22 birds and 1.24 birds under a 95% and 99% avoidance scenario, respectively. A full summary of the collision results is provided in Section 6 of Appendix F.1; Amendment Report (ELA 2026a).

Bat Activity Surveys (BAS) have recorded a total 23 species and have identified as either present or potentially present from all microbat call recordings across the combined 2020 – 2025 survey period. Approximately 74% of definite, positively identified calls across the combined survey period were recorded from just four common species:

- Gould's Wattled Bat (*Chalinolobus gouldii*) – 14,222 total calls, 30%
- South-eastern Freetail Bat (*Ozimops planiceps*) – 10,872 total calls, 23%

- White-striped Freetail Bat (*Austronomus australis*) – 5,447 total calls, 11%
- Little Forest Bat (*Vespadelus vulturnus*) – 4,918 total calls, 10%.

Seasonal bat activity across the Project Site has followed expected seasonal trends, with the highest number of calls and call activity recorded during summer 2025, spring 2024 and summer 2020-21, with reduced activity recorded during autumn 2024 and winter 2024.

Based upon the data collected during the BAS, historical records within 10 km of the Project Site and documented fatalities at operational wind farms in Australia, a baseline bat risk assessment was undertaken to determine those bat species (moderate or high risk rating) that were assessed further in the CRM. Species were included in the risk assessment if they met one or more of the following criteria:

- Listed as threatened under the NSW *Biodiversity Conservation Act 2016* (BC Act) and/or the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), including Migratory species
- Known to be prone to turbine collision, based on documented fatalities at operational wind farms.
- Bat call activity recorded at heights of 50 m and 100 m, indicating the potential to fly within the RSA (65–250 m) of proposed WTGs.

The baseline bat risk assessment (Section 6 of Appendix F.1; Amendment Report (ELA 2026a)) identified a total of seven bird species at 'Moderate' or 'High' collision risk. The eight species, including:

- Eastern False-Pipistrelle
- Gould's Wattle Bat
- Greater Broad-nosed Bat
- Grey-headed Flying-fox
- Large Bent-winged Bat
- South-eastern Freetail Bat
- White-striped Freetail Bat
- Yellow-bellied Sheath-tailed Bat.

In the absence of species-specific flight data within RSA, collision risk modelling could not be progressed beyond Step 1 of the CRM, which calculates the baseline likelihood of individual species encountering turbine blades. Hence a qualitative collision risk assessment has been undertaken for relevant bat species.

Based up the BBUS results to date, a WTG risk assessment has been developed for the Project to identify an individual risk rating for each proposed WTG. The risk assessment has been developed in consultation with the CPHR of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) and has undergone an external review by a team of data scientists and ecological statisticians at Symbolix.

The WTG risk assessment framework utilises five measures/parameters related to the bird and bat species assemblages and activity recorded across the Project Site, along with the abundance of woodland and forest habitat surrounding the proposed WTG locations, as follows:

- BUS - total flight activity within RSA
- BUS – Moderate/High risk rating species
- BAS - total call activity of at RSA height species
- BAS - Moderate/High risk rating species
- Woodland/forest habitat (200 m buffer surrounding WTG).

The score for each measure ranges from 0 – 2 and accumulate across the five measures to provide a total score of between 0 – 10 and a corresponding Risk Rating for each proposed WTG. The five WTG risk rating categories (Very Low, Low, Moderate, High and Very High) reflect a proportionate categorisation of risk ratings across the potential accumulated scores (further details are provided in Section 6 of Appendix F.1; Amendment Report (ELA 2026a)).

The results of the WTG risk assessment are provided in Section 6.13 of Appendix F.1; Amendment Report (ELA 2026a), with five (5) WTGs rated as low, 45 WTGs rated as moderate and 20 WTGs rated as high.

The BBUS's are continuing until two (2) consecutive years of data has been gathered at which point an updated CRM will be prepared for inclusion within the Bird and Bat Adaptive Management Plan (BBAMP), post approval. Additionally, a proposed curtailment strategy has been outlined within Section 7 Appendix F.1 of the Amendment Report (ELA 2026a).

The proposal to defer survey to post-approval means that it is not possible to gain a clear understanding of the total impact. We would appreciate having the opportunity to meet with the Department of Planning, Housing and Infrastructure (DPHI) to discuss the implications this has on accurately assessing the biodiversity impacts prior to determination, and the issues associated with recalculating credit offset liabilities post-approval

RESPONSE

Additional surveys across the windfarm area of the Project Site have been conducted since the submission of the EIS (Table 4-5).

Table 4-5: Additional Targeted Surveys for Candidate Species

Date	Surveyors	Location	Target-species
27 and 28 Feb 2024	Cheryl O'Dwyer, Lachlan Metzler and Alex Copan	Transmission line TWAF	PCT mapping, Diurnal birds, threatened flora transects
27-31 May 2024	Cheryl O'Dwyer, Lachlan Metzler, Tomas Kelly, Kieren Stephenson-Banks, Greg Natesan	Windfarm	BBUS across 16 locations (10 in windfarm, 6 as control sites). Anabat deployment at same 16 sites – 4 nights.
19-23 August 2024	Cheryl O'Dwyer, Lachlan Metzler	Windfarm	BBUS across 16 locations (10 in windfarm, 6 as control sites). Anabat deployment at same 16 sites – 4 nights
22-25 October 2024	Cheryl O'Dwyer, Lachlan Metzler, Shirley Chia, Phillip Allen	Windfarm	BBUS across 16 locations (10 in windfarm, 6 as control sites). Anabat deployment at same 16 sites – 4 nights
3-7 February 2025	Cheryl O'Dwyer, Shirley Chia, Natalie DeLosa, Greg Natesan	Windfarm	BBUS across 16 locations (10 in windfarm, 6 as control sites). Anabat deployment at same 16 sites – 4 nights
24-28 February 2025	Cheryl O'Dwyer, Ellie Young, Lilly Outram, Mel Thurtell, Liam Scanlan, Sophie Montgomery, Alex Yates	Windfarm Transmission Line Access tracks	556 grid circles (40m diameter) searches for <i>Euphrasia arguta</i> , <i>Tylophora linearis</i> , <i>Pomaderris queenslandica</i> , <i>Grevillea divaricata</i> , <i>Persoonia marginata</i> , <i>Grevillea wilkinsonii</i> .
24-27 March 2025	Rob Spiers, Jarmin Thornberry (Capital Ecology). Cheryl O'Dwyer, Ellie Young, Kasey Tada	Windfarm Transmission Line Access tracks	Targeted searches for Pink-Tailed Legless Lizard habitat

Date	Surveyors	Location	Target-species
28-30 April, 1-2 May 2025	Cheryl O'Dwyer, Phil Allen, Matt Dale, Ellie Young, Natalie DeLosa	Windfarm	BBUS across 16 locations (10 in windfarm, 6 as control sites). Anabat deployment at same 16 sites – 4 nights
18-22 August 2025	Cheryl O'Dwyer, Phil Allen, Lachlan Metzler, Natalie DeLosa	Windfarm	BBUS across 19 locations (11 in windfarm, 8 as control sites). Anabat deployment at 16 sites – 4 nights
13-16 October 2025	Matt Dale, Natalie DeLosa, Ellie Young	Windfarm	BBUS across 19 locations (11 in windfarm, 8 as control sites). Anabat deployment at 16 sites – 4 nights
24 October 2025	Cheryl O'Dwyer, Edward Moar	Windfarm Transmission Line	Targeted Keys Matchstick Grasshopper surveys
28 October 2025	Cheryl O'Dwyer, Edward Moar	Yarrabin Road	Targeted searches for <i>Diuris tricolor</i> , <i>Swainsona sericea</i> , <i>S.recta</i> , <i>Prasophyllum petilum</i>
10 November 2025	Cheryl O'Dwyer, Lily Outram	Yarrabin Road	Targeted searches for <i>Diuris tricolor</i> , <i>Swainsona sericea</i> , <i>S.recta</i> , <i>Prasophyllum petilum</i>
2-6 February 2026	Cheryl O'Dwyer, Phil Allen, Kasey Tada	Windfarm	BBUS across 18 locations (11 in windfarm, 7 as control sites). Anabat deployment at 16 sites – 4 nights

The data from these surveys has been collated and analyses as part of the revised BDAR (ELA 2026b). However, it is important to note that, presence has been assumed, and credits have been calculated where surveys were not compliant with survey methodologies under the BAM or in areas that were inaccessible during survey. These credits will be refined once the detailed design has been determined.

The BDAR should provide further detail on the efforts the proponent has made to avoid and minimise impacts to Serious and Irreversible Impact (SII) entities. In addition, further assessments and survey will need to be applied to adequately assess the impacts to SII entity cave-dwelling microbats.

RESPONSE

Since the exhibition of the EIS, the Proponent has worked to try and minimise the impacts upon SII where feasible, whilst maintaining the integrity of the Project. Appendix N of the revised BDAR (Appendix F of the Amendment Report ELA 2026b) provides a map book comparing the Development Footprint presented within the EIS (ELA 2023a) and the amended Development Footprint / Development Corridor. This map book includes an illustration of reductions in Box Gum Woodland.

Impacts to Box Gum Woodland are deemed to be an SII, Section 8.1 of the revised BDAR (ELA 2026b) provides an updated assessment for Box-Gum Woodland against the assessment criteria for SII entities. A hierarchy was followed to minimise impacts by firstly avoiding those areas that were in woodland condition, followed by those areas with a diverse ground layer in the Derived Native Grassland (DNG) areas, especially areas that conformed to the EPBC Act listed community; through to degraded grasslands with a priority of locating impacts within poor quality areas. DNG refers to areas that result from historical clearing and current agricultural land use. Of the 76.2 ha of Box Gum Woodland that remains present within the Development Footprint, 90% is DNG.

As shown in Figure 4-1 and described further within the revised BDAR (ELA 2026b), impacts to the SAI Box-Gum Woodland have decreased from Project inception in 2020 (255.6 ha) to the Development Footprint (112.37 ha) presented within the EIS (ELA 2023a) and then finally to the current amended Development Footprint (74.51 ha).

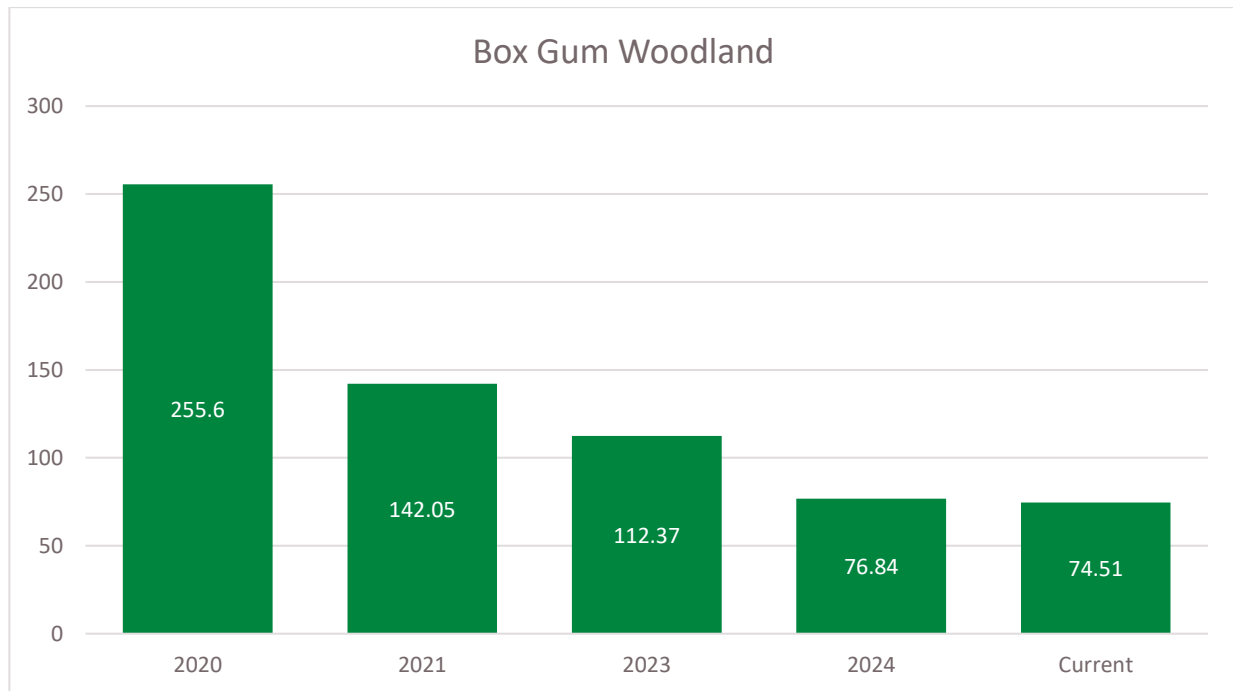


Figure 4-1: Impacts to Box-Gum Woodland from Project inception through to the current Development Footprint

At the request of CPHR the Proponent has investigated options to provide Additional Mitigation Measures to further minimise impacts to Box Gum Woodland. Once final impacts have been established, the Proponent proposes to provide for a 1:1 protection (measured by area) and enhancement of Box-Gum Woodland within the locality, such that the impacts of the Project are minimised in a local context. A site-based option has been proposed to achieve additional mitigation measures to compensate for the loss of Box-Gum Woodland within the locality. This offset will be managed to increase the future Vegetation Integrity Score of Box Gum Woodland PCTs. The site will be secured post-approval under a Biodiversity Stewardship Site (BSS) Agreement.

Two suitable offset properties (Option A and Option B) have been identified, both within the South Western Slopes Bioregion. Details are summarised in Table 4-6 below. Both Options are within the Project Site and within areas mapped as Box Gum Woodland.

Table 4-6: Summary details of offset properties Options A and Options B

Parameter	Option A	Option B
Location	Within South Western Slopes Bioregion Adjacent to riparian corridor	Within South Western Slopes Bioregion
Total Area	126.3 ha	140.4 ha
Validated Box-Gum Woodland	3.6 ha	5.5 ha
SVTM Mapped Box-Gum Woodland	5.2 ha	68.2 ha
Potential Rehabilitation Area	99.3 ha (cleared / not classified)	45.4 ha (cleared / not classified)

Parameter	Option A	Option B
Connectivity Potential	High – adjacent to riparian areas	Moderate – dispersed patches
Preferred Option	Yes	Backup / contingency

Option A is currently the preferred site due to its larger potential area for rehabilitation (99.26 ha) and its location adjacent to a riparian corridor, providing potential connectivity to other areas of vegetation and connectivity to Box Gum Woodland. However, given the potentially long timeframe required to establish a Biodiversity Stewardship Agreement (BSA), and risks of unforeseen circumstances such as changes in land ownership or access constraints, Option B has also been considered as a contingency.

To address the potential SAI impacts to Box-Gum Woodland, the Proponent commits to a suite of additional mitigation measures, to be implemented post-approval of the Project. These measures are aimed at ensuring long-term ecological improvement and the successful establishment of Box-Gum Woodland within the offset site.

The Proponent commits to the following measures post-approval:

- Validate vegetation and condition class mapping by carrying out comprehensive on-ground surveys to confirm vegetation extent, PCTs and condition zones
- Undertake a soil assessment of the proposed land-based offset area to validate the soil types are suitable for Box-Gum Woodland restoration
- Establish management zones based on condition and restoration potential to guide targeted management interventions. This will include the preparation of a Restoration Management Plan to be developed by a qualified person (Restoration Ecologist)
- Securing the offset site in perpetuity under a Biodiversity Stewardship Agreement (BSA) in accordance with the NSW BC Act
- Rehabilitation of up to 74.51 ha (equivalent to the impact area subject to detailed design and/or micro-siting), with potential for additional restoration to improve connectivity and expand habitat corridors within the BSS
- Establishment of a Total Fund Deposit (TFD) to support all required activities throughout the life of the BSA
- Precluding the trading of ecosystem credits generated from the BSS associated with 74.51 (or actual impacts based on micro-siting) Box Gum Woodland PCTs to further ensure conservation outcomes
- If Option A or Option B fail to meet the measures outlined above or become unavailable post-approval due to factors outside of the control of the Proponent, the Proponent commits to finding a similar land-based offset property in consultation with CPHR.

The following restoration and land management activities represent examples of actions that may be implemented to support the establishment and long-term improvement of Box-Gum Woodland CEEC condition within the offset site, subject to site-specific requirements and the outcomes of vegetation validation:

- Site protection by maintaining the boundary fencing to exclude livestock, feral animals and manage access
- Implementation of strategic grazing (if appropriate) to encourage native understory regeneration.

Additionally, since the submission of the EIS, additional BBUS have commenced and are ongoing. The data collected from the BBUS has been analysed to determine the level of activity across the Project Site for the cave dwelling bats which are deemed as an SAI entity, including *Chalinolobus dwyeri* (Large-eared Pied Bat), *Miniopterus orianae oceanensis* (Large Bent-winged Bat), *Miniopterus australis* (Little Bent-winged Bat) and

Vespadelus troughtoni (Eastern Cave Bat). Section 9.2 of the revised BDAR (ELA 2026b) provides an updated assessment for the Large-eared Pied Bat and Eastern Cave Bat against the assessment criteria for SAI entities.

However, it is important to note that there are no breeding roosts within the Development Corridor nor within 2 km of the Development Corridor, therefore considering the Development Corridor as an SAI for potential breeding habitat is not required.

Habitat critical to the survival of these species are roosts for shelter and breeding such as caves, cliff lines, outcrops and abandoned fairy martin nests. These are not located within the Development Corridor, nor within the Development Footprint. Aerial imagery and scanning the broader landscape using binoculars did not reveal potential breeding sites. There will therefore be no impacts to critical habitat.

Individuals of both species have been recorded within the Project Site, likely undertaking foraging activities. Whilst diet has not been examined, observations suggest that both species are relatively slow flyers that forage predominately below the canopy, including in woodlands and grasslands, feeding on small flying insects. Foraging habitat for both species is found within several km of cliff lines.

The proposed Development Footprint has been modified and evaluated to avoid the removal of woodland and better-quality grasslands where possible. Much of the DNG has been extensively modified due to grazing. This reduces the likelihood of impacts to foraging habitat for these species.

The TBDC identifies that loss of breeding habitats only has an SAI for cave-dwelling bats. However, it is noted that the absence of other descriptions does not discount other impacts. The assessor has considered this and has provided the following information to inform the decision process:

- Neither species is listed under the SAI Principles under Principles 1 (rapid rate of decline), Principle 2 (small population size), or Principle 3 (limited geographic distribution).
- The Project has deliberately avoided all impacts to any potential breeding or roosting habitats for all species.
- Only 4 individual Large Bent-winged Bats have been identified in carcass monitoring reports suggesting a low level of activity occurring at RSA. However, a risk assessment has been completed for this species and mitigation measures addressed.
- Eastern Cave Bats were not recorded flying at 50 m or 100 m and are unlikely to be impacted by blade strike.
- A BBAMP Framework is proposed in the revised BDAR (ELA 2026b) which requires notification of impacts to threatened species to CPHR.

The SAI assessment for cave-dwelling microbats indicates that the Project is unlikely to constitute a SAI, however additional and appropriate measures have been developed should impacts upon these be recorded. The proposed measures would involve commitment from the Proponent to contribute up to \$200,000 of funding over five (5) years to a local research project to GPS tag and track Large Bent-winged Bats from the species Wellington Caves roost site, located approximate 21 km west of the Project Site, with the aim of increasing knowledge regarding their flight behaviour and roost utilisation in the region.

The research would mirror a recent study which successfully utilised GPS tagging to track the flight distances, heights and patterns of the closely related Southern Bent-winged Bat in southern Victoria and South Australia (Bush et al. 2025). The proposed research project at Wellington Caves would include a similarly designed capture-mark-re-capture study for Large Bent-winged Bat, utilising stationary receivers positioned at varying distances (e.g. 2 km, 10 km, 25 km) and landscape positions (e.g. valley and ridgetop) from the roost cave. Receivers would ideally be deployed within the Project Site and near to other planned or operational wind farm developments in the

Central West Orana Renewable Energy Zone, to increase understanding of the species flight behaviours and patterns in the context of wind farm operations.

This proposed additional and appropriate measure would be implemented through the Project BBAMP and demonstrates an effort by the proponent to support evidence-based assessment and adaptive management. The outcomes of this research are expected to inform ongoing monitoring and mitigation measures, such as those outlined in the BBAMP Framework (Section 7.2 of the revised BDAR (ELA 2026b)), and may contribute to improved conservation outcomes for microbat species across the wider renewable energy sector.

A smart curtailment approach is proposed to investigate and trial technologies to further reduce collision risk to microbat species at specific WTGs of relatively high risk. The smart curtailment approach involves the use of technology such as the Wildlife Acoustics Song Meter with Analysis and Remote Transfer (SMART) monitoring system (Wildlife Acoustics 2025) which provides remote call detection, analysis and acoustically triggered curtailment in real time.

Initially, the SMART system will be installed on one of the temporary met masts during the pre-operation period (12-18 months) at a height within the RSA (>65 m). The SMART system will collect additional at height baseline microbat call data to better understand the range and temporal patterns of call activity within the RSA, along with the species-specific call parameters at height and confirm the suitability of the technology in an operational Australian context. The key outcome of the met mast SMART system trial is to define microbat call activity thresholds which will trigger operational carcass monitoring. This will be documented in the Project BBAMP prior to the commencement of operations.

Operationally, the SMART system is proposed to be implemented for smart curtailment at a subset (minimum of five) of the 33 WTGs associated with relatively high at risk microbat activity (see Table 7 8; Section 7.1.1.2 of the revised BDAR (ELA 2026b)). The SMART system's real time call detection and analysis software will be used to trial and develop the following two components of the smart curtailment approach:

Carcass monitoring trigger: microbat call activity recorded by the SMART system on operational WTGs which is above the defined threshold in the Project BBAMP, will result in the carcass monitoring trigger being activated. Upon activation of the trigger, a carcass search will be undertaken within the defined search zone of the WTG as soon as possible following the trigger. The results of the carcass search (i.e. microbat carcass detection or absence, species identification and carcass age), along with any relevant environmental, spatial or temporal factors at the time of the trigger, will be recorded and actioned as necessary, within the adaptive management framework of the Project BBAMP. This monitoring trigger and response seeks to increase understanding of the relationship between microbat call activity and turbine fatality rates (Solick et al. 2020) and improve the accuracy of the Project's mortality estimates.

Acoustically triggered smart curtailment: the SMART system's built-in call analysis capability allows for WTG operation to be paused in response to defined microbat call parameters and activity levels (Wildlife Acoustics 2025). This technology has been successfully deployed in Europe and the United Kingdom (Wildlife Acoustics 2025) and Ark Energy proposes to contribute to its development here in Australia.

Where the results of carcass monitoring triggers and subsequent carcass searches identify a relationship between microbat call activity and confirmed fatalities, smart curtailment trials will be implemented. The specific details of the smart curtailment trial will be developed in consultation with State and/or Commonwealth agencies and other relevant parties, and implemented within the adaptive management framework of the Project BBAMP, however, will include the following example components:

- A defined total microbat and/or species-specific call activity trigger for the immediate pause in WTG operation

- A defined time period of microbat call absence or low activity threshold before re-instating WTG operation
- Carcass search to be undertaken within the defined search zone of the WTG as soon as possible following the acoustic curtailment trigger
- Documentation and review of the results of carcass searches, along with any relevant environmental, spatial or temporal factors at the time of the trigger.

The smart curtailment strategy will be implemented through the Project BBAMP and as such, an adaptive approach will be taken with the curtailment trigger metrics updated, should additional microbat call data or other relevant information (e.g. published scientific literature) suggest is necessary.

This initiative is voluntary and exceeds current requirements. The proposed research will help address knowledge gaps, especially for species where scientific data on turbine interactions are limited or absent.

This additional commitment demonstrates a precautionary approach and a broader effort by the proponent to support evidence-based impact assessments and adaptive management. The outcomes of this research are expected to inform ongoing monitoring and mitigation measures, such as those outlined in the BBAMP Framework (revised BDAR; ELA 2026b), and may contribute to improved conservation outcomes for bat species across the renewable energy sector.

Further information is required on the ancillary infrastructure, asset protection zones (APZs) and road upgrades required for the development. The full extent of the development footprint is currently unclear. Any additional impacts to native vegetation not assessed to date will increase the credit calculation for the project's biodiversity offsets.

RESPONSE

Section 3 of the Amendment Report (ELA 2026a) provides an overview of the amended Project Layout, including the WTG layout and location of the ancillary infrastructure. Additionally, further figures have been prepared within Appendix A of the Amendment Report to provide more clarity around the location of the ancillary infrastructure proposed. The full extent of the Development Footprint has been assessed as part of the revised BDAR which the exception of the areas deemed as inaccessible (southern transmission line and access roads) (ELA 2026b)

There are inaccuracies in the vegetation classification, stratification and mapping. These inaccuracies have the potential to affect the biodiversity offset credit calculation for the project.

RESPONSE

Section 3 of the revised BDAR (ELA 2026b) provides a description and detail of how PCTs were selected within the Development Corridor, considering various attributes including Interim Biogeographic Regionalisation of Australia (IBRA), IBRA subregion, vegetation formation and dominant canopy species. Once a short list of possible PCTs was established, further consideration of plot data including dominant species in each stratum and relative abundance, community composition, PCT descriptions in the OEH Vegetation Information System (VIS) database, including soils and landscape position, was undertaken. Potential PCT options that were considered for the Project are listed in Table 4-7.

Table 4-7: Potential PCT's

Selected PCT ID	PCT Name	Other PCT Options
76	Western Grey Box tall grassy woodland on alluvial loam and clay soils in the NSW South Western Slopes and Riverina Bioregions	266, 281

Selected PCT ID	PCT Name	Other PCT Options
84	River Oak – Rough-barked Apple – red gum -box riparian tall woodland (wetland) of the Brigalow Belt South Bioregion and Nandewar Bioregion	281
266	White Box grassy Woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion	272
270	White Box – Tumbledown Reg Gum – Long-leaved Box shrub/grass woodland in fine-grained sediments of the upper Macquarie River Gorge, NSW central western slopes.	272
272	White Box – Black Cypress Pine – red gum +/- Mugga Ironbark shrubby woodland in hills of the NSW central western slopes	266
274	White Box – Rough-barked Apple alluvial woodland of the NSW central western slopes including in the Mudgee Region	281
277	Blakely's Red Gum – Yellow Box grassy tall woodland on the NSW South Western Slopes Bioregion	281, 276
281	Rough-barked Apple – red gum – Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South Western Slopes Bioregion and Brigalow Belt South Bioregion	277, 276
287	Long-leaved Box – red box – Red Stringybark mixed open forest on hills and hillslopes in the NSW South Western Slopes Bioregion	321
312	Yellow Box grassy tall woodland on valley flats in the upper slopes of the NSW South Western Slopes Bioregion and South Eastern Highlands Bioregion	277, 281
331	Red Stringybark woodland on hillslopes, northern NSW South Western Slopes Bioregion	321 323, 1095
461	Tumbledown Gum woodland on hills in the northern NSW South Western Slopes Bioregion and southern Brigalow Belt South Bioregion	270, 272

Twelve (12) PCTs were identified within the Development Corridor. Of these, seven (7) were associated with TECs listed under the BC Act and/or EPBC Act. The Development Footprint (730.73 ha Option A & Option B) consists of 682 ha of native vegetation with approximately 89% (606.6 ha) within non-TEC PCTs.

To further split the twelve (12) PCTs into vegetation zones, rapid data, together with field inspections and aerial imagery were used to assist in the delineation of vegetation zones. Of the twelve (12) PCTs identified within the Development Corridor, seven (7) of these PCTs were stratified into additional zones based on their presence or absence of trees and differences in species composition. The factors used to assign a condition class to each PCT are described in Table 4.5 of the revised BDAR (ELA 2026b). Areas of DNG also included areas with scattered trees.

Further clarity is required on the areas within the project which were not accessible during surveys. The assumptions applied to these areas should be precautionary and conservative to ensure the development footprint accurately captures the likely upper quantum of impact.

RESPONSE

Since the submission of the EIS, the Development Footprint has reduced, and additional surveys have been conducted significantly reducing the inaccessible areas to approximately 7 ha, which is 0.9% of the total Development Footprint.

For areas that were inaccessible for surveys due to slope or safety concerns, assumptions have been made to ensure comprehensive impact assessment and to conservatively account for their potential ecological value. All inaccessible areas associated with a TEC have been assumed to meet the listing criteria for the TEC. Any areas that required additional plots were assumed to be a benchmark condition, representing the highest ecological quality and habitat value for the associated PCTs (Table 4-8 and Figure 4-2). Inaccessible areas are assumed to provide habitat for species credit species and offset credits have been calculated for these species by making these conservative assumptions, the Project has estimated the maximum potential impacts to biodiversity.

Table 4-8: Location of PCTs that were inaccessible within the Development Footprint (as of 2026)

PCT	Condition	Location	Area (ha) 2024	Area (ha) 2026
PCT 76	DNG	Transmission Line	0.02	0
PCT 84	DNG	Transmission Line	0.28	0
PCT 84	Good	Transmission Line	0.47	0
PCT 266	DNG	Transmission Line	1.01	0
PCT 266	Good	Transmission Line	0.48	0.34
PCT 272	DNG	Transmission Line and OH Reticulation	2.84	0.80
		Wind Farm	3.52	0
PCT 272	Good	Transmission Line and OH Reticulation	10.66	3.80
		Wind Farm	14.60	0
PCT 287	DNG	Transmission Line and OH Reticulation	0.91	0.30
		Wind Farm	1.87	0
PCT 287	Good	Transmission Line	0.26	0.20
		Wind Farm	24.22	0
PCT 331	Good	Transmission Line	1.69	1.50
Tracks / drainage		Transmission Line and OH Reticulation	0.92	0.05
		Wind Farm	0.27	0
TOTAL			64 ha	7 ha

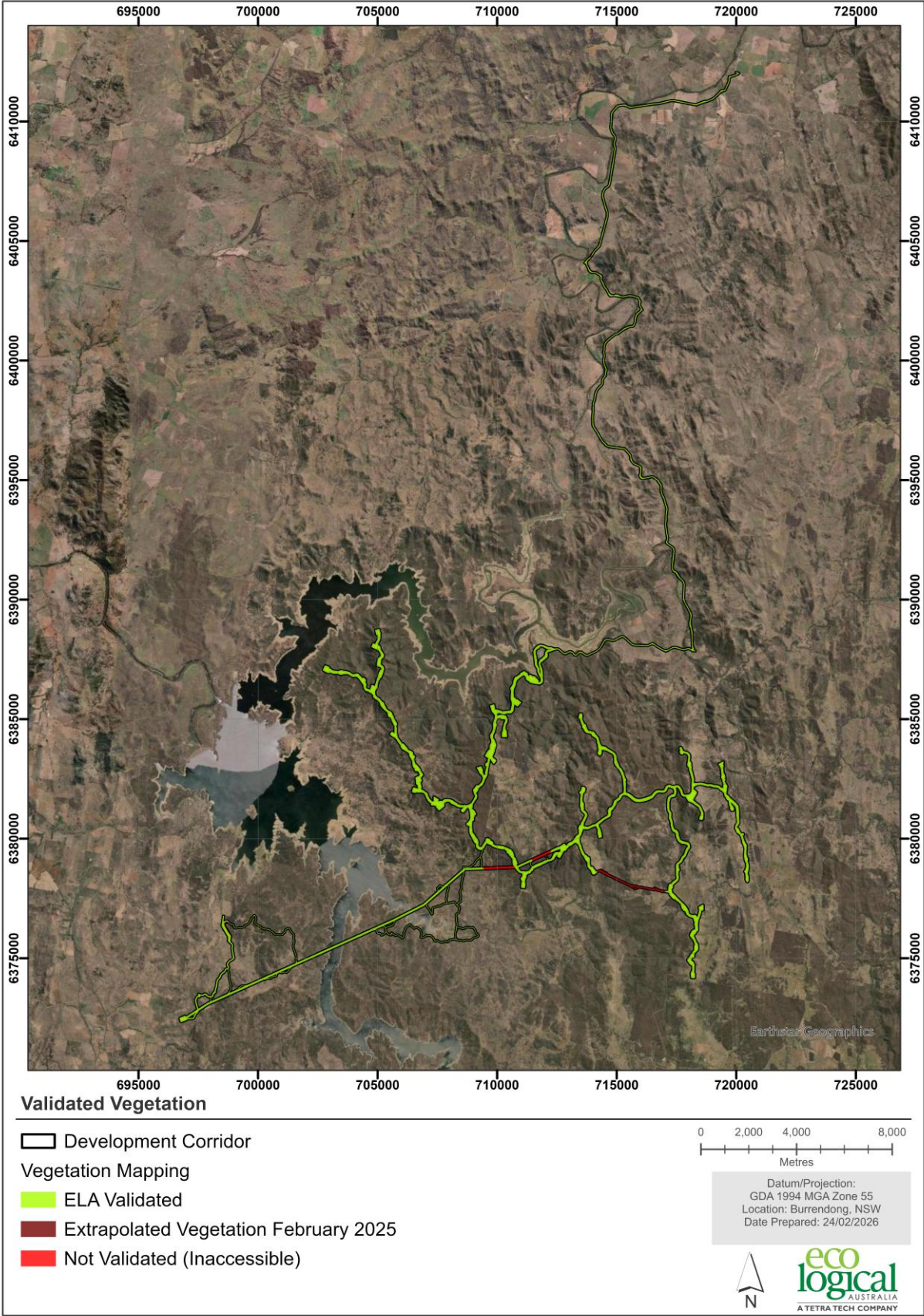


Figure 4-2: Inaccessible areas

The MNES assessment is not compliant with Commonwealth guidelines and the BDAR does not provide the information required for BCS to complete a Bilateral Assessment.

RESPONSE

Matters of National Environmental Significance (MNES) have been assessed within the revised BDAR (ELA 2026b) and Assessments of Significance to support the assessment of potential impacts upon MNES have been included as Appendix O of the revised BDAR (Appendix F.1 of the Amendment Report ELA 2026b). MNES Assessments of Significance have been completed for:

- White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland
- Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia
- Key's Matchstick Grasshopper (*Keyacris scurra*)
- White-throated Needletail (*Hirundapus caudacutus*)
- Regent Honeyeater (*Anthochaera phrygia*), unlikely to have significant impact
- *Euphrasia arguta*, & *Prasophyllum sp.* Wybong, unlikely to significantly impact upon the species. Surveys have since been completed for *E. arguta* which did not record the species.
- Tumut Grevillea (*Grevillea wilkinsonii*), unlikely to have significant impact
- Koala (*Phascolarctos cinereus*), unlikely to have significant impact
- Small Purple-pea (*Swainsona recta*), *Prasophyllum petilum* & *Tylophora linearis*, unlikely to have significant impact. However additional surveys will be conducted.
- Pink-tailed Legless-Lizard (*Aprasia parapulchella*), unlikely to have significant impact
- Fork-tailed Swift (*Apus pacificus*), unlikely to have significant impact
- Large-eared Pied Bat (*Chalinolobus dwyeri*), unlikely to have significant impact
- Brown Treecreeper (*Climacteris picumnus*), unlikely to have significant impact
- Bluegrass (*Dichanthium setosum*), unlikely to have significant impact
- Clandulla Geebung (*Persoonia marginata*), unlikely to have significant impact
- Grey Falcon (*Falco hypoleucos*), unlikely to have significant impact
- Painted Honeyeater (*Grantiella picta*), no significant impacts
- Hooded Robin (*Melanodryas cucullata cucullata*), unlikely to have significant impact
- Corben's Long-eared Bat (*Nyctophilus corbeni*), unlikely to have significant impact
- Superb Parrot (*Polytelis swainsonii*), unlikely to have significant impact
- Diamond Firetail (*Stagonopleura guttata*), unlikely to have significant impact
- Fork-tailed Swift (*Apus pacificus*), unlikely to have significant impact
- White-throated Needletail (*Hirundapus caudacutus*), unlikely to have significant impact

Section 10.1 of the revised BDAR (ELA 2026b) provides the required information for BCS to complete a Bilateral Assessment. This information includes a summary of the impact assessment undertaken for MNES, and includes, but is not limited to:

- Landscape Context of the MNES
- EPBC Act Listed Threatened Species and Communities
- Avoidance, Minimisation, Mitigation and Management
- Impact Assessment, including identification of MNES, the nature and consequence of impact (direct and indirect), duration of impact (e.g. construction, operation, life of project), quantum of impact, consequence of impact (local, state & national scales), and impacts requiring offsets (significant or not)
- Offsets.

The method by which credits have been calculated and submitted via the BAM-C needs to be revised and separate BAM-C cases should be created for each project stage and transmission line option.

RESPONSE

A single 'Parent' BAM-C case consisting of two 'child' cases (regarding the South Eastern Highlands (SEH) and Inland Slopes) will be submitted to consolidate total impacts across all sections of the Project.

A consolidated total impact area Parent case has been submitted, as well as two child cases (one for the SEH and Inland Slopes) in the BAM-C. The BAM-C has been updated as part of the revised BDAR (ELA 2026).

Excluding candidate species from the BAM-C is not in accordance with the BAM, potentially resulting in inaccurate species credit obligations.

RESPONSE

Species credit species have been excluded from the BAM-C where the Project Site is located outside of the species credit species geographical distribution or where the Project Site is not mapped as an important area for a particular species credit species or where habitat constraints have not been met. Species that have been excluded include:

- *Acacia phasmoides* (Phantom Wattle) – species removed due to geographical constraints
- *Ammobium craspedioides* (Yass Daisy) – species removed due to geographical constraints
- Regent Honeyeater – not mapped as an important area
- *Austrostipa wakoolica* (Spear Grass) – species removed due to geographical constraints as the species occurs west of Cowra
- *Caladenia arenaria* (Sand-hill Spider Orchid) – species removed due to lack of sandy soils associated with this species. Within the Project Site, PCT 76 occurred on clay loams of alluvial origin but not sandy soils
- *Crinia sloanei* (Sloane's Froglet) – species removed due to no suitable habitat within Development Corridor. Removed from assessment due to habitat constraints
- *Delma impar* (Striped Legless Lizard) – species removed due to geographical constraints. Project Site is located north of the Mid-Western Highway and species is found south of the Mid-Western Hwy
- *Hoplocephalus bitorquatus* (Pale-headed Snake) – habitat is regarded as degraded. There were no suitable hollow bearing trees in close proximity to rocky outcrops associated with PCT 84
- *Lathamus discolor* (Swift Parrot (Breeding)) – species removed due to geographical constraints
- *Litoria booroolongensis* (Booroolong Frog) - lack of suitable habitat on site due to lack of permanent flowing water within the Development Corridor. Removed due to habitat constraints
- *Miniopterus orianae oceanis* (Large Bent-winged bat) (Breeding) – species removed due to habitat constraints
- *Myotis Macropus* (Southern Myotis) - Surveys not undertaken as this species was recently added to BAMC after initial submission of BDAR. However, ultrasonic detectors were deployed across the site including areas adjacent to water and the species was not recorded
- *Petaurus norfolcensis* – endangered population (Squirrel Glider in the Wagga Wagga LGA) – removed due to geographical constraints
- *Petrogale penicillata* (Brush-tailed Rock Wallaby) – lack of suitable habitat. No rocky/ boulder habitat considered suitable for this species. Habitat constraints not met
- *Prasophyllum sp*, Wybong - the NSW herbarium considers *P. petilum* and Wybong to be the same species and the two species are treated as one for NSW regulatory purposes with the distinction maintained under Commonwealth legislation

- *Pteropus poliocephalus* (Grey-headed Flying Fox) (Breeding) – breeding camps are not present within the Project Site
- *Synemon plana* (Golden Sun Moth) – species removed due to geographical constraints
- *Vespadelus troughtoni* (Eastern Cave Bat) – species removed due to habitat constraints
- *Zieria obcordata* (Granite Zieria) – species removed due to habitat constraints.

There is a lack of accurate data to inform any offset calculation for prescribed impacts due to bird and bat turbine strike.

RESPONSE

The impacts to bird and bat turbine strike have not been included within the BAM-C. Any offset will be linked to the operational phase of the Project and therefore it is difficult to predict the prescribed impact at this stage. Additional BBUS surveys have been completed at 16 locations across the wind farm area as well as the deployment of Anabat devices in the same locations since the submission of the EIS. The BBUS surveys have been undertaken quarterly between May 2024 and May 2025. Further details are provided within Table 4-4 of the revised BDAR, refer to Appendix F of the Amendment Report (ELA 2026a).

Whilst, not considered within the BAM-C, the prescribed impacts to birds and bats because of the Project has been considered within the revised BDAR, refer to Section 8.5.5; Appendix F of the Amendment Report (ELA 2026a) The framework of the BBAMP is provided in Table 7-10 of Appendix F of the Amendment Report (ELA 2026a). The BBAMP will outline specific measures to minimise birds and bat strike as well as trigger levels for further investigations of the potential impact of the Project on specific bird or bat species or populations.

The BDAR has not been certified within legislated timeframes.

RESPONSE

The revised BDAR has been prepared and submitted in line with the legislative timeframes.

In particular the BAM-C was drafted on 20 November 2024 and finalised upon submission of this Submissions Report.

4.1.2. Civil Aviation Safety Authority

Except for Recommendation 8 'Lighting of WTGs', CASA agrees with the Recommendations at Section 11 of the Aviation Impact Assessment. Contrary to Recommendation 8, CASA considers the proposed wind farm will be a hazard to aviation safety and *recommends that the wind farm is obstacle lit* with steady medium-low intensity red obstacle lighting in accordance with the National Airports Safeguarding Framework Guideline D 'Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation' National Airports Safeguarding Framework Principles and Guidelines (infrastructure.gov.au) and section 9.31 of Part 139 Aerodromes Manual of Standards Part 139 (Aerodromes) Manual of Standards 2019 (legislation.gov.au).

International standards require, and the NASF guideline recommends, 2,000 candela lighting intensity. CASA recommends that 200 candela as a minimum intensity lighting would suffice. The obstacle lighting should be monitored (preferably remotely) to alert the wind farm operator of any outage. The lighting system should have a failsafe mode to ensure that at least some of the obstacle lights remain on during an outage, and a management system developed to ensure any outages are corrected promptly. CASA is prepared to review a lighting plan that indicates which turbines are proposed to be lit.

As the Aviation Safety regulator, CASA does not consider the visual impact of obstacle lighting on neighbours / homesteads. However, there are mitigations for visual impact such as baffling or shielding in downward

directions and intensity control (as described in the Aviation Impact Assessment Table 13 'Effect of obstacle lighting on neighbours'). Also, Aircraft Detection Lighting Systems are described in the United States Federal Aviation Administration Advisory Circular AC70/7460-1L

Aircraft are restricted to a height of 500 ft above the highest point of the terrain and any object on it during the day and a height of 1,000 ft above the highest obstacle at night. The turbines will reach a height of 820 ft above ground level. While pilots are required to fly no lower than 1000 ft above the highest obstacle at night, a pilot could be off track or at a low level due to weather related events, stress from weather conditions, unawareness of a wind farm, navigation difficulties and other circumstances including controllability issues and the pilot exceeding limits. Pilots could be required to navigate around the project site in low cloud conditions. Also, in future there is a possibility of night aerial firefighting operations using night vision apparatus. The charting of a wind farm is a mitigator but does not eliminate the risk to aircraft.

Further to Recommendation 11, and as recommended by the Aerial Application Association of Australia, CASA recommends that the following Australian Standard be considered regarding overhead transmission lines:

AS 3891.2, Air navigation — Cables and their supporting structures — Marking and safety requirements, Part 2: Low-level aviation operations.

Further to The Summary of Key Recommendations on page xii of the AIA the proponent or Aviation Consultant should engage with Airservices Australia (flight procedure designer for Mudgee Aerodrome) to update the RNP RWY 04 instrument approach procedure for Mudgee Aerodrome by raising the minimum segment altitude from 3,900 ft AMSL to 4,500 ft AMSL. There should be no changes are to instrument procedures without the permission of the airport operator. (Refer to AIA Introduction paragraph 1.3). Also, Section 5 Table 2 advises 'We request that you consult with both Mudgee Airport along with aviation operators there to ensure that all stakeholders fully understand the proposed changes that are required to accommodate the Wind Farm.' The AIA (paragraph 6.6) advises that the Mid-Western Regional Council has not objected to the changes.

RESPONSE

Following the recommendation by CASA to provide obstacle lighting, the Proponent will implement WTG lighting with a minimum intensity of 200 candela with downward shielding so that no more than 5% of the nominal light intensity is emitted at or below 5° below horizontal, reducing potential light impacts to dwellings. A lighting plan showing which WTGs will be lit has been prepared by Aviation Projects for the Project and can be found in Appendix I of the Amendment Report (Aviation Project 2024; ELA 2026a). The obstacle lighting being proposed to be implemented will be consistent with National Airports Safeguarding Framework (NASF) guideline D and Part 139 MOS 2019.

The risk posed to aircraft flying at the designated heights of 500 ft during the day and 1,000 ft during the night, as well as aircraft required to undertake night aerial firefighting operations is noted. As discussed in the Aviation Impact Assessment (AIA) prepared by Aviation Projects (Aviation Projects 2023), mitigation measures such as night lighting will be implemented to help mitigate risks associated with aerial operations. The Proponent will maintain contact with CASA to communicate measures to further reduce potential aerial risks where applicable.

Additionally, the Proponent will implement the requirements of AS 3891.2, Air navigation — Cables and their supporting structures — Marking and safety requirements, Part 2: Low-level aviation operations in relation to overhead transmission lines during design and construction of the Project.

Further consultation will be undertaken with both Airservices Australia and Mudgee Aerodrome regarding updating the RNP RWY 04 instrument approach procedure in order to increase the minimum segment altitude to 4,500 ft, post approval. Additional mitigation measures for the Project are considered in more detail in Section 5.4.1 of this Submissions report and within the Amendment Report (ELA 2026a).

During the preparation of the Landscape and Visual Impact Assessment (LVIA) (MLA 2023) submitted as part of the EIS, AHL was not a requirement and therefore was not assessed. However, an addendum report to the LVIA has been prepared which considers the inclusion of AHL in line with the requirements specified by CASA, consistent with NASF guideline D and Part 139 MOS 2019 (Appendix D of the Amendment Report (Moir Studio 2026; ELA 2026)). The updates to the LVIA considers the Visual Assessment Bulletin (2016) and the worst-case lighting scenario of 39 of 70 WTGs being lit with AHL at the hub height. Considering a distance of 4,900 m as a worst case scenario for AHL visibility, it is noted there are limited opportunities to view WTGs with AHL from publicly accessible land. Considering the reduction of lighting strength to 200 candela, existing topography and vegetation, it is determined that the visual impact resulting from AHL is negligible and further assessment is not required.

In regard to the potential visual impact on nearby dwellings, the Visual Assessment Bulletin states the Proponent must *“Shield all AHL within two kilometres from any dwellings. Avoid strobe lighting.”* There are no dwellings within two (2) kilometres of a WTG. The nearest dwelling with visibility of a WTG hub is dwelling T7-2, located 3.25 km from the nearest WTG and therefore the AHL presents limited opportunities for visual impacts on surrounding dwellings (Moir Studio 2026).

4.1.3. Crown Lands

The Department of Planning and Environment – Crown Lands have reviewed the Burrendong Wind Farm EIS proposal. As all issues have been identified and addressed in the Burrendong Wind Farm EIS report and all of Crown Lands’ comments have been addressed in previous requests for advice, Crown Lands has no further comments for this proposal at this time.

RESPONSE

The DPE – Crown Lands comment is noted.

4.1.4. Department of Planning and Environment: Hazards

The Department has reviewed the Blade throw assessment contained in Section 6.7.2.6 of the EIS. The blade throw assessment has considered residents located at K11-1 and O17-1 as these are located within 1,500 metres of a WTG. However, it is noted that S11-1 and S12-1 are also indicated as being within 1,500 metres of a WTG, but the impact on these locations has not been included in the assessment nor provided any clarification on the future uses for these two locations.

The Department has noticed that substantial portions of the blade throw assessment are copied from the EIS for Bango Wind Farm (2016) and various resources from International Studies were directly adopted in the assessment. This approach is inappropriate as it is not site-specific to the proposed development. For example, the WTGs from EDP Renewables (2005) were up to 125 metres and powered up to 3 MW. This scale is substantially smaller than those for the proposed development. Similarly, The Chief Medical Officer of Health (CMOH) Ontario (2010) mainly dealt with setbacks for noise, but only provided general comments on the blade throw risk without quantification of the risks. Likewise, the research report RR968 (2013) presents a methodology for establishing the blade throw risks and undertook a case study, but the case study is specific to the location (Glasgow) and the assumed wind turbine parameters (125 metres and 2.3 MW) which are not applicable to this project.

The Department also noted the unconventional description of probabilities/frequencies adopted in the blade throw assessment. These are shown as percentage per year and maybe misleading. The Department is uncertain whether the reported number of 0.000000009% per year is an error or it means 9×10^{-11} pa. It is recommended to adopt the scientific notation when reporting the probabilities/frequencies.

There is presently no criterion for the risks of blade throw risks from WTG in NSW. However, in assessing the risks for residential uses, the Department is guided by the individual risk criterion for residential uses being 1

fatality per million per year (1×10^{-6} pa), as presented in the Department's Hazardous Industry Advisory Paper No. 4, 'Risk Criteria for Land Use Safety Planning' (HIPAP No. 4). Where the risks to residents are found to be below a fatality risk of 1×10^{-6} pa, the Department considers the risk as low and broadly acceptable.

Notwithstanding the concerns as highlighted above, the assessment found that the risk of blade throw to the receivers within 1,500 metres was 0.0004%. The Department highlights that this equates to a fatality frequency of 4×10^{-6} p.a which is four times higher than the residential risk criteria in HIPAP No. 4. As such, the Department would consider this fatality frequency to be broadly unacceptable for residential uses.

Given the above, the Department requests the Applicant to update the PHA. The Applicant may consider referencing the Netherlands 'Wind Turbine Risk Zoning Handbook' methodology and resubmit as part of the Response To Submissions (RTS).

Given the above the Department requests the following:

1. Provide Information of the intended future use of locations S11-1 and S12-1; and
2. Re-assessment of the risks of blade throw including surrounding associated and non-associated residents.

RESPONSE

S11-1 and S12-1

There is no planned change to the use of S11-1 and S12-1 as residential dwellings. The Proponent has entered into an agreement with the landholders associated with S11-1 and S12-1 and are considered 'Involved Dwellings'.

Blade Throw Assessment

The risk of blade throw has been re-assessed by Middleton Group which specifically considers the Project and the surrounding associated and non-associated dwellings. The Blade Throw Assessment (Middleton Group 2026) provides an estimate of the risk to human life associated with a blade failure event based on likelihood of humans occupying space within the potential impact zone at the time of blade failure.

It has been calculated that the maximum impacted blade drop radius is 350 m and the maximum impacted fragment drop radius is 941 m. Based on this, two (2) dwellings S11-1 and S12-1 are situated within the calculated fragment drop radius.

When considering the turbine dimensions and wind data, it is estimated that the total probability is 0.93×10^{-6} of a blade failure causing a fatality at Burrendong Wind Farm. Thus, the likelihood of such an event occurring is below the broadly acceptable risk under the NSW Planning's HIPAP4 (Department of Planning, 2011).

The full updated Blade Throw Assessment can be found in Appendix J of the Amendment Report (Middleton Group 2026; ELA 2026a).

4.1.5. Department of Planning and Environment: Water

The proponent should clarify the ability to obtain a secure water supply to meet the potable and non-potable demands for construction and operation of the project. This is to include relevant agreements where required and to demonstrate sufficient water entitlements can be acquired where necessary.

RESPONSE

The revised surface water impact assessment is provided in Appendix M of the Amendment Report (ELA 2026a). The updated assessment has identified potential water supply points. Sources of water nearby include the Macquarie River, Cudgegong River and Burrendong Dam. The revised groundwater impact assessment has been updated to consider this, Appendix N of the Amendment Report (ELA 2026a).

Full agreements will be sought post-approval and prior to the commencement of construction.

If water is to be sourced from a currently unauthorised source and/or where additional water take infrastructure is required (e.g. a river pump, dam, and/or a bore), an impact assessment of this infrastructure development and water take will be required.

RESPONSE

Water will not be sourced from an unauthorised source.

If groundwater is intercepted during the construction phase of the Project, a water access licence with sufficient entitlement to account for the groundwater take must be obtained, unless an exemption applies. Water supply work approval will also be required from DPE Water for any water take infrastructure, e.g., a pump or bore, where these have not been identified and assessed as part of the Project's SSD assessment.

RESPONSE

It is noted that a water access license will be required if groundwater is encountered during construction.

Whilst potential impacts to groundwater are considered minimal, the low density of available bore information results in a higher level of interpolation and hence uncertainty at the local scale.

Post approval geotechnical assessment will provide confirmation on groundwater levels and quality. This evaluation will be completed prior to commencing construction activities that involve excavations greater than 5 m depth. However, it is important to note that no impacts to groundwater are predicted at the WTG sites where excavations are greatest.

All works within waterfront land should be consistent with the *Guidelines for Controlled Activities on Waterfront Land*.

RESPONSE

As noted in the EIS (ELA 2023a), all works within waterfront land will be undertaken in accordance with the *Guidelines for Controlled Activities on Waterfront Land*.

The Proponent should:

- Confirm the quantity of potable water (e.g. amenities, concrete batching) and any water for construction (e.g. dust suppression) to be sourced from town water supplies (either directly or by water carting), and from which town water supplies;
- Confirm if non-potable water is to be sourced from water storages, which water storages and the amount to be extracted from each water storage;
- Demonstrate that the relevant Local Water Utilities are satisfied there is capacity within the relevant town water systems to accommodate the proposed water demands without impacting existing services;
- Confirm water carting arrangements by providing detail that there are carting providers available to cart water for the construction phase of the project;
- Assess the cumulative impacts to town water supplies due to this project and other renewable energy projects relying on the same town water supplies sources; and
- Confirm with the relevant Local Water Utility, the financial impact of the Project and potential for additional costs (from infrastructure upgrades or operational activities) to water rate payers in either the Dubbo or Midwestern Local Government Area.

RESPONSE

The revised surface water impact assessment as per Appendix M of the Amendment Report (ELA 2026a). A summary of the water requirements and sources are noted below:

- It is anticipated that the construction of the Project will require between 850 (wet year) and 1,400 (dry year) ML/year for dust suppression needs
- Construction is expected to take between 18 months and 2 years. Over this period, therefore, it is estimated that between 2.6 and 3.8 GL water will be required, not including requirements for the TWAF
- The TWAF estimated water requirement will be approximately 33 kilolitres per days based upon a 225 person camp therefore, it is estimated that between 18.4 and 24.5 ML water will be required during the operation of the TWAF.

The Proponent will not be using town water supplies, therefore the quantity of potable water to be sourced from town supplied is 0 ML. Given this, consultation has not been undertaken with Local Water Utilities regarding capacity within the relevant town water systems to accommodate the proposed water demands without impacting existing services. No cumulative assessment on town water supplies has been undertaken given that the Project will not be impacting upon town water supply for construction and operation.

Potential water supplies have been identified within the updated assessment including water being sourced from the nearby Macquarie River, Cudgegong River, Burrendong Dam and catchment farm dams. If any of these sources are utilised, the appropriate licences would be sought. Alternatively, registered groundwater bores could be utilised. The revised groundwater impact assessment has been updated to consider this, Appendix N of the Amendment Report (ELA 2026a).

Water supply for the TWAF will be via bulk water deliveries via tanker trucks from approved off-site sources, which will be determined during the detailed design phase of the Project, with potential options including licensed extraction from the Macquarie River, Cudgegong River, Burrendong Dam, or other approved water supply operators in the region. Delivered water will be stored in dedicated water storage tanks strategically located across the TWAF to support daily operational demands. Storage capacity will be designed to accommodate fluctuations in water use and to ensure uninterrupted supply during peak construction periods (Barnson 2025).

The Proponent should:

- Confirm demand for sewage management both during the construction and operational phases;
- Confirm with the relevant Local Water Utility which sewerage system will receive and manage the sewage load and demonstrate the chosen sewerage system can manage any increases in demand;
- Confirm the method of disposal/transfer of sewage, effluent and/or septage, including the ability of liquid waste contractors, during both the construction and operational phases; and
- Confirm with the relevant Local Water Utility, the financial impact of the Project, and potential for additional costs (from infrastructure upgrades or operational activities) to rate payers in either the Dubbo or Mid-Western Local Government Areas

RESPONSE

As discussed in Section 3.2.39 of the EIS (ELA 2023a), an approved septic system or composting system will be installed to treat minor quantities of wastewater, subject to securing the relevant authorisation.

The Construction and Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) and any relevant associated sub-plans will outline the method of disposal/ transfer of sewage, effluent and/or septage, including the ability of liquid waste contractors, during both the construction and operational phases. Both the CEMP and the OEMP will require consultant and agreement with DRC and MWRC.

The TWAF wastewater/sewage will be treated on-site using a self-contained wastewater/sewage treatment plant. The system will treat both greywater and blackwater in accordance with Environmental Protection Authority (EPA) and NSW Health requirements. The Proponent will prepare a separate Section 68 application in accordance with the *Local Government Act 1993*, proposing the installation of an on-site wastewater treatment system that meets relevant regulatory requirements (Barnson 2025).

4.1.6. Department of Primary Industries: Agriculture

It is noted the EIS proposes actions for returning the land capability to pre-existing agricultural capacity, which is supported. It is NSW DPI's position that underground infrastructure be removed to 500 mm depth to enable recommencement of agricultural activities where the risk of local soil disturbance and erosion is manageable.

RESPONSE

The DPI: Agriculture's comment is noted. As described in the EIS (ELA 2023a), the Project will remove all Project infrastructure at a depth up to 500 mm, leaving inert and stable cables greater than 500 mm in depth in situ.

4.1.7. Department of Primary Industries: Fisheries

DPI Fisheries has reviewed the environmental impact statement and provide the following recommendations for conditions of consent:

- **Watercourse Crossings:** The construction of all watercourse crossings or services through *Key Fish Habitat* will be in accordance with the DPI document *Policy and Guidelines for Fish Habitat Conservation and Management* (update 2013).
- **Riparian Buffer Zone:** DPI Fisheries policy advocates the use of terrestrial riparian buffer zones adjacent to areas of *Key Fish Habitat* as per the *Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013)* available on the Department's website in order to maintain the riparian buffer zone and limit disturbance and susceptibility to bed or bank erosion.

RESPONSE

The Proponent commits to implementation of both recommendations made by DPI Fisheries.

As discussed in the EIS (ELA 2023a), the Project has sought to design a Development Footprint that avoids works and impacts close to or within waterways wherever practicable in line with the hierarchy of avoid, minimise, mitigate and offset impacts. This will be achieved by locating Project infrastructure, such as WTGs and access tracks, outside of riparian corridors and watercourses.

However, several waterway crossings will be required to facilitate Project Site access, internal access roads and the input of electrical cabling to service the Project. Waterway crossings will be designed to minimise impacts on stream stability and fish passage, and will be designed with reference to relevant guidelines and policies, including:

- *Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings* (Fairfull & Witheridge 2003)
- *Policy and Guidelines for Fish Habitat Conservation and Management* (Fairfull 2013).

Watercourse Crossings: It is noted that the Project proposes crossings across watercourses that have been mapped as Key Fish Habitat (KFH) by DPE Fisheries as shown in Figure 6-62 of the EIS (ELA 2023a). The *Policy and Guidelines for Fish Habitat Conservation and Management* (2013) update will be utilised during the detailed design phase when considering watercourse crossings and services through KFH, such as designing waterway crossings to minimise impacts on stream stability and potential fish passage. The construction of watercourse crossings and services will also be conducted in accordance with the *Policy and Guidelines for Fish Habitat Conservation and Management* as requested by the Department.

Riparian Buffer Zone: The Proponent will apply the recommendations from the Department regarding terrestrial riparian buffer zones adjacent to areas of KFH wherever possible, in line with the *Policy and Guidelines for Fish Habitat Conservation and Management*.

Key Fish Habitat: During the detailed design phase, consultation will be undertaken with DPI Fisheries in order to determine if any of the proposed waterway crossings require consideration of fish passage in accordance with the *Policy and Guidelines for Fish Habitat Conservation and Management* (update 2013). Additionally, should any large woody debris or boulders require removal within the footprint of waterway crossings, these would be reinstated into the waterway upon the completion of construction works.

4.1.1.8. Environment Protection Authority

Noise

The EPA requests that operational noise limits for the windfarm are updated to reflect a 24-hour period rather than day/night, in line with the Wind Energy: Noise Assessment Bulletin

RESPONSE

MDA acknowledges the request by the EPA to update noise limits to reflect a 24-hour period rather than day/night in line with the Noise Assessment Bulletin.

However, a review of the measured background noise data collected as part of the Background Noise Assessment Report indicated that there were distinct diurnal trends, with the night period featuring typically high wind shear, which resulted in low background noise levels measured during elevated hub height wind speeds. This is due to the impact of wind shear on noise measurements, with higher wind shear occurring at higher wind speeds at hub height and therefore generating more noise relative to the background environment. Ultimately this can have the effect of skewing the relative background noise levels during period of high hub height wind speeds. This would not be typical in the absence of prevalent wind shear conditions.

The Wind Energy Noise Assessment Bulletin indicates that noise criteria, i.e. applicable noise limits, are established on the basis of a 24-hour period. This would mean that the trend of lower background noise levels occurring during the night period, when the wind shear condition typically occurs, would not be properly represented and the applicable noise limits would be skewed by the elevated day time noise levels.

Noise: The EPA requests that a sensitivity analysis of the modelled receiver height's impact on the predicted noise levels is provided to justify the use of 1.5 metre receiver heights.

RESPONSE

The justification for a 1.5 metre receiver height assessment was provided in Table 5 of the EIS Noise and Vibration Impact Assessment (NVIA) (MDA 2023). This justification noted that the UK Institute of Acoustics guidance refers to predictions made at receiver heights of 4 m. Predictions in Australia are generally based on a lower prediction height of 1.5 m which results in lower noise levels. However, importantly, predictions in Australia do not generally subtract a margin recommended by the UK Institute of Acoustics guidance to account for differences between L_{Aeq} and L_{A90} noise levels. The magnitude of these differences is comparable and therefore balance each other out to provide similar predicted noise levels. This approach has been shown to be valid for predicting noise levels of wind farms expected to be measured using the L_{A90} parameter (as per the NSW Noise Assessment Bulletin).

Given the balancing of the UK Institute of Acoustics modifications, the predicted noise levels produced using the method chosen during the NVIA, being at a height of 1.5 m, are considered to be consistent with the UK Institute of Acoustics Good Practice Guide. This approach has been adopted on other NSW wind farm noise assessments submitted to the NSW Department of Planning, Industry and Environment (now DPHI) and previous versions of

the department by MDA and other acoustic consultants. The Department has not previously provided a technical challenge to this approach. As such, a sensitivity analysis has not been undertaken.

Noise: The planning department may wish to request that an assessment of reasonable and feasible mitigation is presented, and a draft noise management plan prepared to satisfy the SEARs

RESPONSE

A number of mitigation measures associated with various noise impacts were identified when preparing the noise and vibration impact assessment and included within the EIS (ELA 2023a). The mitigation measures have been updated since the preparation of the EIS and are presented in Appendix C of the Amendment Report, NV01 to NV08 are specific to noise impacts (ELA 2026a). These included measures to mitigate impacts associated with construction noise, operational noise and the implementation of a Noise Reduction Management Strategy. Specific determination of noise control strategies, noise mitigation and reasonable and feasible work practices would be developed during the detailed design phase once a detailed understanding of actual construction works is known.

Vibration and Blasting: The planning department may wish to request that any impacts associated with blasting (airblast overpressure and ground borne vibration) and construction vibration are identified, and reasonable and feasible mitigation is discussed where appropriate to satisfy the SEARs.

RESPONSE

Blasting has not been determined to be required for the Project, and it is not known which construction stages blasting may be required for, if any. However, we acknowledge that it is not uncommon for blasting to be required to prepare wind turbine foundations. The requirement, or otherwise, for blasting will not be known until such time as a main contractor is appointed, investigative ground works are conducted, and site-specific construction methods are established.

In the event that blasting is required to undertake the construction of the Project, likely for the foundations of WTG footings, it is expected that impacts will occur. Therefore, based on the assumption that blasting may be required and impacts to occur, mitigation measures have been proposed to reduce the potential impacts. They will be included within the NMP. The measures are provided in Table 4-9 below.

Table 4-9: Proposed mitigation for potential blast events

Mitigation Measure	Code
Ground Vibration: • Use of an appropriate charge mass design and loading • Application of an appropriate initiation sequence for each blast to minimise the possibility of hole interaction, i.e. avoid reinforcing effect and aim for a single hole initiation • Use of a ground vibration predictive model to estimate potential ground vibration levels to aide with the blast design	CNVIA001
Airblast: • Use of an appropriate charge mass design and avoid overcharging holes • Use of a suitable initiation sequence to avoid build-up in wavefront reinforcement, i.e. minimise the possibility of hole interaction • Undertake an alternative blast design around identified geological features to avoid face burst and excessive airblast emissions • Use of an appropriate quality stemming material and stemming height to enable correct confinement of explosive charges and therefore minimise airblast emissions	CNVIA002

Mitigation Measure	Code
• Maintain appropriate burden specification for the front row of holes (to avoid face burst) • Use of an appropriate pre-blast meteorological condition protocol to avoid blasting in unfavourable weather conditions • Use of an airblast predictive model to estimate potential overpressure levels to aide with the design of blasts	
Flyrock: • Maintain appropriate burden specifications (according to design specifications) for the front row holes to avoid face bursts and related flyrock incidents • Use of an appropriate blast design around identified geological features (including geological faults, series of joints, dykes, etc.) to avoid potential flyrock incident • Use of an appropriate quality stemming material and stemming height (according to design specifications) to enable confinement of explosives to minimise the possibility of stemming ejection/flyrock incidents	CNVIA003

In the absence of specific information required in accordance with the *Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (Australian & New Zealand Environment and Conservation Council [ANZECC] 1990), as referred to in Section 3.5.3 of the EIS NVIA (MDA 2023), it is not possible to provide site specific airblast and ground vibration levels. Notwithstanding the above, to provide an indication of the effects of blasting, airblast overpressure levels and ground vibration levels have been estimated using the method detailed in AS 2187-2:2006 *Explosives—Storage, transport and use, Part 2: Use of explosives* (AS 2187-2), based on generic assumptions. It is not feasible to establish whether these assumptions are suitable for the Project Site until such time as a blasting plan is established and necessary site characteristics have been evaluated.

Airblast overpressure

Estimated airblast overpressure levels are presented in Figure 4-3 for a range of separating distances and maximum instantaneous charge weights. The estimated levels are based on confined blasthole charges and assumed site characteristics. The criteria specified in the *Guidelines Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (ANZECC 1990), set out in Section 3.5.3 of the EIS NVIA (MDA 2023), are also shown in Figure 4-3.

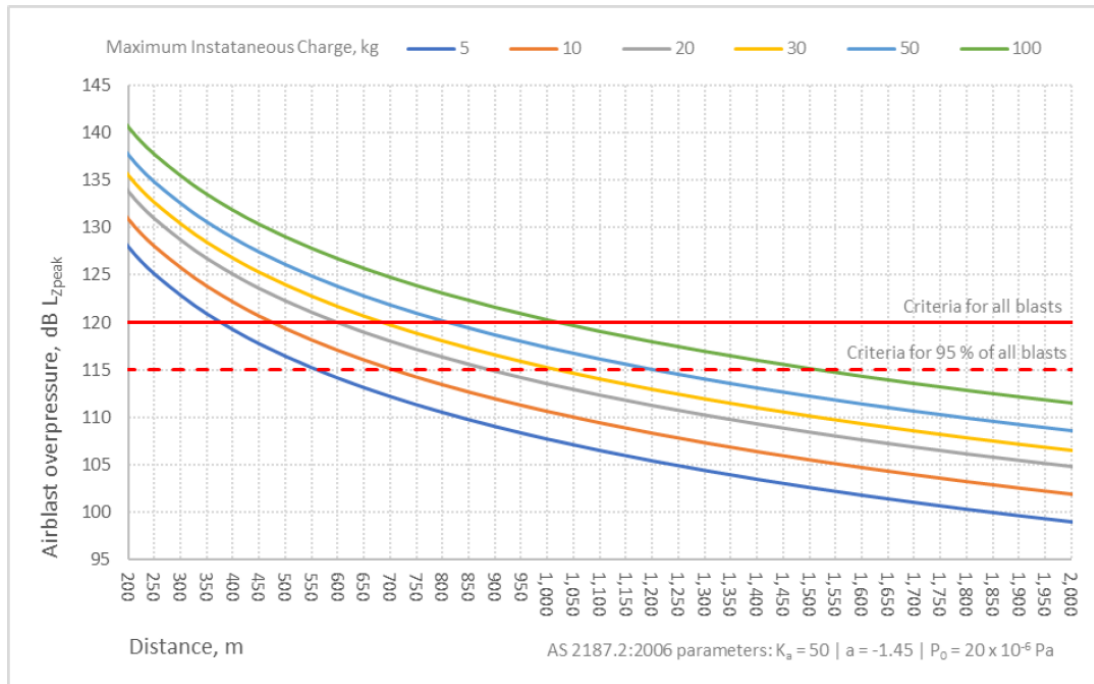


Figure 4-3: Estimated airblast overpressure level of $K_a = 50$ and $A = -1.45$

Ground Vibration

Estimated ground vibration levels are presented in Figure 4-4 for a range of separating distances and maximum instantaneous charge weights. The estimated levels are based on assumed site characteristics. The criteria specified in the *Guidelines Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (ANZECC 1990), set out in Section 3.5.3 of the EIS NVIA (MDA 2023), are also shown in Figure 4-4.

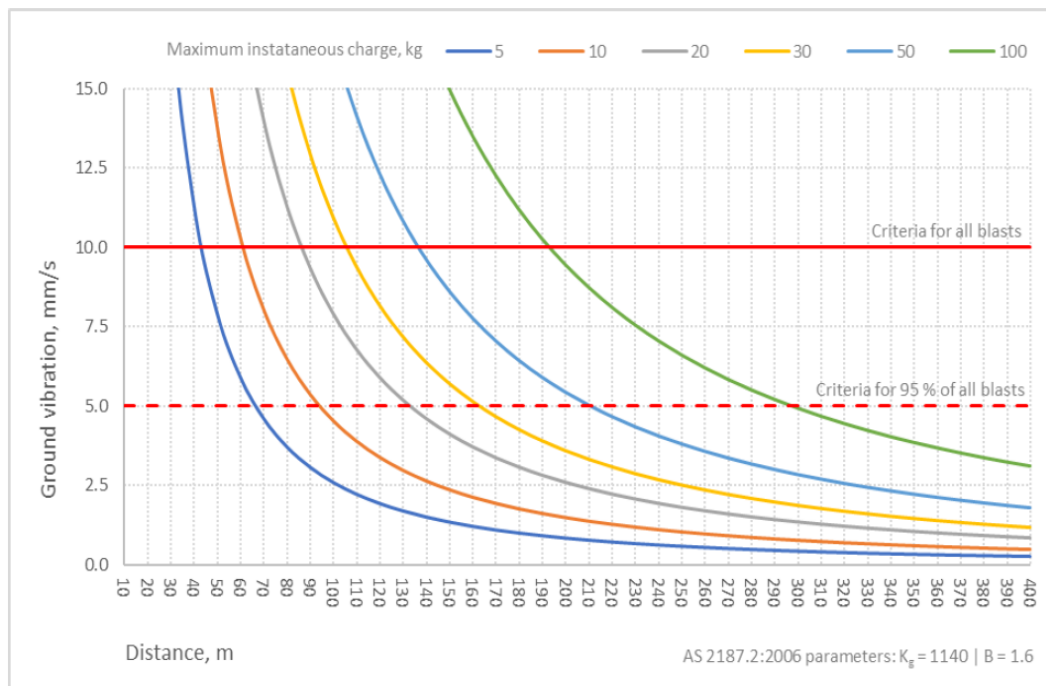


Figure 4-4: Estimated ground vibration levels for $K_g = 1140$ and $B = 1.6$

The minimum distances between receivers and wind turbine locations was shown in Table 29 of the EIS NVIA (MDA 2023) however it has been superseded by Table 1 Amendment Report Appendix E.1 (MDA2026) included below (Table 4-10). It is important to note that Q13-1 and R14-1 are now associated receivers, and that additional receivers have been assessed

Table 4-10: Receivers within 3 km of the proposed WTG (reproduced from Table 29 of the EIS (ELA 2023a))

Table 1: Receivers within 3 km of the proposed WTGs – GDA94/MGA Zone 55

Receiver	Easting, m	Northing, m	Terrain elevation, m	Distance to the nearest WTG, m	Nearest WTG
<i>Non-associated receiver</i>					
O17-1	714,157	6,377,163	428	1,427	39
R8-1	717,203	6,386,186	420	2,617	49
T8-1	718,998	6,386,243	397	2,919	49
U10-1	720,158	6,383,862	410	1,428	53
U11-1	720,468	6,382,956	397	1,071	53
U8-2	720,004	6,385,439	387	2,869	53
U9-1	719,970	6,384,513	395	1,961	53
U9-3	719,842	6,384,954	392	2,365	53
V11-2	721,480	6,383,289	418	2,130	53
V11-3	721,301	6,382,968	404	1,878	53
V13-1	721,599	6,380,843	763	1,630	57
W10-1	722,032	6,383,574	407	2,744	53
W10-2	722,193	6,383,739	421	2,954	53
W11-1	722,234	6,383,351	414	2,870	53
XW12-1	722,082	6,383,453	408	2,752	53
<i>Associated receiver</i>					
K11-1	710,652	6,382,554	639	1,042	27
L6-1	711,530	6,388,112	385	2,537	21
Q13-1	716,474	6,381,259	629	1,588	51
R14-1	716,862	6,380,138	620	1,616	62
S11-1	718,297	6,382,726	701	536	50
S12-1	718,499	6,382,037	707	650	51

Based on the distances, and the estimated air blast overpressure and ground vibration levels, the following can be established:

- Estimated air blast overpressure levels at all non-associated receivers are below the criteria set for all blasts

- Estimated air blast overpressure levels at two associated receivers (S11-1 and S12-1) may be above the criteria for all blasts for some maximum instantaneous charge weights i.e. above 10 kg
- Estimated ground vibration levels at all non-associated and associated receivers are below the criteria set for all blasts.

Accordingly, if blasting is required, the activities would be controlled using blast management procedures documented in an approved construction management plan. The procedures would need to identify the locations where blasting could be conducted, and describe the testing, management and monitoring measures which would be implemented to achieve the ANZEC 1990 Report criteria. This is expected to involve conducting test shots to evaluate site-specific characteristics, in turn enabling the selection of suitable maximum instantaneous charge weights that are appropriate for the site.

Construction vibration

At this stage project specific construction staging and equipment is not known. Table 22 of the EIS NVIA (MDA 2023) provides typical minimum working distances for human response limits for vibration intensive plant, based on information provided in Section 7.1 of the NSW RMS Construction Noise & Vibration Guideline (CNVG).

Based on the construction layout plan detailed in Appendix L of the EIS NVIA (MDA 2023) no associated or non-associated receivers are identified within the minimum working distances. Nonetheless, mitigation measures have been proposed to limit impacts of construction vibration.

4.1.9. Fire and Rescue NSW

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 14 November 2023, requesting advice on the EIS for BURRENDONG WIND FARM – APPROXIMATELY 30 KM WEST OF MUDGE, NSW IN MID-WESTERN LOCAL GOVERNMENT AREA (SSD-8950984). FRNSW have reviewed the EIS with particular focus to Section 7.1.5 Hazards and Risks, along with the Appendix E Detailed Mitigation Measures.

It is deemed that the proposal has limited scope and application in regard to special hazards or special problems of firefighting. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation.

While there is currently no requirement for a Fire Safety Study, FRNSW may recommend one be undertaken at a later stage should information be provided such that the development is deemed to pose special problems of firefighting or special hazards exist that require additional fire safety and management measures.

RESPONSE

FRNSW's comment is noted. The Proponent will undertake a Fire Safety Study at a later date if deemed necessary by FRNSW.

4.1.10. Heritage Council of NSW (Aboriginal Heritage)

Please clarify the number of sites identified in the assessment and their interactions with the proposed impact footprint. The executive summary notes 106 and 102. Table 11 lists 59 sites identified within survey units. Table 12 provides limited description of 60 sites. Table 14 identifies 35 sites; 34 to be impacted and 1 to be avoided.

The mapping of Survey Unit 30 and 31 in Appendix B includes a PAD1 in proximity to the development footprint. This PAD is not described or discussed in the ACHAR.

RESPONSE

The ACHAR has been updated to reflect the minor amendments to the Project Development Footprint/Development Corridor.

The archaeological investigations have identified 284 aboriginal sites within 30km of the Project Site. Of these 116 aboriginal sites are situated within the Project Site and 44 lie within the Development Corridor. Based on the current designs for the Project, 31 Aboriginal sites (of the 43) will be impacted by the proposed works. Most sites to be impacted are low density in disturbed eroded contexts and a mitigation of 'Movement' has been proposed.

Heritage NSW requests that additional documentation in relation to the consultation process be provided. Heritage NSW requires that consultation with Registered Aboriginal Parties (RAPs) is continuous. Under our guidelines, breaks in consultation of over six months may not constitute continuous consultation. If an unexpected break of greater than six months has occurred, the applicant may be required to restart the consultation process.

- Heritage NSW requests that the applicant demonstrates that the assessment methodology and draft ACHARs were provided to all RAPs for review in the record of consultation.
- It is noted that the project area overlaps the Warrabinga – Wirajuri #7 (NC2018/002) registered Native Title claim. Heritage NSW request that the applicant provide additional information to demonstrate the Native Title Party was contacted and provided information regarding the Project.

RESPONSE

The updated ACHAR has included a record of all of the consultation undertaken to date. A six (6) monthly update has been provided to the RAPs to keep consultation active since submission of EIS.

Warrabinga-Wiradjuri #7 (NC2018/002) were identified through the government responses as being within the Project Site. Contact details were not provided for the group. The group also did not register for this Project to be involved in consultation. Therefore, Native Title has not been determined. An updated record of consultation is provided within Appendix L.1 of the Amendment Report (ELA 2026a).

Please ensure that all requests for redaction made by the RAPs have been appropriately managed. Details of two RAPs who wished to not have their details made public have been included in Appendix D.

RESPONSE

This is noted and a redacted version has been submitted as part of Appendix L.1 of the Amendment Report (ELA 2026a).

It is noted that the submissions provided by RAPs are included in Section 2.3, however, responses to many of the issues raised by RAPs have not been provided as required in Section 3.1 *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* and Section 4.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. Please provide copies of the responses to the issues raised by RAPs.

RESPONSE

The updated ACHAR has included all consultation, and the comments received from the RAPs have been addressed where possible, refer to Appendix L.1 of the Amendment Report (ELA 2026a).

Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC) response to the Draft ACHAR dated 18 May 2023 notes 'the project area has significant "Songlines" through it'. This statement is noted in Section 6.2.2 along with the statement that the 'song lines have not been specifically linked to the Project site development footprint'. Please provide further detail of the research and consultation with the Aboriginal Community regarding the song lines identified by WVWAC and their interaction with the project footprint.

RESPONSE

The specific songline information was requested from WVVAC, who provided a map to the songline locations (confidential) which has been addressed within section 6.2.2 of the ACHAR (Appendix L.1 of the Amendment Report; ELA 2026a). The information provided by WVVAC in relation to songlines has been considered and resulted in amendments to the Project Site, Development Footprint and Development Corridor, in part to avoid potential impacts to identified Aboriginal heritage sites or valued areas.

From comparisons of AHIMS site distribution to the mapping of survey results, not all sites identified during surveys have been successfully registered on AHIMS. Please ensure all sites identified during the assessment are registered on AHIMS as required by Section 89A of the *National Parks and Wildlife Act 1974*.

RESPONSE

All AHIMS sites have now been registered and an updated AHIMS search has been completed in March 2026 except for five (5) Aboriginal sites along the road upgrade section of the Project site. The registration of these five (5) sites is pending as of 26 March 2026.

Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. Heritage NSW requires, as per Requirement 1b of the Code of Practice, that AHIMS searches are contemporaneous with the Project. Heritage NSW considers that AHIMS searches that are over 12 months to be invalid. Please provide an updated AHIMS search.

RESPONSE

AHIMS Database searches have been completed on the following dates for a 30km radius surrounding the Project Site:

- 9 March 2021
- 25 August 2024
- 11 November 2024
- 26 February 2026
- 26 March 2026.

The AHIMS search undertaken on 26 March 2026 identified 284 Aboriginal Sites. Appendix L.1 of the Amendment Report (ELA 2026a) provides the AHIMS Database Search Information.

Section 4.1 notes that the AHIMS search included in the ACHAR identified eight (8) restricted sites with only three (3) confirmed to outside the project site. Confirmation of the interaction of restricted sites with the study area is required. This information can be obtained by emailing ahims@environment.nsw.gov.au, and providing the list of restricted sites in question and a shapefile of your study area. Please include the results of this request in the revised ACHAR.

RESPONSE

The 9 March 2021 AHIMS search identified eight (8) restricted sites of which all were confirmed to be outside the Project Site by AHIMS, Mudgee Local Aboriginal Lands Council and the RAPs. The final AHIMS search (26 March 2026) identified a total of eight (8) restricted site to which AHIMS confirmed the Aboriginal Site was situated outside the Project Site.

Table 11 identifies the use of vehicle survey as a part of the assessment. Heritage NSW does not support vehicle surveys as a replacement for pedestrian surveys, as per Requirement 5 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (2010). Requirement 5 explicitly states “vehicle traverses are

considered to be reconnaissance activities only... they will not allow for suitable survey effectiveness calculations". Therefore, please remove all references to vehicle survey from the survey coverage, mapping, and adjust the relevant sections to reflect the amount of survey coverage undertaken on foot. Heritage NSW specific recommendations on this matter are as follows:

- Please clearly identify those areas that were subject to the pedestrian survey
- Please provide detailed and thorough mapping which includes survey track logs, as per Requirement 5 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (2010), to enable Heritage NSW to assess the efficacy of the survey coverage
- Heritage NSW will require areas subject to vehicle survey to be subject to pedestrian survey prior to approval.

RESPONSE

The Archaeological surveys undertaken are outlined in Section 5 of the revised ACHAR (Appendix L.1 of the Amendment Report (ELA 2026a)).

No areas previously surveyed by vehicles have been considered within the assessment as these areas are no longer part of the Development Footprint.

Heritage NSW notes that there was no survey of the overhead transmission line corridors. Requirement 5(A) of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (2010) states survey sampling must include all landforms that will potentially be impacted. Please clarify the impacts proposed for these areas. If areas of proposed impact were not subject to survey, Heritage NSW requires that a thorough survey and assessment occur prior to project approval.

RESPONSE

The amended Development Corridor has been fully surveyed, including the transmission line corridor and power pole locations. All Archaeological surveys have been conducted in accordance with *the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (Department of Environment, Climate Change and Water [DECCW] 2010) to inform sections 2.4 and 2.5 of the ACHAR (Appendix L.1 of the Amendment Report; ELA 2026).

Clarification of the sampling strategy utilised for the survey is required. Section 5.2 notes areas including disturbed existing graded vehicle tracks were sampled. It also states areas of ground surface exposure were targeted. The survey results note the high vegetation levels across the project area, leaving vehicle tracks as a major source of exposure in the landscape. Section 5.3 notes that the access tracks crossed areas of higher archaeological potential than the proposed turbine locations on the ridges. The RAPs state in their responses to the Draft ACHAR that they are of the view that it is important to survey all access tracks to be impacted by the Project. It is also notes 80% of the sites described in Table 12 were identified in association with vehicle track exposures sampled in the survey. Please clarify and justify the sampling of the access tracks in the survey strategy. If adequate justification is not provided, Heritage NSW recommends that further survey occurs prior to any construction impacts occurring in the project area.

RESPONSE

On 3 May 2021 project information, a survey sampling strategy and ACHA methodology was sent to the RAPs, however no written responses were received.

The archaeological survey was conducted on foot and aided by vehicles to traverse the expanse of the Project Site. The majority of the proposed impacts for access tracks within the Development Footprint (heavily disturbed by existing graded vehicle tracks) were surveyed in accordance with *the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010). The field survey methodology was as follows:

- The field survey involved a pedestrian survey to identify any unrecorded sites, areas of archaeological potential, and any areas of historical land use/disturbance
- All landform units within the impact area were sampled as part of the field survey. A full coverage survey targeted the WTG locations and power pole locations
- Record the land surface and vegetation conditions encountered and how these may impact on visibility of objects
- Documentation of cultural information as provided by Aboriginal representatives
- Any Aboriginal sites and / or PADs identified within the impact area were recorded using a GPS and photographed
- Any new Aboriginal sites be recorded on AHIMS (AHIMS Site Card) as required by Heritage NSW.

All visible ground surfaces and exposures were examined for Aboriginal objects (stone artefacts, imported shell, or other traces of Aboriginal occupation). An attempt during survey was made to identify and examine stone outcrops and old growth trees were examined for signs of cultural scarring and marking.

Descriptions of newly identified sites are limited to the 60 sites listed in Table 12. These descriptions do not include detailed information about the site or considerations about sub surface archaeological potential. As previously noted, 80% of the sites with a location description provided were located on heavily eroded and graded vehicle tracks, with this disturbance causing the exposure of the Aboriginal objects. Some of these tracks are in landforms identified with higher potential for subsurface archaeological deposits in the archaeological context and predictive model (Section 4 of the ACHAR). Please provide an assessment of the surrounding landform of the sites for potential subsurface archaeological deposit. Please provide greater explication on the potential for subsurface material and justification as to why test excavations should not occur prior to construction in the project area. If adequate justification is not provided, Heritage NSW recommends that test excavations occur prior to any construction impacts in the project area.

RESPONSE

The archaeological potential across the majority of the project area was low; no areas of archaeological potential were identified within the Development Corridor. Earlier phases of the Project design included WTGs south of Oakey Creek, with several Aboriginal sites located in the vicinity of these WTGs, and the access corridors had the potential for subsurface Aboriginal objects. The amendments to the Development Corridor has resulted in no aboriginal sites being impacted. As such, there is no necessity for test excavations within the Project Site.

If impacts are identified during the detailed design phase, further archaeological investigation would be undertaken. The investigations would entail subsurface test excavation for the purpose of identifying the presence of artefact bearing soil deposits and understanding their nature, extent, integrity and significance. Further archaeological investigation in the form of subsurface test excavation is necessary when it can be demonstrated that subsurface Aboriginal objects with potential conservation values have a high probability of being present in an area, or if and when the area cannot be substantially avoided by a proposed activity (NSW DECCW 2010).

Unmitigated impacts are proposed for 21 ACH sites and unclear mitigation measures for another 12. Heritage NSW recommends avoidance with long-term conservation measures put into place where possible. Where avoidance and conservation are not possible, Heritage NSW recommends that the sites are subject to surface collection and potentially salvage excavation. It is noted that the responses from the RAPs indicate their preference for collection of all surface Aboriginal objects within areas of impact and salvage excavation of subsurface deposits. Please clarify the mitigation measures recommended.

RESPONSE

Due to changes within the Project Development Footprint and Development Corridor the number of sites being impacted have been reduced. The sites being impacted (31 Aboriginal sites within the Development Footprint) will now be mitigated with surface collection and moved.

There will be one site which will be unmitigated (BWF SQ2). Unmitigated impact to Aboriginal objects can be given consideration when they are assessed to be of low archaeological and cultural significance, and otherwise in situations where conservation or limiting the extent of impacts is simply not feasible. However, the ACHAR has identified a potential opportunity for Aboriginal representatives to salvage some of the lithic resource for personal use or teaching (ELA 2026c) for the site that has unmitigated impacts. All other sites have had some level of mitigations implemented. Archaeological field survey has recorded information on existing Aboriginal objects within the Development Footprint, for low significant isolated finds in a disturbed context this is adequate mitigation.

Section 8.2 of the revised ACHAR (Appendix L.1 of the Amendment Report (ELA 2026a)) provides mitigation measures for all Aboriginal sites located within the Development Footprint, including further comments for those Aboriginal sites that will be unmitigated.

Heritage NSW notes that the ACHAR described AHIMS recording as '*adequate mitigation prior to impact*'. Please note failure to record any identified Aboriginal objects on AHIMS is an offence under Section 89A of the *National Parks and Wildlife Act 1974*, therefore it is a minimum legal requirement and is not considered mitigation for impacts.

RESPONSE

This is noted. All AHIMS sites have been recorded and further mitigation measures have been provided. Recording of identified Aboriginal objects on AHIMS has been removed as a mitigation measure and is acknowledged as a minimum legal requirement. Section 8.2 of the revised ACHAR (Appendix L.1 of the Amendment Report (ELA 2026a)) provides mitigation measures for all Aboriginal sites located within the Development Footprint.

The ACHAR and EIS both include the recommendation that when the design is finalised, additional archaeological assessment is conducted in any areas proposed for impacts that have not been surveyed during the current assessment. While the need for design refinement and the flow on of minor changes in impact footprint is recognised, this does not negate the need for adequate survey coverage and assessment prior to approval. The survey and assessment of items, such as the overhead transmission line corridors needs to be included in the ACHAR to inform the project approval process. If areas of proposed impact were not subject to survey, Heritage NSW recommends that a thorough survey occur prior to project approval.

RESPONSE

Following the submission of the EIS, it has been confirmed that the Proponent will proceed with the proposed southern powerline alignment rather than the northern powerline. Consequently, no survey effort for the northern powerline was undertaken and is not considered necessary going forward. Additional survey efforts have been undertaken following the submission of the EIS and upon receipt of submissions.

The archaeological survey was conducted on foot and aided by vehicles to traverse the expanse of the Project Site. All visible ground surfaces and exposures were examined for Aboriginal objects (stone artefacts, imported shell, or other traces of Aboriginal occupation). An attempt was made to identify and examine stone outcrops and old growth trees were examined for signs of cultural scarring and marking.

The footprint of works identified in the EIS includes a transport corridor subject to road upgrades. Please clarify if the approval for these impacts is part of SSD 8950984, as the ACHAR did not include these areas within the

assessment. If the transport corridor works are a part of the SSD 8950984 approval, they will need to be included in the Aboriginal Cultural Heritage Assessment.

RESPONSE

The ACHAR has been updated to include the transport corridor road upgrade areas along Twelve Mile Road, Yarrabin Road and Burrendong Dam Road, including the proposed upgrade of the Twelve Mile Road/Goolma Road intersection. This is included within the Road Upgrades – Heritage Memorandum, as Survey Unit 35 and mapping has been included (L.2 of the Amendment Report; ELA 2026a).

Section 6.8 of the EIS states 94 of the 102 sites identified on the AHIMS search were located in the assessment area. This is in contrast to Section 4.1 of the ACHAR which states no sites are within the project site. Please clarify this information.

RESPONSE

The ACHAR has been updated to reflect the amended Project Development Footprint and Development Corridor. The archaeological investigations have identified 116 Aboriginal sites. Of these 116 aboriginal sites, 44 lie within the Development Corridor. Based on the current designs for the Project, 31 Aboriginal sites (of the 43) will be directly impacted by the proposed works. Most sites to be impacted are low density in disturbed eroded contexts and a mitigation of 'Movement' has been proposed.

Three (3) sites have unmitigated impacts due to their low archaeological and cultural significance, these sites cannot be moved and the option to RAPs will be given to salvage some of the lithic resource for personal use or teaching, refer to section 8 of the updated ACHA; Appendix L.1 of the Amendment Report (ELA 2026a).

4.1.11. Heritage Council of NSW (Historic Heritage)

The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no heritage comments are required. The Department does not need to refer to subsequent stages of this proposal to the Heritage Council of NSW.

RESPONSE

Heritage Council of NSW (Historic Heritage) comment is noted.

4.1.12. Mining, Exploration and Geosciences NSW

MEG has reviewed the information supplied in relation to this Project and notes that the Project interacts with numerous exploration and mining titles. However, the Proponent has not supplied records of consultation with all exploration and mining title holders in the EIS, as required under the SEARs issues 30 September 2022.

MEG will continue to consider and comment on issues arising from consultation with title holders and provide further advice to the Department of Planning and Environment to ensure consultation with title holders is adequately addressed.

RESPONSE

Following the request by MEG NSW upon exhibiting the EIS, the Proponent has contacted ten (10) licence holders (nine (9) exploration and one (1) mining lease) who hold licences over land involved in the Project. The Proponent has contacted the licence holders both by email and letter (contact details and current licence information provided to the Proponent by MEG). The email and letter provided an introduction to the Project with maps showing where the licenced land was in relation to the project and invited the licence holders to reach out with any concerns or clarifications. In total, the Proponent received responses from two licence holders.

MEG has confirmed via email dated 18/04/2024, that they are satisfied with the Proponent's attempt to contact the licence holders, and the Proponent will continue to keep the licence holders informed as the Project progresses.

4.1.13. NSW Rural Fire Service

Feedback received from the RFS outlined five key recommendations which are addressed below.

A Bush Fire Emergency Management and Operations Plan (BFEMOP) in accordance with PBP 2019, should be developed prior to construction commencing at the site and provide detailed measures to prevent or mitigate fires igniting, work that should not be carried out during days of elevated fire danger (e.g. total fire bans), availability of fire-suppression equipment, access, and water, storage and maintenance of fuels and other flammable materials, notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation and that are proposed to be carried out during a day of elevated bushfire danger to ensure weather conditions are appropriate and appropriate bush fire emergency management planning. Two copies of the BFEMOP should be permanently stored at the operations and maintenance facility and a copy provided to local emergency responders.

RESPONSE

The EIS notes that a BFEMOP will be developed in accordance with *Planning for Bushfire 2019* in consultation with the RFS (ELA 2023; NSW RFS 2019). Two (2) copies are to be permanently stored at the operations and maintenance facility, "one stored at 'Emergency Information Cabinet' at the main entrance to Project, and a copy provided to local emergency responders"

From the start of building works, and in perpetuity to ensure ongoing protection from the impact of bush fires, the property around the structures and other related infrastructure, must be maintained as an Inner Protection Area (IPA), in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*, in all directions for a distance of 10 m as a defensible space for firefighting and drenching purposes. When establishing an IPA, the requirements for vegetation maintenance requirements outlined in Appendix 5 of the PBP 2019 will apply.

RESPONSE

Mitigation measure BF002 of the EIS (ELA 2023a) provides for the construction and maintenance of an Asset Protection Zone (APZ) (a minimum of 10 m wide) at the first stage of development for each WTG tower, wind monitoring mast, construction compound, switch yard, substation, and O&M Facility. APZs will be established and maintained as IPAs in accordance with *PBP 2019* (RFS 2019 and Addendum 2022).

The construction of any new Class 10 structures as defined per the National Construction Code must comply with Sections 3 and 9 (BAL FZ) of Australian Standard AS3959-2018 Construction of buildings in bush fire-prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas – 2014 as appropriate and Section 7.5 of *Planning for Bush Fire Protection 2019*.

RESPONSE

Consultation was undertaken with the RFS on 15 August 2024 and RFS were willing to withdraw the proposed condition. A formal request for modification of the RFS advice will be lodged on the Planning Portal.

Property access roads must comply with the following requirements of Table 7.4a of *Planning for Bushfire Protection 2019*:

- property access roads are two-wheel drive, all weather roads;
- the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes), bridges and causeways are to clearly indicate load rating.

- there is suitable access for a Category 1 fire appliance to within 4 m of the static water supply where no reticulated supply is available;
- minimum 4 m carriageway width;
- in forest, woodland and heath situations, rural property roads have passing bays every 200 m that are 20 m long by 2 m wide, making a minimum trafficable width of 6 m, at the passing bay;
- a minimum vertical clearance of 4 m to any overhanging obstructions, including tree branches;
- property access must provide a suitable turning area in accordance with Appendix 3;
- curves have a minimum inner radius of 6 m and are minimal in number to allow for rapid access and egress;
- the minimum distance between inner and outer curves is 6 m;
- the cross fall is not more than 10 degrees; and
- maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads.

RESPONSE

The Project will be developed and constructed to comply with the requirements of Table 7.4a in accordance with the *Planning for Bushfire Protection 2019* Guidelines.

The provision of water, electricity and gas must comply with the following in accordance with Table 7.4a of Planning for Bush Fire Protection 2019:

- a 20,000 litre static water supply tank must be provided on site;
- a connection for firefighting purposes is located within the IPA or non-hazard side and away from the structure;
- 65 mm Storz outlet with a ball valve is fitted to the outlet;
- ball valve and pipes are adequate for water flow and are metal;
- supply pipes from tank to ball valve have the same bore size to ensure flow volume;
- underground tanks have an access hole of 200 mm to allow tankers to refill direct from the tank;
- a hardened ground surface for truck access is supplied within 4 m;
- above-ground tanks are manufactured from concrete or metal;
- raised tanks have their stands constructed from non-combustible material or bush fire resisting timber - (see Appendix F of AS 3959);
- unobstructed access can be provided at all times;
- underground tanks are clearly marked;
- tanks on the hazard side of a building are provided with adequate shielding for the protection of firefighters;
- all exposed water pipes external to the building are metal, including any fittings;
- where pumps are provided, they are a minimum 5 hp or 3 kW petrol or diesel-powered pump, and are shielded against bush fire attack; any hose and reel for firefighting connected to the pump shall be 19 mm internal diameter; and
- fire hose reels are constructed in accordance with AS/NZS 1221:1997, and installed in accordance with the relevant clauses of AS 2441:2005;
- where practicable, electrical transmission lines are underground;
- where overhead, electrical transmission lines are proposed as follows:
 - a. lines are installed with short pole spacing (30 m), unless crossing gullies, gorges or riparian areas; and
 - b. no part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.

- reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used;
- all fixed gas cylinders are kept clear of all flammable materials to a distance of 10 m and shielded on the hazard side;
- connections to and from gas cylinders are metal;
- polymer sheathed flexible gas supply lines - are not used; and,
- above-ground gas service pipes are metal, including and up to any outlets.

RESPONSE

The Project will be developed and constructed to comply with the requirements of Table 7.4a in accordance with the *Planning for Bushfire Protection 2019* Guidelines.

4.1.14. Transport for NSW

OSOM Route (High Risk Heavy Vehicles Requiring Escort)

The reference to the blade length adopted for the project is inconsistent between EIS, Route Assessment and TIA. Clarify the accurate dimensions for the design OSOM (High Risk HVRE).

The Traffic Impact Assessment prepared by Stantec refers to Appendix A RJA Route Assessment, however, the RJA Route Assessment does not appear to form part of the suite of EIS Exhibition material. The icubed Route Assessment 2020 does form part of the EIS Exhibition material, however, focuses on Twelve Mile, Yarrabin and Hill End Road and not on the entirety of the route and is outdated. The RJA Route Assessment should be provided as part of the RTS supported by strategic designs for the pinch points.

RESPONSE

To clarify, the blade length incorporated into the TTIA for the Project is 82 m (refer to Appendix H.1 of the Amendment Report (Stantec 2026; ELA 2026a)). This blade length was proposed at EIS stage of the Project and no further changes have been made to this specification as part of the Amended Project.

The icubed Route Assessment was erroneously uploaded to the planning portal as part of the EIS submission. The Rex J Andrews Route Assessment was also prepared prior to the submission of the EIS and considered the candidate turbine length consistent with the EIS.

Additional updates to the Rex J Andrews Route Assessment (Rex J Andrews 2024) have been undertaken to include the strategic design for the pinch points as well as considering the upgrades which have occurred across the route from port to the Project Site.

It should be noted that the Port to REZ project being undertaken by EnergyCo for the common route to the Golden Highway have incorporated an 85m blade as the design component dimensions. The design parameters for the Port to REZ project should be reviewed to understand if there is any opportunity to leverage the work completed for the Port to REZ OSOM upgrades for the common route can be leveraged for this project. The Port to REZ OSOM upgrades to be completed by 2025 for the common route to the Golden Highway.

RESPONSE

It has been noted throughout the updated TTIA that the route upgrades to accommodate an 85-metre blade length design vehicle from Port of Newcastle to Golden Highway in Elong Elong and Castlereagh Highway in Beryl is likely to be completed by EnergyCo by the time the Project construction commences.

It is noted that in the TIA there is an expectation to utilise the OSOM road infrastructure upgrades being completed by Squadron Energy for the 82m blade for the Burrendong Wind Farm project. Five points to note regarding this approach:

- a) The upgrades have not yet commenced for Uungula Wind Farm for the entirety of the route from Port of Newcastle to Twelve Mile Road.
- b) The intersection of Goolma Road/Twelve Mile Road are currently subject to a WAD and will likely be completed in 2024. The design of this intersection has been based on the configuration for the 82m blade length and not the proposed blade length subject to this application of 90m). Further upgrades may be required to be able to achieve the turning movements required for the design OSOM subject to this application at this intersection.
- c) All pinch points that have been reviewed as a part of the Uungula Wind Farm development consent and Traffic Management Plan have been assessed for an 82m blade length and not the blade length proposed as a part of the Burrendong Wind Farm application. Therefore, it is unlikely that the upgrades undertaken for Uungula Wind Farm will be suitable for Burrendong Wind Farm. The OSOM route and pinch points should be reviewed, and strategic designs provided as a part of the RTS response, to ensure that the EIS and development consent captures the required scope of works for the OSOM upgrades.
- d) The upgrades will only occur along the shared route identified within the TIA and Route Assessment as Route 2A (to the point of the Goolma Road/Twelve Mile Road intersection).
- e) The route identifies as route 2B will not be used or upgraded by Uungula Wind Farm and therefore would not benefit from any of the upgrades required for OSOM subject to the Uungula Wind Farm. The pinch points, culverts and bridges should be reviewed for the high risk OSOM that will be required to utilise this route and strategic designs must be prepared for the road infrastructure upgrades required for Route 2B and will be required to accompany the RTS submission.

RESPONSE

- a) Refer to **Table 4.4 – Summary of Works Required on OSOM Routes (Stantec 2026)**, which identifies the upgrades along the route to be completed by EnergyCo and the Uungula Wind Farm. The proponent liaised with the Uungula Wind Farm project team in December 2025 and understands that the final upgrade on the route (not covered by Port to REZ) is the intersection at the Mitchell Highway and Goolma Road (Wellington), which is likely to be completed by the end of Q2 2026.
- b) The proposed OSOM route proceeds straight past this intersection, notwithstanding that the blade assessment is based on an 82-m blade.
- c) As noted above, the route assessment is based on a typical 82-m blade. Table 4.4 – Summary of Works Required on OSOM Routes (Stantec 2026) identifies intersections shared by both the Port to REZ route and the Uungula Wind Farm. In January 2026, Squadron provided the proponent with the final intersection design for the upgrade of the Mitchell Highway and Goolma Road. EMM has completed a strategic design (refer to Appendix H.2) demonstrating that the hardstand required for this project fits within the hardstand proposed to be completed by the Uungula Wind Farm by the end of Q2 2026. Strategic designs have also been completed for intersection between Goolma Road/Twelve Mile Road (near two mile flat) (refer to Appendix H.2). The areas of impact have been included and assessed as part of this project, and the remaining upgrades identified for Twelve Mile, Yarrabin, and Burrendong Dam Road(s) have been incorporated into, and assessed by, the project.
- d) Rex J Andrews (2024) provides an assessment of Route 1 (previously Route 2A) between Goolma and Twelve Mile (East) to the project site, identifying the intersections and road upgrades required to be completed by the project. All required upgrades have been included and assessed as part of the project (refer to Project Description).

Rex Andrews (2024) also provides an assessment of Routes 2 and 3 (previously Route 2B), where they diverge from Route 1 at the Golden Highway/Castlereagh Highway intersection to Goolma. A summary of

Assessment of the impacts of the TfNSW Projects due to the OSOM movements proposed as a part of this project for the identified OSOM route(s) as the Route Study prepared by RJA Route Survey does not appear to have sufficiently addressed the impacts to the TfNSW Projects or the impacts to the proposed OSOM route. The RJA Route Study is required to be revised to address how the OSOM loads could traverse the TfNSW projects along the OSOM route, civil works required to facilitate the laden loads through the TfNSW projects and evidence of consultation with the TfNSW project managers to ensure that access can be provided for the OSOM movements through the TfNSW projects.

- Hexham Straight Widening Project
- M1 to Raymond Terrace Project
- Belford to Golden Highway Project
- Rakin Park to Jesmond Newcastle Inner City Bypass
- Mudies Creek Bridge Upgrade

RESPONSE

The Route Study has been revised by Rex J Andrews and is included within Appendix G of the Amendment Report (ELA 2026a). The listed TfNSW upgrade projects are scheduled to be completed by the end of 2026 in advance of the likely Project OSOM movements.

Schedule of timing off the high risk OSOM Movements

Provide indicative timing for the first OSOM movements, the indicative daily schedule including the return vehicle schedule (and widths of the return vehicle).

RESPONSE

Indicative timing for the first OSOM movements has been included within Appendix 3 of the updated Rex J Andrews route assessment study (Appendix G of the Amendment Report (Rex J Andrews 2024; ELA 2026a). The indicative delivery schedule includes the following:

- Departure times from the Port of Newcastle
- Departure times from Merriwa
- Departure times from Wellington
- Arrival times at Burrendong.

The indicative schedule will be revised and updated as part of a future Transport Management Plan which will be prepared post-approval in consultation with TfNSW, MWRC, DRC and other relevant authorities.

Pullover and rest areas

The pull over, rest area and emergency breakdowns locations along the OSOM route(s) need to be reviewed regarding the suitability and viability to accommodate all High Risk OSOM loads dimensions (length, height, width) of the rest area and approaches.

The Route Survey must be revised to ensure that the pull over and rest area locations for the largest OSOM components are not located at locations that will have conflicts with vulnerable road users.

Ownership of the rest areas, pull over and layby locations identified should be reviewed to ensure landowners consent is provided to permit the use of the rest areas/pull over locations for the delivery of the OSOM movements associated with the project.

RESPONSE

The Port to REZ program includes additional pull over bays. Given that the majority of the OSOM route is common with other renewable energy projects in the region (e.g. CWO REZ and Uungula Wind Farm), the same pull over and rest areas will be used. However, the updated Route Study prepared by Rex J Andrews has identified four fatigue parking locations around the four (4) route options as per section 14, Appendix G of the Amendment Report (Rex J Andrews 2024; ELA 2026a). All four fatigue parking locations are owned by TfNSW and have the capacity accommodate the vehicles for all components:

- Golden Highway at Warkworth – No modification required
- Golden Highway at Hollydeen – No modification required
- Golden Highway at Cassilis Park – No entry sign should be relocated or made removeable
- Mitchell Highway at Wellington – No modification required.

Weight of the heaviest vehicle requiring escort

The RJA Route Study does not identify the vehicle combination and laden dimensions for the transformers to be delivered to the development. The weights of the transformers and vehicle configuration must be provided as a part of the Route Assessment and the weight and vehicle configuration of the transformer is required to be used to inform the bridge assessments.

RESPONSE

Power transformer(s) supplier, capacity and weights will only be finalised post-approval during the detailed design and procurement stage of the Project. There will likely to be two (2) 300MVA transformers, each with a transport weight of approximately 175 tonnes.

The dimensions and weight of key components is provided within Appendix 1 of the Route Study (Appendix G of the Amendment Report (Rex J Andrews 2024; ELA 2026a). The dimensions and weight of the components is indicative at this stage and will be confirmed during the detailed design phase once manufacturers are selected, post-approval. The route options for each of the components is also indicated.

Bridge assessments

The RJA Route Study does not include bridge assessments for the largest OSOM vehicles for all bridge assets along the OSOM route, in particular Ironbark Bridge, culverts, and bridges on Castlereagh Highway

RESPONSE

A request has been made to TfNSW on 23 September 2024, to confirm details of bridge assessments required for the revised OSOM routes from Port of Newcastle to the Project Site. TfNSW have responded on 4 February 2025 to confirm the information provided within Section 17 (Appendix 2), Appendix G of the Amendment Report (Rex J Andrews 2024; ELA 2026a) is sufficient information and there are previous approvals in place for the turbine components. TfNSW have also noted that additional assessment of the transformer would be required from the point of exit of the Golden Highway to the Project Site once the transformer specifications and transport vehicles details are available.

Bengalla and Wybong Road

Bengalla and Wybong Road are identified as local roads and will be required to be used for the loads that exceed the bridge tolerances for Denman Bridge and therefore the following matters are required to be addressed regarding this route within the RJA Route Study:

- a) Provide the detailed scope of work required for Bengalla and Wybong Road to facilitate the OSOM movements, inclusive of the intersections with the classified road network.

- b) Provide swept paths of the largest OSOM components completing the detour via Bengalla and Wybong Road, including the manoeuvring through the intersections with the classified road network.
- c) Road works are in progress with further work planned along Bengalla Road. Further information is required to understand the impacts or impediments the road works along Bengalla Road will have on the OSOM movements for the Burrendong Wind Farm.

RESPONSE

The revised Route Study prepared by Rex J Andrews (2024) has included an assessment of Bengalla Road and Wybong Road, including Denman Bridge. The Route Study has identified road modifications and pinch points which include:

- Route 1 and Route 3 – Golden Highway over Denman Bridge. Assessed as Caution. Procedure will include travelling directly ahead in the centre of the lane. A width of 6.5 metres and a height of 5.6 metres should not be exceeded of this structure. If loads are over these dimensions than they may detour the bridge via Bengalla and Wybong Roads
- Route 2 – Denman Road onto Bengalla Road. Assessed as required a road modification. Hardstand to be installed on inside of the corner
- Route 2 – Bengalla Road onto Wybong Road. Assessed as no issue. No problems with this section of road
- Route 2 – Wybong Road. Assessed as Caution.

It is noted that Bengalla Road and Wybong Road are in the process of being reclassified from local to state roads as part of the Port to REZ program and will be suitable for the proposed OSOM deliveries.

Twelve Mile Road/Goolma Road intersection

Twelve Mile Road/Goolma Road-100km/hr speed zone currently subject to a WAD which was required as a part of the Ungula Wind Farm approval the nature of the work is to realign Goolma Road and Twelve Mile Road and provide a CHR(s) and an AUL. Squadron Energy will be undertaking this road upgrade during 2024. The key aspects and additional information required for this intersection have been identified below:

- a) The cumulative traffic volumes including the through and turning traffic volumes associated with the other nearby projects, existing background traffic (plus growth rate) volumes and the project traffic volumes should be reassessed as a part of the RtS, in relation to the LoS and Turn Warrant Assessment for Goolma/Twelve Mile Road. It is noted that the geometry of the realigned intersection prohibits the provision of a full-length CHR.
- b) However, measures should be proposed to ensure that the traffic volumes are mitigated to comply with the proposed intersection treatments such as ensuring traffic is occurring in intervals, how the construction traffic will occur outside of the AM/PM project peaks and increasing the carpooling and providing shuttle buses to reduce the overall traffic volumes.
- c) The light, heavy vehicles, High Risk OSOM and general OSOM cannot utilise the existing intersection of Goolma/Twelve Mile Road and will have to wait until the completion of the realignment of Goolma/Twelve Mile Road that is currently being undertaken by Squadron for Ungula Wind Farm.
The intersection should be reviewed for the vehicle configuration for the High Risk OSOM design vehicle as the intersection has been designed for an 80.4m blade with overall laden load length of 91.86m.

RESPONSE

The Twelve Mile Road/Goolma Road intersection referenced above (near Wellington) and used by vehicles accessing Ungula Wind Farm is a different intersection to the Twelve Mile Road/Goolma Road intersection (near Two Mile Flat) which is proposed to be used by vehicles accessing the Project Site.

Notwithstanding that the intersection referenced differs from the intersection relevant to this project, the Twelve Mile Road/Goolma Road intersection near Two Mile Flat has been recommended for a BAR, and the OSOM transport route assessment identified the need to extend the pavement to accommodate turning blade vehicles. Both recommendations have been considered, and a strategic design is provided in Appendix H.2 of this report. As a result, an upgrade to the intersection has been proposed, and the impacts of the extended pavement have been assessed.

Burrendong Way/Mitchell Highway

Mitchell Highway/Burrendong Way- 100km/hr- existing four-way intersection consisting of an AUL southbound and a BAL for the northbound opposing intersection. 10% of traffic all turning left into the intersection via the existing intersection treatment. Swept paths (based on the HV design vehicle) should be provided to ensure that the existing treatments are sufficient to allow for passing and through traffic movements for the Mitchell Highway/Burrendong Way intersection and the Mitchell Highway/Spillsbury Lane intersection

RESPONSE

Swept paths have been completed to show the satisfactory passing of 19 m truck-and-dog vehicles turning left in (Figure 4-5) and right out (Figure 4-6) of Burrendong Way from Mitchell Highway. It is noted this is not an OSOM route. There are no concerns for southbound through traffic on Mitchell Highway, given there is an existing left turn deceleration lane on Mitchell Highway for vehicles turning left into Burrendong Way.



Figure 4-5: 19 m truck-and-dog left turn swept path into Burrendong Way from Mitchell Highway



Figure 4-6: 19 m truck-and-dog right turn swept path from Burrendong Way into Mitchell Highway

Mitchell Highway/Goolma Road

Mitchell Highway/Goolma Road- existing CHR(s) and BAL 50km/hr.

- a) The LoS and turn warrant assessment is required to form part of the RTS response and be based on the cumulative traffic volumes, background traffic volumes (plus growth) and project traffic volumes at this intersection. This is important as most of the construction traffic volumes associated with surrounding projects with a coinciding timeframe will occur between 6-7am and 5-6pm as per the defined construction hours.
- b) Based on this review of the LoS and turn warrants assessment measures should be proposed as a part of the RTS to ensure that the traffic volumes are mitigated to comply with the existing treatments.
- c) Alternatively, road infrastructure upgrades may be required for this intersection if traffic mitigation measures cannot be implemented. In this event Strategic designs will be required as a part of the RTS.
- d) Swept paths should be provided for the High Risk OSOM based on the vehicle configuration and load and any road upgrades required because of the High Risk OSOM review at this intersection should form part of the RTS response.

RESPONSE

A turn warrant assessment has been completed within the updated TTIA for the Mitchell Highway/ Goolma Road intersection, inclusive of cumulative traffic volumes and background traffic growth. Following a meeting with TfNSW on 25 July 2024, it was agreed that LoS assessment through traffic modelling was not required.

The turn warrants indicate that only a BAL treatment is required during the AM construction peak hour for the left turn movements into Goolma Road (at a minimum), refer to Appendix H.2 of the Amendment Report.

The swept path for the 82-metre blade High Risk OSOM has been completed by Rex J Andrews (Rex J Andrews 2024). The Rex J Andrews Route Study proposes road modifications including hardstand on the inside corner and signs to be temporarily relocated.

Since the EIS was placed on exhibition, the Uungula Wind Farm modification for the upgrade of this intersection has been approved. Squadron provided the Proponent with the detailed design of the proposed upgrade for reference. The strategic design in Appendix H.2 illustrates both the BAL and the hardstand required for blade transport, overlaid on the existing intersection, as well as the upgrades proposed by the Uungula Wind Farm.

The designs demonstrate that the existing pavement can accommodate a BAL and that the extended pavement proposed by Squadron will sufficiently meet this Project's requirements. Accordingly, no further work to this intersection is proposed as part of this Project.

General additional information required in relation to the TIA prepared by Stantec for Burrendong Wind Farm

The traffic assumptions do not appear to be supported by a traffic count survey. Further information is required in the form of the tube counts or data source for the traffic count assumptions for background traffic volumes identified within the TIA prepared by Stantec. As the Goolma Road traffic volumes do not appear to reflect recent traffic count surveys cited in other developments.

RESPONSE

To support the assumed background traffic growth rates, the nearest TfNSW Traffic Volume Permanent Classifier on Mitchell Highway has been analysed (Station ID: T6172S). This analysis has been included in Section 3.5 of the updated TTIA. The growth rate trends on Mitchell Highway are assumed to be similar to those on Goolma Road.

The results generally show a declining background traffic growth rate of approximately 1-2% per year (excluding the Covid years of 2020-2021). Given this, the assumed background traffic growth rate of 1% per year is considered to be conservative and appropriate for the region.

The AM/PM peak hour for the network peak have not been defined with the TIA prepared by Stantec. It is noted that the AM/PM peak for Goolma Road is closely aligned with the construction hours set for each Major Project of 6-7am and 5-6pm. The background AM/PM peak should be defined for each intersection requiring reassessment as a part of this RTS response.

RESPONSE

To establish a daily traffic profile, the nearest TfNSW Traffic Volume Permanent Classifier on Mitchell Highway has been analysed (Station ID: T6172S). This analysis has been included in Section 3.5 of the revised TTIA (Stantec 2026). The daily traffic profile trends on Mitchell Highway are assumed to be similar to those on Goolma Road. The results show that:

- the peak hour of the day is 3:00pm – 4:00pm
- the anticipated AM construction peak of 6:00am – 7:00am has an hourly traffic volume which is approximately 38% of the network peak hour volume
- the anticipated PM construction peak of 6:00pm – 7:00pm has an hourly traffic volume which is approximately 53% of the network peak hour volume.

It is noted that month 9-10 require 375 employees and even based on a carpooling rate of 2 persons per a vehicle this would equate to 187.5 light vehicles as opposed to the assumption of 125 light vehicles which is based on the average and not the maximum traffic generation. The TIA should be revised where references are made to the 125 light vehicle volumes to the actual maximum light vehicles that will occur during the peak of construction month 9-10 based on a 2 person per a vehicle calculation.

RESPONSE

The TTIA has been updated to assess a light-vehicle traffic generation rate of 13 one-way daily vehicle trips during the busiest two months of construction. This number is based on the updated workforce outlined in the CWAS prepared by Ethos Urban and reflects the operation of the on-site Temporary Workforce Accommodation Facility (TWAF). As noted above, this peak light-vehicle traffic is expected to occur between 6:00 am–7:00 am and 6:00 pm–7:00 pm, which are outside the network’s peak traffic periods.

Ensure that the heavy vehicle calculations have captured other OSOM that can travel under the class 1 exemptions and that are not categorised as high risk.

RESPONSE

All OSOM transport vehicles (as assessed by Rex J Andrews 2024 and reproduced in Table 4.2 of the revised TTIA) cannot travel under any of the Class 1 Load Carrying Vehicle Exemption Notices, given they are all over 5.0 metres in height (Part B) and/or over 115 tonnes in weight (Part C).

There is a reference to reducing speed limits on some roads (s6.5.3 Vehicle Access-signage). Reducing speed limits on the state classified road network is not supported for developments, inclusive of renewable projects.

RESPONSE

Noted. This comment has been amended to clarify that reductions in speed limits would only be considered on local roads that site access points are situated on.

Include the growth rates to the year of peak of construction within the background traffic volume assumptions 1% for Castlereagh Highway and 1.5% for Goolma Road.

RESPONSE

As noted above, background traffic growth rates are generally declining in the region, and hence an assumed background traffic growth rate of 1% per year is considered to be conservative and appropriate for all roads within the region.

4.1.15. UGL Regional Linx

UGLRL has reviewed the Environmental Impact Statement (EIS), Appendix I – Traffic and Transport Impact Assessment (TTIA), and Appendix J – External Route Study. The review found that proposed heavy vehicle and Over-Size Over-Mass (OSOM) route will be crossing the operational and nonoperational rail corridors at several locations.

The TTIA does provide information and locations of a number of level crossing managed and operated by ARTC. In addition, TTIA also provide information for the railway level crossing located at Saxa Road, Montefiores, which is managed by UGLRL.

It should be noted that the proposed Heavy Vehicle and OSOM routes are crossing operational and nonoperational railway corridor on CRN on seven (7) locations. These locations with aerial imagery are provided below from Figures 1 to 7.

- The applicant must be aware of all crossings on CRN rail corridors located along the transport routes associated to the proposed development. Therefore, it is advised to include information on identified crossings on operational and non-operational CRN rail corridors in the EIS documents. In addition, if any adverse impacts to CRN corridor are identified in the EIS documents, the applicant shall seek approvals from UGLRL. Please also note that the applicant must adhere to the transport management and safety requirements of UGLRL and TfNSW for the matters involving CRN corridor.

RESPONSE

The TIA identifies all active railway level crossings on the road network. Most of the seven CRN rail corridor locations identified by UGLRL do not have physical railway level crossings. Summaries of these locations are provided in Table 1 of the TTIA (Stantec 2026).

No adverse impacts to the CRN corridor are expected.

4.1.16. WaterNSW**Impact Assessment**

One of the SEARs requirements included the need for the proponent to consider the direct and/or indirect impacts to WaterNSW lands and infrastructure. Although the EIS acknowledges this requirement, no specific impact assessment was included (section 6.10 of the EIS or Appendix P), except for impacts to our telecommunications networks. Our assessment has found the following:

- There is potential unassessed impact to the auxiliary spillway of Burrendong dam from the alternative powerline connection route. While it is likely that these risks can be mitigated with sensitive design, there would be risks to our lands and operations from the placement of poles and lines in this location that requires further assessment. WaterNSW requires that the impact from the alternative power supply route at this location is assessed
- The Telecommunication Impact Assessment (Appendix L) found one (1) ACMA link transects the Project Site, that being the WaterNSW link between Burrendong Dam (ID 250574) and Mt Bocoble (ID 35200). WaterNSW has reviewed the potential impacts to this link and has concerns with regards to the analysis undertaken. The Telecommunication Impact Assessment makes no mention of antenna heights at these two sites. The ACMA database that would have been used for the link data between Burrendong Dam (ID 250574) and Mt Bocoble (ID 35200) has antenna heights of 0 m. The assessment needs to consider the antenna heights of 25 m at Burrendong Dam (ID 250574) and 35 m at Mt Bocoble (ID 35200). WaterNSW requires the impact on the link's performance to be further assessed with regards to interference from the proposed wind turbines.
- In order for WaterNSW to assess the potential impacts to our lands from this project (including potential impacts not identified in this EIS), we require the proponent to provide supporting detail at (RTS stage to demonstrate that consideration of any other direct and/or indirect impacts to WaterNSW lands and infrastructure occurred and to identify any potential impacts to WaterNSW operations and infrastructure.

RESPONSE**Auxiliary Spillway of Burrendong Dam**

During ongoing Project design and following further consultation, the Proponent has confirmed that the southern powerline route identified as the preferred route in the EIS has been selected. As such the alternative transmission route referenced by WaterNSW will not be required and potential impacts to the auxiliary spillway of Burrendong Dam will be avoided.

Telecommunications Impact Assessment

The concern raised by WaterNSW regarding the analysis of impacts to the WaterNSW link within the Project Site. A single point-to-point link, owned by Water NSW, traverses the site. Consultation with Water NSW is included in Appendix A: Stakeholder Correspondence and Responses of the revised Telecommunications Impact Assessment (Appendix K of the Amendment Report (Middleton Group 2024b; ELA 2026a). Water NSW responded to the initial engagement with Middleton Group in 2021 and at the time confirmed that the wind farm will not cause any material impact on the link. Since this initial engagement, the WTG layout and link path have changed. Water NSW have expressed that the antenna heights of the two sites have not been considered.

Since revision 1 of the Telecommunications Impact Assessment (04/05/2022), one (1) end of the link has been shifted approximately 1 km due south. Detailed assessment of the link was undertaken based on the new turbine locations provided and the location of the transmitter and receiver sourced from ACMA. Water NSW expressed no concerns to the proposed WTG layout in 2021. However, with the revised layout, Water NSW expressed that the antenna's heights have not been considered in the 3D modelling. Hence, the 2D modelling phase would be the same. Middleton Group has considered feedback from WaterNSW and amended the report to assess the link with the transmitter (Burrendong Dam, ID 250574) with an antenna height of 25 m and the receiver (Mt Bocoble, ID 35200) with a height of 35 m. As such, when the expected wave-front associated with the knife-edge diffraction is plotted (Figure 4-7), the extent of expected interference from WTG 19 indicates that the $0.6 \times$ maximum 1st Fresnel Zone threshold will not be exceeded.

WTGs along the propagation path can cause an increase in interference due to the combination of diffraction effects caused by the local environment and the WTG, as well as potential reflection/scattering. Notwithstanding the above, it is expected that the current siting may not cause any material impact to the link (Figure 4-8).



Figure 4-7: WTG 19 envelope based on 180 m rotor diameter, relative to 0.6 multiplied by maximum 1st Fresnel Zone extent of Link 1 (Middleton Group 2024b)

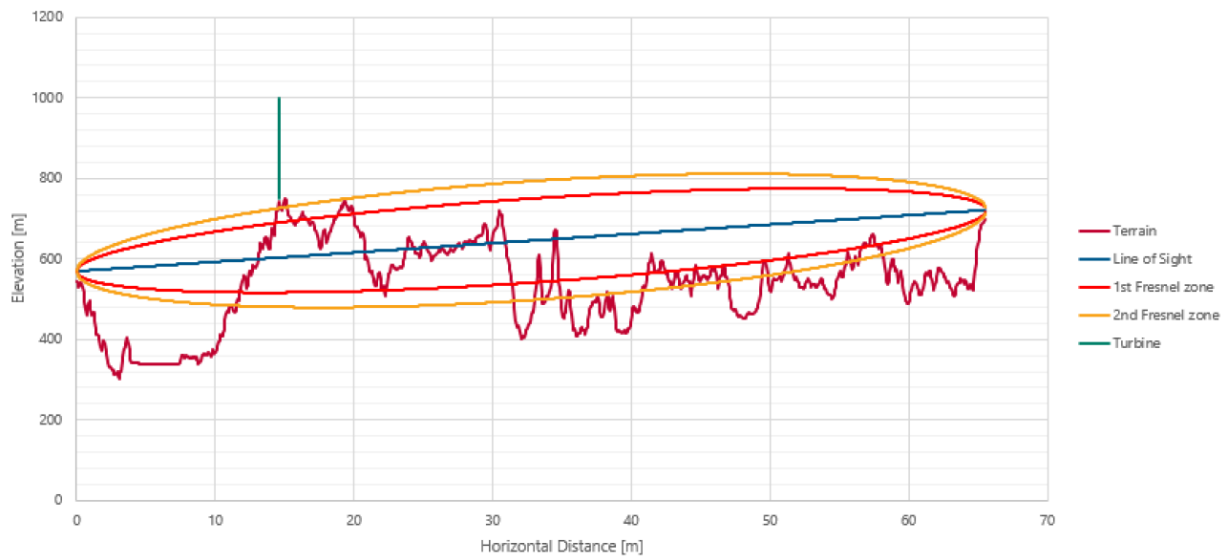


Figure 4-8: Topography of Link 1's path, Line of Sight, Turbine location and expected link path considering knife edge diffraction (Middleton Group 2024b)

Hydrological Assessment

The Project is situated within the Burrendong Dam water catchment area, with project surface water runoff draining to Lake Burrendong either directly or via its tributaries. While the dam lake and its foreshores are popular for holiday makers, water sports and fishing enthusiasts, the dam's main purpose is to assist with irrigation, livestock and household drinking water needs in the Macquarie Valley. This water source also manages and supplies flows to the Macquarie Marshes.

The EIS was required to assess the potential impacts on the quantity and quality of surface water resources within the Burrendong Water Catchment Area, with specific review of potential impacts including erosion and sedimentation, water availability, and potential pollution on watercourses during construction.

The EIS identifies that impacts will occur within the Burrendong Water Catchment Area, including Lake Burrendong and its locally draining catchments, the Macquarie River and Cudgegong River areas. However, the EIS lacks identification of site-specific locations where potential detrimental water quality impacts will occur. While mitigation measures to address impacts to these water areas are detailed in Section 6.11.3, the mitigation measures are generic in nature, providing no detailed information on specific mitigation measures required for this project, corresponding to the identified impacts.

It is noted that the resulting impacts to water quality are primarily derived from Total Suspended Solids (TSS) and their movement through the system. Mean annual TSS loads from each of the sub-catchments pre, and post development (Table 6-98 of the EIS) show that there is a significant increase in the sediment runoff from the Project (prior to any mitigation measures).

Further, while the majority of disturbance from the Project is in the very upper catchment areas, the deposition of sediments in the receiving headwaters has the potential to alter the landscape and channel form of those watercourses, impacting upstream environments. Sediment load deposition locations should be identified, modelled and further assessment of any high-risk areas occur. It is also recommended that more detailed erosion investigations be undertaken to develop designs for appropriate erosion mitigation actions.

Due to the lack of supporting impact assessment, it is unclear if the proposal would have an acceptable impact on downstream waterway health. It is not possible to accurately determine the risk of the project to waters, and further assessment and detailed mitigation measures are required at RTS stage.

RESPONSE

The Surface Water Impact Assessment (ELA 2024a) has been revised and included as Appendix M of the Amendment Report (ELA 2026a). The revised assessment has considered the volumes of water required primarily for the construction phase of the Project.

It is anticipated that the Project will require between 850 (wet year) and 1,400 (dry year) ML/year for dust suppression needs during construction. The construction phase is expected to take between 18 months and 2 years. Over this period, therefore, it is estimated that between 2.6 and 3.8 GL water will be required, not including requirements for workers accommodation.

The updated assessment has considered the source of the water supply. The water supply would primarily be for dust suppression which will be sourced from an appropriate location with the relevant licences. The sources of water under consideration include the nearby are the Macquarie River, Cudgegong River, Burrendong Dam and catchment farm dams (used for stock). Whilst some water may be sourced from farm dams, the volume of water required will exceed the water availability from this source. Therefore, water will need to be sourced from the other nearby options or alternative water sources (with relevant licences).

An alternate supply may come from registered groundwater bores. Whilst yields from the Lachlan Fold Belt Fractured Rock Groundwater Source are likely to be low (1-2 L/s), these can be used to fill temporary water tanks or augment existing farm dams to provide storages for the water tankers. Currently, this water source has significant capacity below its sustainable yield (ELA 2024b).

As outlined in the revised Groundwater Impact Assessment (ELA 2024b), there is significant unassigned groundwater in the Lachlan Fold Belt Fractured Rock Groundwater Source (up to 668 GL/year), a portion of which could be utilised during construction with storage facilitated by local farm dams and temporary storages that can be transported as required to follow the construction footprint and removed following commissioning of the WTGs and ancillary infrastructure. The specific source of water for the construction needs is still under consideration and no agreements have been implemented to date. The Proponent is making efforts to identify a suitable source or sources, but this will likely be post-approval and within the Water Management Plan.

Post construction, during the operation of the WTGs, the water requirements are likely to be minimal. Should water be required, potential sources would be satisfied by the catchment farm dams or water carts.

The revised Surface Water Impact assessment (ELA 2024a) developed a MUSIC model to represent the catchment runoff and water quality runoff (using TSS (total suspended solids) as proxy) for the catchments of Lake Burrendong located within the Project Site. The model was setup for existing, developed, and mitigated conditions, and is summarised in Appendix M of the Amendment Report (ELA 2026a). The results of the modelling undertaken prior to mitigation indicate that there is a significant increase in sediment runoff as a result of the Project, primarily due to the changing of land uses from forest or grazing land to gravel roads and construction pads pre-Project (existing conditions) to post-Project (Developed Conditions).

Given this impact, mitigation measures will be implemented to manage water quality runoff generated by the Project. The MUSIC modelling was utilised to explore potential mitigation measures for water quality runoff from the Project. The mitigation options proposed include use of a sediment basin and a swale to capture sediment runoff from the disturbed areas (e.g. roads and hardstands) before it reaches the downstream environment. The modelling (under mitigated conditions) shows that a minimum of 86%, and in many cases 99%, of the expected TSS in each sub catchment can be expected to be mitigated with the implementation of basic mitigation measures. Prior to commencing construction the Proponent will prepare and implement a Soil and Water Management Plan in consultation with WaterNSW and NSW Water Group. The plan will include the design of suitable bunds, swales, sediment basins and a soil erosion monitoring program to monitor impacts on the Site.

Cumulative Impacts

Through the review, WaterNSW also identified that there was no reference to the proposed Phoenix Pumped Hydro Energy Storage (Yarrabin). The Department should ensure that a cumulative impact assessment is undertaken which incorporates both projects.

RESPONSE

The Phoenix PHES project was not included in the cumulative impact assessment undertaken for the EIS as at the time of preparing the EIS, as the Phoenix PHES project did not have sufficient public information to be considered. It is noted that in accordance with the NSW *Cumulative Impact Assessment Guidelines for State Significant Projects* (DPIE 2022), the Phoenix PHES project will be required to consider the cumulative impacts of the Project in the preparation of their EIS, helping to alleviate the concerns that projects are not being fully considerate of their cumulative impacts. It is noted that MWRC has commissioned a report identifying cumulative impacts and proposed mitigation measures to manage the impacts of renewable energy SSD projects across the LGA, prepared by PwC (MWRC 2024).

4.2. Local Government Submissions

4.2.1. Dubbo Regional Council

Planning Agreement

Council’s updated Renewable Energy Benefit Framework requires planning agreements to be equivalent to 1.5% of Capital Investment Value (CIV). The CIV of this project is approximately \$800 million, which would equate to \$12 million over the life of the project (\$400,000 per annum over 30 years) on a non-pro-rata basis. Depending on the final layout and number of turbines in our LGA, this amount would change. Rough calculations, based on 48 turbines in our LGA, would equate to \$8 million over the life of the project.

The applicant has made reference to the Clean Energy Council’s (CEC) Guide to Benefit Sharing Options of \$3,000 per turbine per year, which would result in \$4.32 million over the life of the project.

Council would be seeking a Planning Agreement in accordance with the adopted Renewable Energy Benefit Framework, being 1.5% of CIV.

RESPONSE

An updated offer from the Proponent has been made and accepted by DRC on 2 October 2025 as shown in Table 4-11.

Table 4-11: Terms of DRC Offer

#	Description	Details
1	Annual developer contribution rate	\$525/MW of installed wind farm capacity (total of \$1,050/MW split equally between MWRC and DRC)
2	Payment commencement	Within 1 month of commencement of construction
3	Duration	Payable each year until decommissioning of the wind farm
4	Indexation	Payments indexed by CPI from the anniversary of the date of the planning agreement
5	Use of developer contributions	Councils to publicly and positively acknowledge the role of the project owner in funding public purpose projects and ensure that an appropriate portion of the contribution be allocated to the local community potentially affected by the wind farm and to First Nations communities in the region.

These key terms are consistent with the *Benefit-Sharing Guidelines* (DPHI 2024b).

Workforce Accommodation

The applicant proposes to prepare a Construction Workforce Housing and Accommodation Strategy prior to commencing construction, however this should be prepared and considered prior to approval of the project.

RESPONSE

A CWAS has been prepared by Ethos Urban and forms Appendix Q of the Amendment Report (Ethos Urban 2024; ELA 2026a) and a copy was provided to DRC for comment on 26 Aug 2024. It is anticipated that the Project will likely require 250 FTE workers at the peak of construction, with approximately 10% of workers being sourced from the Study Area (within MWRC and DRC) and approximately 90% from outside the study area. Those workers from outside the study area equating to 225 FTE at peak construction periods will require accommodation.

The CWAS has been developed to minimise negative impacts on the local housing market, the commercial accommodation and short-term accommodation providers and to be dynamic and adaptive. Additionally, mitigation options, monitoring plans and engagement strategy has been considered within the CWAS.

Haulage of Turbine Components

Turbine blades are proposed to be transported from the Port of Newcastle via Golden Hwy, Saxa Road, Mitchell Hwy, Goolma Road and then to the site via the Mid-Western Regional Council owned section of the Twelve Mile Road. Noting that Saxa Road is the only DRC road impacted by this route.

The proponent has nominated that most turbine components will be transported to the site on roads other than DRC roads. However, Saxa Road is proposed for the turbine blade haulage route, blade length and swept path issues mean that alternate routes via Gulgong or Dubbo are not physically possible. Saxa Road has been nominated for delivery of turbine blades but not for other tower components. There are no issues with this proposal.

It should be noted that Council is planning upgrades to Saxa Road to allow the transportation of wind turbine components to the Uungula Wind Farm project. In particular, a new bridge is planned to replace a flood damaged concrete causeway at Comobella, the new bridge is required to allow passage of the OSOM components prior to the end of 2024. Allowing use of Saxa Road for transportation of the Burrendong Wind Farm turbine blades, is consistent with the Uungula Wind Farm haulage approval.

RESPONSE

These comments have been noted and considered within the revised Route Study (Rex J Andrews 2024). The Saxa Road upgrades have been completed.

There are two route options for construction of a switchyard and transmission lines on the western side of Burrendong Dam. These are, Route 3A via Burrendong Way, Fashions Mount Road and Tara Road, or the alternate location using route 3B via Burrendong way and Burrell Creek Road.

Burrendong Way is a sealed 'Classified' Regional Road.

Fashions Mount Road is a sealed local road.

Tara Road is a local road with 2.1 km of seal and 3.26 km unsealed.

Proposed traffic movements indicate 13 vehicles per hour for a 9 month period, this is broken into vehicle class of >80% of light vehicles and <20% heavy vehicles. These movements are expected to accelerate the unsealed road condition.

Traffic movements on Route 3A (Fashions Mount Road and Tara Road), or route 3B (Burrell Creek Road) will be relatively high and pavement damage due to the additional traffic movements can be expected.

The relative increase of traffic volumes on Burrendong Way will be less than that experienced on the local roads. However, the additional traffic will impact pavement condition, all be it slightly.

RESPONSE

These comments have been noted and considered within the revised Traffic and Transport Assessment (Stantec 2026).

Recommendation

DRC has provided the following recommendations:

- Dilapidation surveys shall be undertaken and agreed (with DRC) as the current condition of all affected sealed roads prior to the commencement of works. Repairing and returning affected roads to pre-works condition (based on the dilapidation survey) at the completion of the construction and commissioning phases of the project.

Note: The dilapidation survey will be used at the end of the project as an objective tool to ensure the road is returned to Council in the pre-construction condition. However, waiting until the end of the project to undertake repairs is not practical.

- Commitment to maintenance of affected roads both during and post construction works for damage of sealed roads that is deemed to be caused to by the additional development traffic.

Note: This would be separate to the dilapidation survey requirement and is for routine maintenance that cannot wait until the end of the project.

- Full length gravel resheeting to the selected unsealed sections of route 3A or 3B to a minimum width of 6 m and a minimum depth of 100 mm.
- A Driver Code of Conduct.
- Measures that will be taken to minimise traffic related incidents.

RESPONSE

It is agreed that the Proponent will undertake dilapidation surveys as part of the Project and will be responsible for any repair or maintenance for impacts caused by the Project during the construction period.

A preliminary Code of Conduct is included in Section 6.5 of the revised TTIA (Stantec 2026). A more detailed Code of Conduct would be expected to be included in a TMP to be completed post-EIS approval.

The preliminary requirements for a Driver Induction training are included in Section 6.5.1 of the TTIA (Stantec 2026). Further measures to minimise traffic related incidents (including the driver induction training) would be expected to be included in a TMP to be completed post-EIS approval.

4.2.2. Mid-Western Regional Council

Further key issues identified by Council of great concern include:

- The limited transport report only considers traffic generated by this project. A requirement of the SEARs is to consider cumulative traffic generated by this project and other nearby energy projects.
- The provided EIS has identified sources of infrastructure in the region that simply do not exist. Gulgong and Rylstone are said to have hospitals, these are not hospitals, they are MultiPurpose Services (MPS). Rylstone is said to have a supermarket, it has a small convenience grocer (combined Foodworks and Liquor).
- A VPA has not been agreed upon with Council. The EIS notes a proposed \$3000/WTG. This is not something that Mid-Western Regional Council has agreed to. In the minimum, Council proposes \$1050 per MW generated per the current Draft Large-Scale Solar Guidelines.

RESPONSE

Sections 5.3, 5.4 and 5.5 of the revised TTIA addresses the cumulative traffic impacts of the Uungula Wind Farm and Maryvale Solar Farm (Stantec 2025). Construction of Uungula Wind Farm commenced in March 2025 and is anticipated to be finished by late 2026. Construction of Maryvale Solar Farm to commence in July 2025 and finish by late 2026. Overlap with construction of the Project is unlikely.

The EIS for Piambong Wind Farm and Yarrabin (Phoenix) Pumped Hydro (i.e. 'Burrendong Hydroelectric') are currently being prepared, meaning that traffic generated by these projects are unknown at this stage. As part of each of those EIS, it is expected that a cumulative traffic assessment would be undertaken by the applicants to include the impacts of the Project.

It is acknowledged that the medical services provided in Gulgong and Rylstone are officially classified as multi-purpose services rather than hospitals. Importantly, both these towns have a provision of medical services, which was the main purpose of providing this information. It is also acknowledged that the FoodWorks in Rylstone is a small supermarket with a convenience-focused offering.

An updated offer has been made and accepted by MWRC on 31 October 2025 as shown in Table 4-12.

Table 4-12: Terms of MWRC Offer

#	Description	Details
1	Annual developer contribution rate	\$525/MW of installed wind farm capacity (total of \$1,050/MW split equally between MWRC and DRC)
2	Payment commencement	Within 1 month of commencement of construction
3	Duration	Payable each year until decommissioning of the wind farm
4	Indexation	Payments indexed by CPI from the anniversary of the date of the planning agreement
5	Use of developer contributions	To be applied towards projects benefiting the community in Mid-Western Regional Local Government Area identified in Council's Community Plan and Delivery Program, in accordance with section 7.4 (1) and (2) of the EPA Act. Priority will be given to funding activities identified in the Mid-Western Regional Council Community Plan and Development Program within the local communities affected by the Development.

These terms are consistent with the *Benefit-Sharing Guidelines* (DPHI 2024b).

Workforce & Accommodation

The EIS notes there will be an estimated 375 workers during the peak construction period, which is expected to run for a period of approximately 18-24 months. The EIS has proposed that most accommodation options in the Study Area are located at Mudgee (35-minute drive), reflecting the town's role as a regional service centre. A more limited provision of visitor accommodation is in the smaller towns of Gulgong (45-minute drive), Wellington (85-minute drive) and Rylstone (70-minute drive).

Council strongly objects to this aspect of the project, as there is currently a severe shortage of appropriate accommodation in the region for residents and tourism, made worse by the competing demands placed on accommodation availability by State Significant Developments (SSD) and other major project construction workforces for developments.

The EIS notes in 6.14.1.6. Township Services Capacity- On average, around 75 workers would require accommodation per month across the 24-month construction phase, with this figure increasing to approximately 130 persons at peak construction. Council believes this number will be much higher due to the low unemployment rate in the region. What the proponent also fails to address is that there are a significant number of other major projects within and surrounding the Mid-Western Region looking to construct at the same or similar time. Most projects are estimating 90% non-local workforce and Council even questions if this will be available given the significant volume of projects in the region at the same time.

This shortage/competition will be particularly evident during the construction phase, which coincides with the peak construction periods of several other SSD projects in the region that are either approved or in the assessment/consultation phase. More projects are planned every day to meet the objectives of the Renewable Energy Zone, including:

Approved and/or Proposed SSDs in the Mid-Western Region LGA

- EnergyCo Transmission Line
- Stubbo Solar

- Narragamba Solar
- Birriwa Solar
- Beryl Solar
- Mayfair Solar
- Mavis Solar
- Tallawang Solar
- Barneys Reef Wind
- Burrendong Wind
- Piambong Wind
- Orana Wind
- Bellambi Heights Battery
- Beryl Bess
- Bowden's Silver Mine
- Moolarben Coal Mine
- Ulan Coal Mine
- Wollar Solar

Within 40 minutes

- Valley of the Winds
- Liverpool Range Wind
- Spicers Creek Wind
- Cobbora Solar
- Dapper Solar
- Sandy Creek Solar
- Merriwa Solar
- Goulburn River Solar
- Yarrabin Phoenix Pumped Hydro Project
- Dunedoo Solar
- Uungula Wind.

Council requests the mentioned construction Workforce Housing and Accommodation Strategy be provided to Council prior to consent of the proposed development so a proper assessment can be made. This should include the capacity to host up to 100% of workforce requirements. There are many issues raised in the EIS, where the mitigating measure is the development of this strategy. This strategy is critical to the project and needs to be completed and approved by Council prior to consent.

Council advises the Workforce Housing and Accommodation plan should consider that Council does not support the use of existing tourist and visitor accommodation for any construction workforce. Rooms available in the EIS is overstated and Council request the Proponent consider the status and timing of all other state-significant developments within and close to the Mid-Western Region to minimise any adverse cumulative impacts.

The EIS notes 25% of the workforce will be local, however Council advises due to the low unemployment rate of 1.7% (June 2023) in the Mid-Western Region and Mudgee being the closest centre.

Due to a serious shortage of GPs in the Mid-Western Region, with a current GP to patient ration of 1:1168 (Nov 2023). Council strongly recommends including an onsite medical centre and a 24-hour nurse practitioner who can prescribe medications. Council also recommends the implementation of telehealth services for workers and residents to access healthcare providers and GPs remotely.

Council requests the mentioned Workforce Management Strategy/Plan for review and approval prior to consent.

RESPONSE

A TWAf has been included within the Development Footprint to provide on-site accommodation to construction workers during the construction phase of the Project. The TWAf has the capacity to host up to 225 workers and therefore large enough to support 100% of the workforce requirements. Appendix A.2 of the Amendment Report provides an assessment of the potential impacts associated with the TWAf area (Barnson 2025; ELA 2026a).

A CWAS has been prepared by Ethos Urban and forms Appendix Q of the Amendment Report (Ethos Urban 2024; ELA 2026a). It is anticipated that the Project will likely require 250 FTE workers at the peak of construction, with approximately 10% of workers being sourced from the Study Area (within MWRC and DRC) and approximately 90% from outside the study area. Those workers from outside the study area equating to 225 FTE at peak construction periods will require accommodation.

The CWAS has been developed to minimise negative impacts on the local housing market, the commercial accommodation and short-term accommodation providers and to be dynamic and adaptive. Additionally, mitigation options, monitoring plans and engagement strategy has been considered within the CWAS.

Biodiversity

Council is satisfied with the BDAR (Biodiversity Development Assessment Report) completed by ELA for Burrendong Wind Farm. It is noted that WTG's will be constructed to have the least impact to remnant woodland. Although the exact impact of bird and bat strike once WTGs are operational cannot be quantified, Council notes that a bird and bat risk assessment has been conducted and a management plan will be developed to mitigate bird and bat collisions.

Council requests the Proponent to provide further details on how they plan to mitigate the likely high impact to Wedge Tail Eagle and White Striped Freetail Bat and moderate impact to Nankeen Kestrel, Superb Parrot, White Throated Needletail and Grey Headed Flying Fox. Council also requests to view the BBAMP once completed and ecological reports detailing numbers and species of birds and bats impacted by operational turbines.

RESPONSE

Proposed mitigation measures for potential impacts to birds and bats are included in the revised BDAR, refer to Appendix F of the Amendment Report (ELA, 2025a). A BBAMP will be prepared for the Project prior to construction and will incorporate analysis of two (2) consecutive years of data collect through BBUS and a revised CRM based upon the results of the BBUS. The BBAMP will include mitigation, management and monitoring strategies for high-risk species such as those listed in the submission, and will a Trigger Action Response Plan (TARP) for those high-risk species. MWRC will be provided with a copy of the BBAMP once completed and approved by BCS.

Water

The EIS identifies water sources to be the Macquarie and Cudgegong Rivers, Burrendong Dam, Farm dams and local water providers. The fixed water requirements for the Project are quoted as;

- 972.5 ML/-estimated to be required for the earthworks {956 ML), the WTG footings (10.5 ML) and transmission line footings (6 ML), and
- In excess of 1000 ML required for dust suppression, the amount of which varies based on the length of road being actively used and the climate at the time.

This is a total of 1972.5 ML of raw water requirements for construction, however this may be longer if road/routes are amended.

The EIS notes in Section 6.12.1.2, page 393 - Water Providers are intended on being sourced however have not been determined at this stage of the development process. The EIS notes in Section 6.12.2.1, page 399 the Proponent references 140-160ML of water for foundation and road construction - this appears to be inconsistent with figures derived in section 3.3.4.2 of the EIS and also Appendix 'Q'.

The EIS also notes in Section 7.1.10, page 483 - Waste Management and Resources' that construction water will be required and that the source of this resource is a commercial procurement decision which will occur post-development consent through licensed sources.

The EIS fails to identify the need for potable water to be provided for a construction workforce. This needs to be addressed in a further report, to understand requirements of additional water requirements for such workers. For example - other SSD project workforce accommodation camps have highlighted potable water requirements of approximately 250L/person/day. On the basis that at peak there will be 375 workers, this would mean 93,750L of potable water will be required per day. This is more than 6 trucks per day for supply. This water source needs to be identified and truck movements further considered in traffic studies.

For consideration in the development of water sources:

Potable Water - Council advises it does not currently have the capacity to support a potable water requirement. Potable water will be required to be sourced from alternate sources and cannot be sourced from local water carters accessing Council's licenced potable supply. The Proponent may require purchasing a water license to access additional water for this project.

Construction Water - At this point in time, the Proponent should not depend on Mid-Western Regional Council water sources (directly or through third parties) for construction activities, as the capacity to supply this does not exist. Council is willing to discuss this further with the Proponent to investigate alternative opportunities for construction water sources.

Council requests accurate water usage projections and confirmation on where water will be sourced, prior to consent for all aspects of the project including meeting workforce consumption needs.

RESPONSE

The Surface Water Impact Assessment (ELA 2024a) has been revised and included as Appendix M of the Amendment Report (ELA 2026b). The revised assessment has considered the volumes of water required primarily for the construction phase of the Project and addresses the discrepancies outlined within the MWRC submission.

It is anticipated that the construction of the Project will require between 850 (wet year) and 1,400 (dry year) ML/year for dust suppression needs. The construction phase is expected to take between 18 months and 2 years. Over this period, therefore, it is estimated that between 2.6 and 3.8 GL water will be required, not including requirements for workers accommodation.

The TWAF estimated water requirement will be approximately 33 kilolitres per day based upon a 225 person camp therefore, it is estimated that between 18.4 and 24.5 ML water will be required during the operation of the TWAF. Water supply for the TWAF will be via bulk water deliveries via tanker trucks from approved off-site sources, which will be determined during the detailed design phase of the Project, with potential options including licensed extraction from the Macquarie River, Cudgegong River, Burrendong Dam, or other approved water supply operators in the region. Delivered water will be stored in dedicated water storage tanks strategically located across the TWAF to support daily operational demands. Storage capacity will be designed to accommodate fluctuations in water use and to ensure uninterrupted supply during peak construction periods (Barnson 2025).

The revised assessment has considered the source of the water supply. The water supply would primarily be for dust suppression which will be sourced from an appropriate location with the relevant licences. The sources of water under consideration include the nearby are the Macquarie River, Cudgegong River, Burrendong Dam and catchment farm dams (used for stock). Whilst some water may be sourced from farm dams, the volume of water required will exceed the water availability from this source. Therefore, water will need to be sourced from the other nearby options or alternative water sources (with relevant licences).

An alternate supply may come from registered groundwater bores. Whilst yields from the Lachlan Fold Belt Fractured Rock Groundwater Source are likely to be low (1-2 L/s), these can be used to fill temporary water tanks

or augment existing farm dams to provide storages for the water tankers. Currently, this water source has significant capacity below its sustainable yield.

Sewage

The EIS notes on Table 6-106, page 405 - nominate Mid-Western Regional Council's Sewage Treatment Plant (STP) as potentially receiving waste that is generated by staff amenities, from licensed contractors.

Council advice is that Gulgong, Rylstone, or Kandos Sewage Treatment Plant's (STP) do not have any facilities to receive septage or sewage collected/tankered from sites not serviced by the town sewage collection system. In the Mid-Western Region, Mudgee STP is the only site that can receive such tankered waste.

Mudgee STP has an existing septage disposal facility designed to receive up to 20KL/day of tinkered sewage/septage. This facility has been designed to receive septage from Council's rural domestic customers. Mudgee STP has no capacity to accommodate additional loading of sewage at this point in time.

As such any capacity made available to this commercial project will need to be via consideration of STP upgrades. Council is willing to discuss this further with the Proponent to investigate opportunities for sewage disposal. If STP upgrades are not carried out, Council requires the Proponent to have suitable sewage treatment and treated effluent application facilities onsite without the need for sewage transfer to Council facilities.

Council requested accurate projections and confirmation on where sewage will be disposed, prior to consent.

RESPONSE

As discussed in Section 3.2.39 of the EIS (ELA 2023a), an approved septic system or composting system will be installed to treat minor quantities of wastewater, subject to securing the relevant authorisation.

The TWAf wastewater/sewage will be treated on-site using a self-contained wastewater/sewage treatment plant. The system will treat both greywater and blackwater in accordance with EPA and NSW Health requirements. The Proponent will prepare a separate Section 68 application in accordance with the *Local Government Act 1993*, proposing the installation of an on-site wastewater treatment system that meets relevant regulatory requirements (Barnson 2025).

Waste

The EIS notes in Section 6.12.2 the Mudgee Waste Facility was identified as the most appropriate facility to use for waste disposal associated with the Project.

Council requests the Proponent provide specific details regarding the expected waste to be generated during each phase of the project, including construction, operation, and workforce waste, as well as how it will be managed. A Waste Management plan should be developed and approved by Council prior to consent.

In this regard, Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudgee Waste Facility has limited capacity to accommodate enormous quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. All of Councils other waste facilities are waste transfer stations (including Kandos) accepting residential waste only, which is then transported to Mudgee waste facility. They will not be suitable for waste from this project.

Any other materials requiring recycling should be discussed with Council regarding their ability to accept.

Please note any contract with a third party such as JR Richards does not mean that materials collected can automatically be taken to a Mid-Western Regional facility.

RESPONSE

As part of the mitigation and management measures for the Project will adopt the following measures:

- The NSW Governments Waste Management Hierarchy of “avoid-reduce-reuse-recycle-dispose” will be followed as the framework of waste management throughout the Project
- The reuse and/or recycling of waste materials generated on site shall be maximised as far as practicable, to minimise the need for treatment or disposal of those materials offsite
- All waste material generated on-site will be dealt with in accordance with the POEO Act and Waste Classification Guidelines Part 1: Classifying Waste (EPA 2014), or any superseding
- Wastes that are unable to be reused or recycled will be disposed of offsite at a licensed waste management facility, or premises lawfully permitted to accept the materials following classification
- A Quantity Surveyor accredited Australian Institute of Quantity Surveyors (AIQS) must be engaged to estimate materials required for construction. Materials procurement will be planned and managed to avoid the over-ordering of products and minimise excess packaging is to be carried out
- Regular visual inspections will be conducted to ensure that work sites are kept tidy and to identify opportunities for reuse and recycling
- At site compounds, offices and ablutions waste bins will be provided for the recycling of paper, plastic, glass, and other re-useable materials
- Hazardous waste and sewerage will be managed by appropriately qualified and licensed contractors.
- Classify wastes in accordance with the NSW EPA Waste Classification Guidelines – Part 1: classifying waste (EPA 2014) and addendum (EPA 2016)
- All waste must be handled and stored on site in accordance with its classification and disposed of at appropriately licensed waste facilities.

As with all developments and operational sites, monitoring will be undertaken by staff, management and appropriate regulatory authorities including DRC, MWRC and the NSW EPA. A designated, monitored, complaints phone number will be available for the general public to be able to report any waste or other issues.

Transport

Council requires the Applicant to:

- a) revise and resubmit Appendix I -Traffic and Transport Assessment
- b) revise and resubmit all other sections of the EIS report and attachments where it refers to the outputs of the Appendix I Traffic and Transport Assessment.

The reasoning for this is as follows:

1. The report only considers traffic generated by this project. A requirement of the SEARS was to consider cumulative traffic generated by this project and other nearby energy projects. Known nearby energy projects are Piambong Wind farm, Burrendong Hydroelectric, Uungula Wind Farm and Maryvale Solar Farm. Traffic generated by these projects and any other known projects in the area, together with existing traffic counts, will impact the extent of upgrades required for all access roads and intersections.
2. Appendix I Traffic & transport Assessment states that during peak periods you can expect 375 employees. Assuming the 2 employees per light vehicle this would give Average Daily Traffic (ADT) of light vehicles being 375. If light vehicles make up 81-83% of traffic generated, then it follows that ADT for this project alone is 452 vehicle trips per day (two way). Notwithstanding ADT being underestimated throughout the report cumulative traffic impacts have not been considered in the critical calculations for pavement upgrades and intersection performance. As such the EIS underestimates vehicle trips generated by the project. The implications of this are that the proposed pavement width and intersection upgrades may likely be insufficient to support safe operation of the access roads and intersections during construction phase of the renewable energy projects.
3. Appendix I - Traffic & Transport Assessment table 4.3 provides for road pavement upgrades to Twelve Mile Rd and Yarrabin Rd to 5.5m and Burrendong Dam Rd to 5.5m - 6.5m. The Applicant has previously been advised during consultation that Council requires the traffic impact assessment must be done in accordance with

Austrorads guide to road design. Council will not accept the alternative methods to calculate road capacity considered in the Traffic Impact Assessment. Council's position is that the proponent must upgrade road pavement formation width and seal Yarrabin Rd, Twelve Mile Rd and Burrendong Dam Rd prior to commencement of the project. This work must be done by Council, at the cost of the applicant, and not be done by other contractors. Austrorads guide to road design part 3 Table 4.5 suggest that a minimum 7 .Orn seal is required where ADT accounts for more than 15% heavy vehicles (this report states 17-19%) and a total formation 9.2m with 7.2m wide seal (6.2m carriageway + 0.5m shoulder seals) is warranted for the traffic ADT 150-500 vehicles per day to be accommodated during construction and decommissioning. Pending proper assessment of cumulative ADT wider pavements may be warranted. Roadside drainage and other road associated infrastructure will also be required to be upgraded outside of the road pavement formation.

4. Appendix I - Traffic & Transport Assessment table 4.3 provides for intersection upgrades to Goolma Rd/Twelve Mile Rd only. Council requires the applicant to consider cumulative peak traffic volumes through intersections, that is it must include for traffic volumes generated from existing local traffic, other nearby renewable energy projects during working hours and to/from workers camps out of work hours as well as consider the swept path for the largest OSOM (Over Size Over Mass) vehicle to access the roads. To that end the intersections of Goolma Rd/Twelve Mile Rd, Castlereagh Hwy / Hill End Rd, and Hill End Rd/Yarrabin Rd are to be reassessed.

5. Council requires the applicant to perform, at the sole cost of the applicant, the process to legalise the physical road for ALL locations where existing encroachments exist, as well as where ALL proposed widening or relocation of road is required.

6. As workforce accommodation details remain undecided, the current traffic plans lack sufficient information to fully assess for the impact of the accommodation workforce traffic.

7. The absence of a port to site transport plan creates a significant gap and prevents a comprehensive assessment of the cumulative traffic impact.

8. Traffic noise plans need to be updated to reflect actual transport routes. Council requests updated traffic modelling be conducted after incorporating port to site and workforce traffic data. Council advice is it does not support "park and ride" type purposes on public land due to insufficient public car parking available in the region, and no public car parks or public road infrastructure are to be used for park and ride.

RESPONSE

1. Sections 5.3, 5.4 and 5.5 of the revised TTIA (Stantec 2026) addresses the cumulative traffic impacts of Uungula Wind Farm and Maryvale Solar Farm. Construction of Uungula Wind Farm commenced in March 2025 and is anticipated to be finished by late 2026. Construction of Maryvale Solar Farm commence in July 2025 and finish by mid-2027.

The EIS for Piambong Wind Farm and Yarrabin (Phoenix) Pumped Hydro (i.e. 'Burrendong Hydroelectric') are currently being prepared, meaning that traffic generated by these projects are unknown at this stage. As part of each of those EIS, it is expected that a cumulative traffic assessment would be undertaken by the applicants to include the impacts of the Project.

2. As per the submitted TTIA (Stantec 2023), the average daily traffic generation across the 24-month construction period was approximately 155 one-way vehicle trips per day (i.e. 310 two-way vehicle trips per day). The average daily traffic generation is significantly less than the peak daily traffic generation which could be expected in the busiest two months of construction.

Nevertheless, section 5 of the TTIA has been revised to present daily both average and peak one way traffic generation, which based on the numbers assessed at the time of the EIS the split would be as presented in Table 4-13.

Table 4-13 Average Modal Split of One-Way Traffic Generation

Vehicle Type	Average excluding OSOM transport period (months 1-8, 11-14 & 22-24)		Average during OSOM transport period (months 15-21)		Peak construction (months 9-10)	
	Average one-way trips	Percentage of traffic generation	Average one-way trips	Percentage of traffic generation	Average one-way trips	Percentage of traffic generation
Light vehicles	125 veh/day	83%	120 veh/day	86%	188 veh/day	77%
Heavy vehicles	26 veh/day	17%	16 veh/day	11%	57 veh/day	23%
Over-size over-mass vehicles	0 veh/day	0%	3 veh/day	3%	0 veh/day	0%
Total	151 veh/day	100%	139 vh/day	100%	245 veh/day	100%

However, since the EIS, the Proponent has reviewed workforce requirements for the construction of a wind farm of similar scale and subsequently reduced the proposed workforce numbers. The average expected number of employees is now 130, with a peak workforce of 250. Refer to Section 3 of Appendix Q of the Amendment Report (Ethos Urban 2024b).

Additionally, since the EIS, an on-site TWAF is now proposed as part of the project's temporary infrastructure. The facility is intended to accommodate 100% of the non-local workforce, which is expected to reduce daily light-vehicle movements on external roads from an average of **65 to 7**, and from **125 to 13** during peak periods. This represents an **89–94% reduction** in external traffic volumes and significantly reduces potential impacts on the surrounding road network refer to Appendix A.2 of the Amendment Report (Barnson 2025).

Section 5 of the TTIA presents the **average modal split of one-way traffic generation** and assesses all scenarios:

- (1) workforce numbers as presented in the EIS,
- (2) reduced workforce numbers without the TWAF, and
- (3) workforce numbers with an on-site TWAF.

Table 4-14 below outlines the modal split and reflects the reduced traffic impact associated with the inclusion of an on-site TWAF.

Table 4-14 Average Modal Split of One-Way Traffic Generation (based CWAS workforce, wit TWAF)

Vehicle Type	Average excluding OSOM transport period (months 1-8, 11-14 & 22-24)		Average during OSOM transport period (months 15-21)		Peak construction (months 9-10)	
	Average one-way trips	Percentage of traffic generation	Average one-way trips	Percentage of traffic generation	Average one-way trips	Percentage of traffic generation
Light vehicles	7 veh/day	21%	120 veh/day	86%	13 veh/day	19%

Vehicle Type	Average excluding OSOM transport period (months 1-8, 11-14 & 22-24)		Average during OSOM transport period (months 15-21)		Peak construction (months 9-10)	
	Average one-way trips	Percentage of traffic generation	Average one-way trips	Percentage of traffic generation	Average one-way trips	Percentage of traffic generation
Heavy vehicles	26 veh/day	79%	16 veh/day	11%	57 veh/day	81%
Over-size over-mass vehicles	0 veh/day	0%	3 veh/day	3%	0 veh/day	0%
Total	33 veh/day	100%	139 vh/day	100%	245 veh/day	100%

3. The road capacities assessed in Section 5.4 of the revised TTIA (Stantec 2026) have been based on an approved transport guideline in NSW (2002 RMS Guide to Traffic Generating Developments) in order to determine the impact to Level of Service for each road affected the Project. This is a separate assessment to the road pavement upgrade assessment, which has been completed by Rex J Andrews in the Route Study. Refer to Appendix G of the Amendment Report (Rex J Andrews 2024; ELA 2026a).
4. As per item 2 above, the TTIA has been revised to assess the turning warrants for each intersection during the peak light vehicle traffic generation times (6:00am – 7:00am and 6:00pm – 7:00pm), both with and without the cumulative impact of Uungula Wind Farm and Maryvale Solar Farm where applicable. During the network peak hour of 3:00pm – 4:00pm, there is expected to only be a minor traffic volume generated by the Project during the peak two months of construction, consisting of 5 one-way heavy vehicle trips (i.e. 10 two-way heavy vehicle trips) and a negligible amount of light vehicle traffic (given most employees would be expected to depart the site at the end of the day between 6:00pm – 7:00pm).
5. As part of the SSD application for the Project, the Proponent is seeking development consent for a range of road works to be undertaken on Twelve Mile Road, Yarrabin Road and Burrendong Dam Road to facilitate the delivery of the Project OSOM components. The proposed road works are described in more detail in the Amendment Report, Appendix A: Project Description.

However, as is often the case in regional NSW, parts of the as-built local road network are not located within the gazetted road reserve. In this case, portions of Twelve Mile Road, Yarrabin Road and Burrendong Dam Road fall outside the boundaries of the gazetted road reserve.

To regularise this situation and to allow the proposed road works to be undertaken on the local road network, MWRC (as the relevant Roads Authority for the subject roads) has requested that the Proponent coordinate the opening and closing of the affected sections of the road reserve. This process will be undertaken in accordance with a Memorandum of Understanding (MOU) that was approved by MWRC in late November 2025 and signed on 22 January 2026 which sets out the roles and responsibilities for:

- a. identifying the boundaries of the as-built road network road in accordance with Division 1 of Part 3 of the *Roads Act 1993*;
- b. opening and dedicating applicable sections of public road to Mid-Western Regional Council under Section 9 of the *Roads Act 1993*; and

- c. the closing of applicable sections of the road reserve that are outside the as-built road network in accordance with Division 3 of Part 4 the *Roads Act 1993*.

Under the MOU, MWRC agrees to accept the subject land and dedicate the land as a public road in accordance with the *Roads Act 1993*. It is Council's preference that the land required for the opening and dedication as a public road be acquired by agreement with the landowners of the subject land and that the Proponent lodge a plan of subdivision with MWRC to facilitate the opening and closing of the applicable section of the road under the *Roads Act 1993*.

The Proponent is progressing detailed negotiations with all the affected landowners along the subject sections of road in close consultation with MWRC and in accordance with the MoU with a view to finalising these negotiations prior to determination of the SSD application of the Project.

However, it is important to note that while the road upgrades will need to be completed to the satisfaction of MWRC prior to use by OSOM vehicles, there is nothing in the process outlined above and in the MOU with MWRC that must be finalised prior to determination of the SSD application for the Project under Section 4.38 of the EP&A Act. This includes reaching final agreement with the affected landowners to allow MWRC to regularise the alignment of the subject roads under the *Roads Act 1993*.

In this regard, the EIS contains sufficient information for the impacts of the proposed upgrades to be assessed in accordance with Section 4.15 of the EP&A Act. Secondly, the Project was declared "Public Notification Development" by the Secretary of DPHI on 30 October 2023 which means that the consent of the owners of the land subject to the SSD application (including those along the subject roads) are not required for determination of the application. In the view of the Proponent, to require formal agreement with the affected landowners for the acquisition of the subject land *prior to* determination of the SSD application would be contrary to the Secretary's declaration of the Project as "Public Notification Development" and inconsistent with the statutory scheme for State Significant Developments.

6. A more detailed analysis of construction worker origins and destinations has been undertaken in Section 5.2.3 of the revised TTIA (refer to Appendix H of the Amendment Report) based on information and data provided in the Economic Impact Assessment (EIA) for the Project (Stantec 2026; Ethos Urban 2023; ELA 2026a).
7. The route study report prepared by Rex J Andrews assesses the route from the port of Newcastle to the Project Site and acknowledges the Port to REZ upgrade program currently underway (Appendix G of the Amendment Report (Rex J Andrews 2024; ELA 2026a)
8. The revised NVIA addresses noise impacts from the proposed road upgrade works. Refer to Appendix E.2 of the Amendment Report (MDA, 2026; ELA 2026a)

Visual Amenity and Cumulative Impacts

Council would like to highlight the Piambong Wind Farm has been largely left out of this EIS report however is geographically close to the project. Whilst layout of Piambong WTGs may not have been known in preparation of this EIS, the Piambong Wind Farm should have been discussed and considered including in Table 6-123. As Piambong Wind Farm is acknowledged on page 450 of the EIS, the proponent is aware of this project.

This project is missing from Table 2.1 and importantly missing from the Visual Amenity Assessment. Per Piambong Scoping Report (see page 93 Figure 6-12) the Piambong wind farm is within site distance from this project. It is highlights that some residents will be impacted by 3 wind farms in close proximity- Ungula, Burrendong & Piambong. This has been ignored in this EIS. Council request the Visual amenity is re-done to include this project.

RESPONSE

The concerns of MWRC and the community about potential cumulative impacts of the Project and other proposed renewable energy projects in the area is acknowledged. A high-level overview of the potential impacts of Piambong Wind Farm has been included within the LVIA Addendum Report.

The WTG locations and height (230 m) for the Piambong Wind Farm have been determined by the Scoping Report as available on the Major Projects Website (December 2023). Due to topography, the Zone of Visual Influence (ZVI) figures illustrate variations in the extent of visibility of each Project. Opportunities to view the Project and Piambong Wind Farm simultaneously are generally limited to land between the two Projects, elevated positions to the far south of the Project and within the Project boundary.

There are 25 non-involved dwellings located within 8,000 m of the Project and the proposed Piambong Wind Farm. Of the 25 non-involved dwellings, the ZVI indicates 17 have the potential to view both Projects. The extent of visibility and resulting cumulative visual impact from these dwellings is anticipated to be low as visibility of the Project is limited by topography and intervening vegetation. A detailed cumulative visual impact assessment will be prepared in the EIS for Piambong Wind Farm.

Additionally, assessment of the Project, Piambong Wind Farm and Uungula Wind Farm has been undertaken which has identified limited visibility of all three projects simultaneously. Opportunities to view all three projects at the same time are limited to land associated with the Project area associated with the Project and the project area associated with Piambong Wind Farm. The assessment identifies some areas of elevated land to the south of the Project have the potential to view all three projects at the same time, however these views would be distant. There are no non-involved dwellings identified within 8,000 m of all three (3) projects.

Further information is provided within the LVIA addendum report, Appendix D of the Amendment Report (Moir Studio 2026; ELA 2026a). regarding OSOM and workforce traffic assessment refer to response 2. It's noted that park and ride is not supported, this is mitigated through the inclusion of the on-site TWAF which will house 100% of non-local workforce

Loss of Agricultural Land

Council would like to highlight the loss of high capability (LSC Class 3) and BSAL of 20.8 hectares is significant in a region of no class 1 land and limited Class 2 land. The disruption of up to 3,050.08 hectares of agricultural land, along with cumulative losses from other renewable projects will lead to reduced food production in NSW.

RESPONSE

The Project will not limit existing agricultural activity on the Project Site. The report NSW Agriculture Commissioner confirmed that renewable energy projects have very limited impacts on agricultural land (NSW Agriculture Commissioner, 2022).

Impacts on Dark Sky

The EIS notes lighting will potentially impact dark sky viewing. Council would like the proponent to understand if this will impact local tourism businesses that trade on night sky attraction for visitors to the region.

RESPONSE

The Project is not located within the Dark Sky distance band (18 km from the Siding Spring Observatory) where particular lighting measures apply.

An addendum to the LVIA has been prepared which considers the impact of AHL. The specific lighting required by CASA for safety is low intensity red obstacle lighting. This lighting is proposed on 39 of the 70 WTGs at a hub height only. Lighting strength of 2000 cd can be visible at a distance of 4,900m from the source. The proposed lighting

strength to be used for the WTGs would be 200 cd, with the visibility therefore considerably less. Considering the reduction of lighting strength to 200 candela, existing topography and vegetation, it is determined that the visual impact resulting from AHL is negligible on the night sky and further assessment is not required.

Mid-Western Regional Development Control Plan (DCP) 2013

Council would like to inform the Proponent to consider the contents of the Mid-Western Regional Development Control Plan 2013, in particular section 6.3 on Wind Farms. Council would like to highlight the clauses relating to the decommissioning and remediation of land following the cessation of the development, to ensure the preservation of the agricultural potential of the land.

Whilst all DCP 6.3 controls should be considered, special attention could be directed to the following controls:

Turbines shall not be located within 5.0 kilometres of any dwelling not associated with the development or from any lot upon which a dwelling may be constructed. The 5.0-kilometer setback proposes utilising a precautionary principle in addressing perceived visual, noise and health concerns

Turbines shall not be located within a distance two times the height of the turbine (including the tip of the blade) from a formed public road. A greater distance may be required by the road authority;

Turbines shall not be located within a distance 2.0km from a non-related property boundary;

Council acknowledges that local controls - such as Development Control Plans are not a technical matter for consideration in the determination of State Significant Development. Nevertheless, Council requests consideration be given to Section 4.6 of the DCP, as the standards adopted represent the Council and communities' expectations for such development and were the outcome of extensive community and stakeholder engagement. Consideration and compliance with Council's local controls is of great importance to Council, particularly given that wind farms are being imposed upon Council through State legislation, where they would be otherwise prohibited in the C3 (Environmental Management), and where such developments do not comply with any of the zone objectives for the RU1 Primary Production Zone.

RESPONSE

The DCP controls listed by MWRC have been noted but are not relevant to an SSD project.

4.3. Public Submissions

Responses to the issues raised in public objections and where appropriate how these issues will be managed by the standard conditions of consent are provided in the following sections. The responses address the individual concerns raised by community members and provide greater context, clarity and/or evidence to support the case that the Project has appropriately considered the potential impacts from the Project or has been amended to address.

Per Section 2.2, submissions have been categorised in accordance with the Guideline (DPIE 2022). Numerous submissions from community members were similar in nature or had consistent themes. Where this is the case, the overall theme of concern has been provided in bold in the text boxes below with some examples of specific quotes and submissions provided for greater context.

4.3.1. Environment, Economic and Social Impacts

4.3.1.1. Landscape and Visual

Landscape and Visual Impact Assessment Methodology

A number of submissions were made in relation to the methodology applied to the Landscape and Visual Impact Assessment (LVIA) specifically the scenic quality rating and photomontages prepared. Some examples of these concerns are listed below:

- *The LCU07 – Worlds End, fails to mention the high visual landscape significance of the Worlds End Ridgeline. It appears to provide an intentionally deceptive assessment for LCU07. It should be rated as 'HIGH' but it is only rated having as moderate landscape significance*
- *After seeing these completely unrealistic, and topographically inaccurate montages I feel sickened to the core....*

RESPONSE:

The LVIA was prepared in accordance with the Visual Assessment Bulletin (DPE 2016b) which outlines the best practice guidelines for the preparation of Landscape and Visual Impact Assessments. The methodology used for the assessment of LCU07 – Worlds End is outlined in Section 5.8 of the LVIA and the application of the methodology is provided in Appendix D.7, providing transparent methodology and assessment outcomes. This methodology is a quantifiable and provided a moderate impact rating for the Worlds End LCU. Given that the methodology used is in alignment with statutory guidelines, best practice and provides a repeatable and quantifiable visual impact rating, the landscape and visual assessment undertaken for the Project is adequate.

The LVIA was prepared by MLA, with photomontages developed using WindPro software to provide a visual representation of how the project would appear in the landscape. This software is specifically tailored for the preparation of wind farm project visualisations and utilises a range of data including topographic data to prepare accurate visual representations of the potential impacts of wind turbines in the landscape. While the Project may slightly differ visually to what is prepared in the photomontages, they are considered accurate and representative of the WTGs once constructed. The methodology used for the preparation of photomontages was provided in Section 9.3 of the LVIA and are prepared in accordance with the *Scottish Natural Heritage Guidelines: Visual Representation of Wind Farms, Version 2.2 February 2017* (as per the requirements of the Visual Assessment Bulletin).

POTENTIAL DWELLINGS OMITTED FROM ASSESSMENT

As detailed by Moir Landscape Architecture (2024), a number of submissions were made regarding the omission of dwellings from the LVIA report. Examples of the submissions include:

- Over 30 dwellings within 5 km of turbines and more out to 8 km have wrongly been excluded from the EIS maps and impact assessments based on a dwelling that has no statutory basis.
- This number is so WRONG. These 20 non-associated dwellings are NOT even 50% of the dwellings that are in the areas.
- There are also many other dwellings they look to have potentially omitted.
- I also note that our home is not included in the reportI request that my home be reincluded in the report. I have included a photo of our historic home

RESPONSE:

DPHI's Wind Energy: Technical Supplement for Landscape and Visual Impact Assessment (DPHI 2024) states that:

For the purpose of this document, a dwelling has the same meaning as the Standard Instrument - Local Environmental Plan (Standard Instrument) (a room or suite of rooms occupied or used as a separate domicile) and also includes any of the following:

- dwellings that have **development consent**, but have yet to commence or complete construction
- proposed dwellings that are subject to a **development application** that has been lodged prior the wind energy development application but is yet to be determined.

For the avoidance of doubt, a dwelling does not include:

- moveable dwellings as defined in the Standard Instrument including tents, caravans, or other portable devices used for human habitation
- any dwelling that been built illegally (as confirmed by the relevant council)
- a derelict dwelling (that is officially declared by the relevant council).

Dwellings included within the LVIA were those that met the definition of a dwelling within the Standard Instrument – Local Environmental Plan (Standard Instrument).

To support and ensure that all dwellings have been identified and assessed in the EIS LVIA, the Proponent has consulted with DRC and MWRC and sought confirmation of the relevant records confirming the status of the development applications and development consents for all potential dwellings located within 5 km of a proposed WTG.

MWRC confirmed that (according to their records) there are no records of a development application or development consent for dwellings on any of the land parcels listed in Table 4-15.

MWRC also confirmed that all dwellings constructed after 1967 require a development application and development consent. Searches of historical aerial imagery available through the NSW Spatial Viewer (NSW Spatial Services, 2026) were used to identify when the structure first appeared, enabling the building construction timing to be established – refer Table 4-15.

There were four dwellings identified in individual submissions as being historic buildings built before a DA was required (1976) (X18-2, X20-2, T23-1 and U24-1) have been assessed as dwellings – the results of the assessment can be seen in Table 4-16 below and a detailed assessment is presented in Appendix A of Appendix D of the Amendment Report (Moir Studio 2026; ELA 2026a).

Notwithstanding that there is no requirement to include other structures or buildings in the LVIA, the Proponent has assessed 19 additional building locations, prepared representative photographs, wireframe visualisations and assessed the visual impact of the Project from these building locations refer to Figure 4-9 showing building

locations and Table 4-16 for a summary of the assessment outcomes. Detailed assessments can be found in Appendix A of appendix D of the Amendment Report (Moir Studio 2026; ELA 2026a).

Table 4-15: Development Applications and Development Consent for Land Parcels

Building ID	Land Parcel (Lot/DP)	Council record of a consent for a dwelling	Council consent granted	Construction timing
U11-1	30/756921	No		After 1995
U10-1	121/792688	No		After 1995
V13-1	38/40379	No	Development consent and construction certificate for a storage shed issued 19 November 2001	After 1995
U9-1	53/756872	No		After 1988
V11-2	52/756921	No		After 1991
O17-1	58/756915	No		After 1980
U8-2	10/756872	No		After 1965 before 1971
W10-1	23/756921	No		After 1995
W10-2	50/756921	No		After 1988
WX12-1	20/756921	No		After 1988
W11-1	1/1220164 & 49/756921	No		After 2002
V11-3	37/756892	No		After 1971
U9-3	119/756921	No		After 1995
T8-1	56/756872	No		After 1995
X18-3	9/700395	No		After 1995
W19-1	7/700395	No		After 1995
S7-1	2/601087	No	Construction certificate issued for a storage shed on 20 June 2000	After 1995
X11-1	123/756921	No		After 1980
Y19-1	49/724584	No		After 1995
U24-1	1/634380	No	Approval for a rural outbuilding (BA131-84) issued 8 May 1984 and building permit for a hayshed (BA198-97) issued 28 August 1987.	Before 1964

Table 4-16: Additional Dwelling and Buildings assessed within 5 km of the nearest WTG

Building or Dwelling ID	Distance to Nearest Turbine (km)	Nearest Turbine ID	Visual Impact Rating
U11-1	1.07	53	High
U10-1	1.4	53	Low
O17-1	1.42	39	High
V13-1	1.62	57	Low

Building or Dwelling ID	Distance to Nearest Turbine (km)	Nearest Turbine ID	Visual Impact Rating
V11-3	1.88	53	Moderate
U9-1	1.96	53	Low
V11-2	2.14	53	Low
U9-3	2.49	53	Nil
W10-1	2.74	53	Low
XW12-1	2.75	53	Low
W11-1	2.86	53	Low
U8-2	2.87	53	Low
W10-2	2.95	53	Low
X18-2	3.07	61	Low
X18-3	3.35	61	Nil
W19-1	3.46	61	Nil
S7-1	3.66	49	Very Low
T23-1	3.78	70	Low
X11-1	3.81	53	Low
T8-1	3.89	49	Nil
Y19-1	4.46	61	Low
X20-2	4.59	61	Negligible
U24-1	4.68	70	Negligible

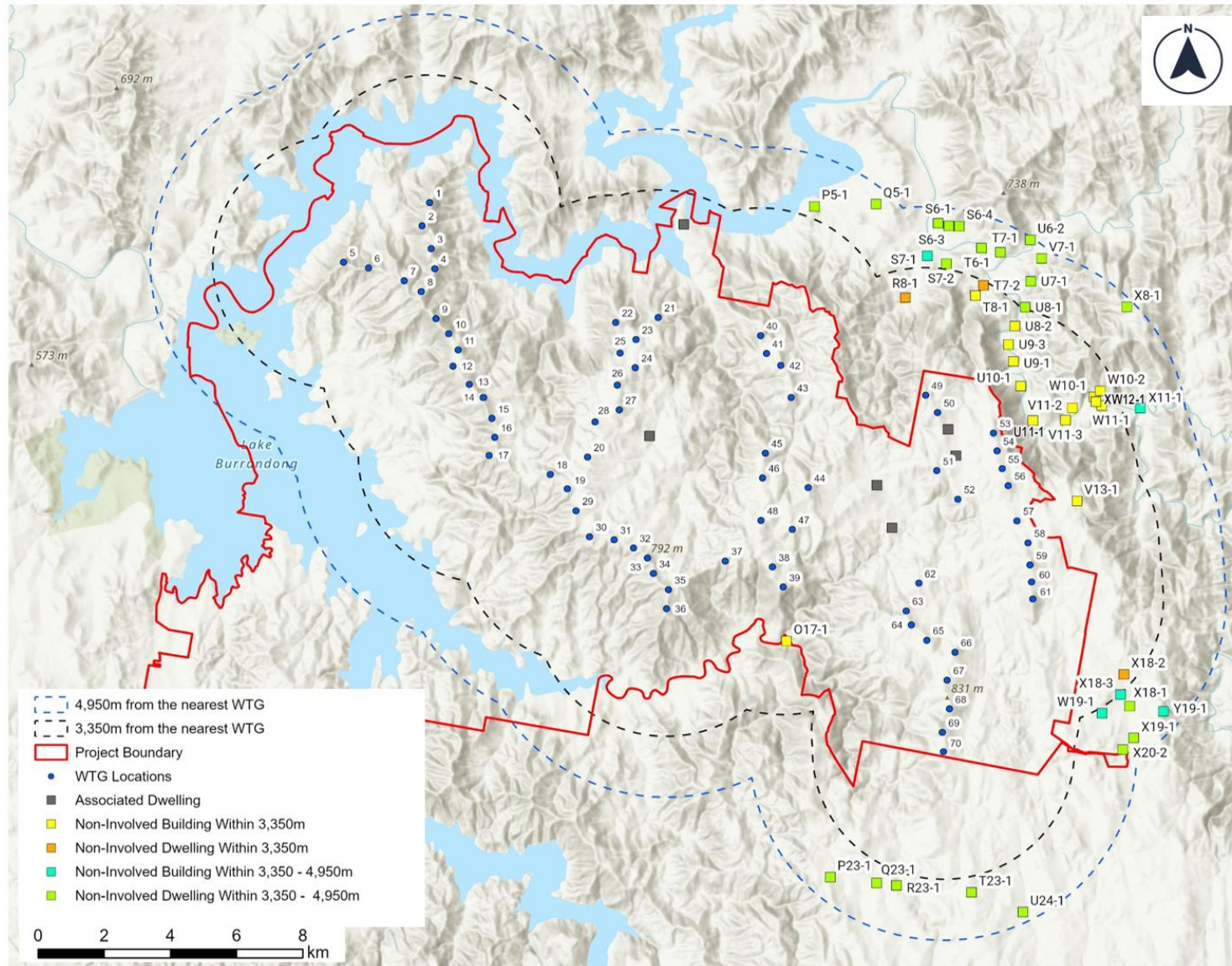


Figure 4-9: Updated LVIA receivers within the black and blue line of visual magnitude

VISUAL IMPACTS TO WORLDS END

A number of submissions were made addressing concerns on the visual impacts of the Project to World's End. Some examples of these concerns are listed below:

- *The World's End Ridgeline will lose its value as a scenic feature of the region*
- *As the owner of a property at worlds end rd, Worlds end nsw 2850 I object to the wind farm proposal due to the visual impact and property value decrease as I would see 4 of the windmills from my property and destroy the peaceful tranquility of my valley and the habitat of numerous wildlife*
- *I request the removal of the specified turbines from the proposal to preserve the scenic quality of Worlds End Ridgeline, shielding the highest density of dwellings from adverse visual impacts from the project.*
- *The project will have a detrimental impact to the scenic features of the World's End Ridgeline*

RESPONSE:

An assessment undertaken for the Worlds End Landscape Character Unit (LCU), including the ZVI mapping, indicates that the Project will be a visible element from Worlds End, with up to 11 WTGs visible from the valley floor (based on topography alone), refer to section 5.4 of Appendix D of the Amendment Report (MLA, 2026; ELA 2026a).

However, surveys to ground truth visual impacts indicated that intervening vegetation and topography will further limit views to the Project from the Worlds End area. A key landscape feature of this LCU are the steep vegetated hills to the west of the Meroo River (associated with Canning Sugarloaf) which restricts views to most parts of the Project. An extract of the ZVI figure has been provided as Figure 4-10 to illustrate the low level of visibility of the Project along the valley floor associated with Worlds End Road and Meroo River.

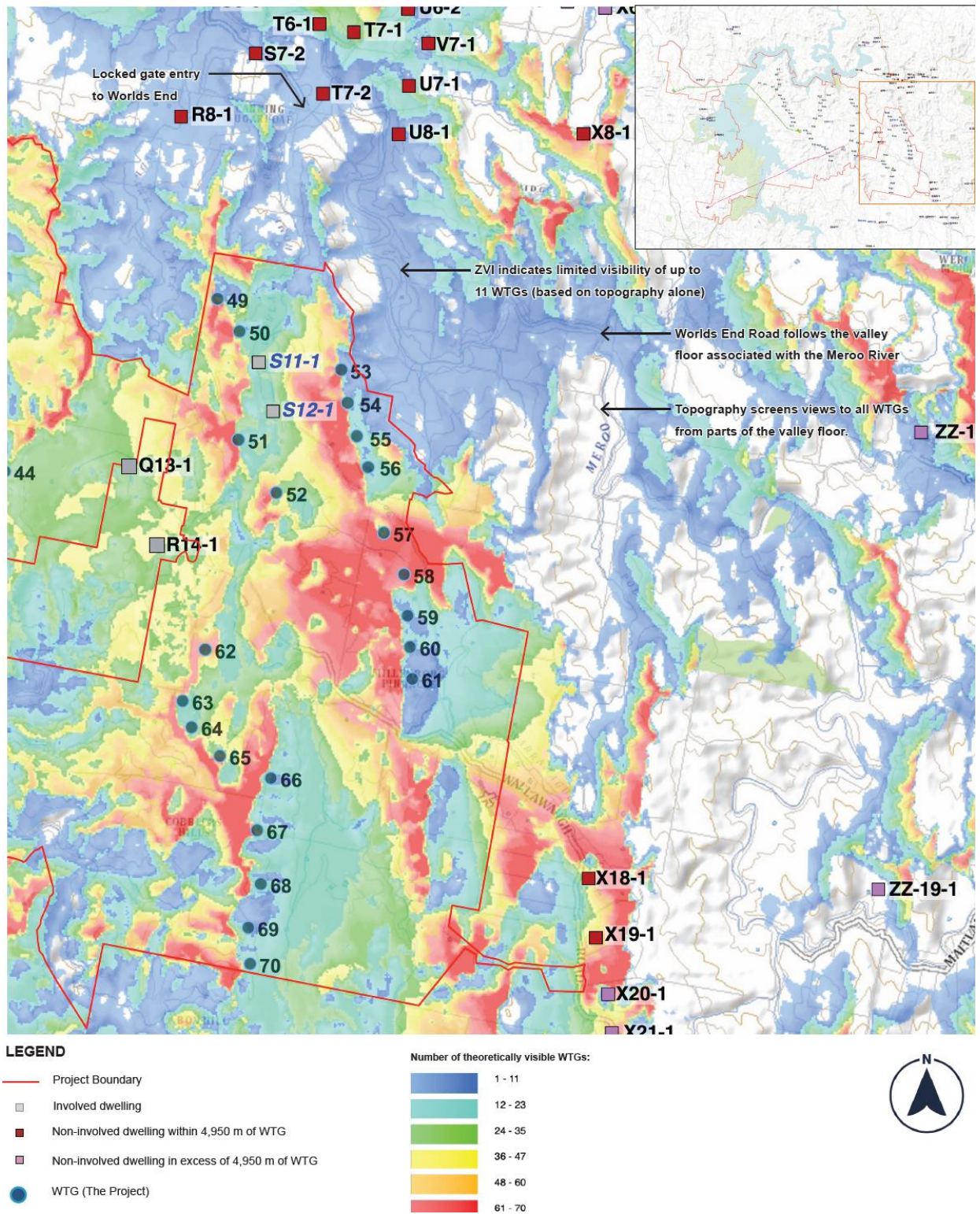


Figure 4-10: Results of the ZVI for Worlds End Road (Moir Studio 2026)

VISUAL IMPACTS ASSOCIATED WITH U8-1 (167 Rockford Lane, Yarrabin)

A number of submissions were made specifically regarding the visual impact to Dwelling U8-1 (167 Rockford Lane, Yarrabin). Some examples of these concerns are listed below:

- *If these wind turbines are put on the worlds end ridge line, it will destroy the whole purpose of this property and house*
- *The thought of this view being ruined by the inclusion of wind turbines is just unbearable*
- *The introduction of a wind farm would bring with it the intrusion of artificial lights, noise pollution and the unsightly presence of towering turbines on World's End Ridgeline. This would undoubtedly detract from the picturesque landscape that currently defines the area*

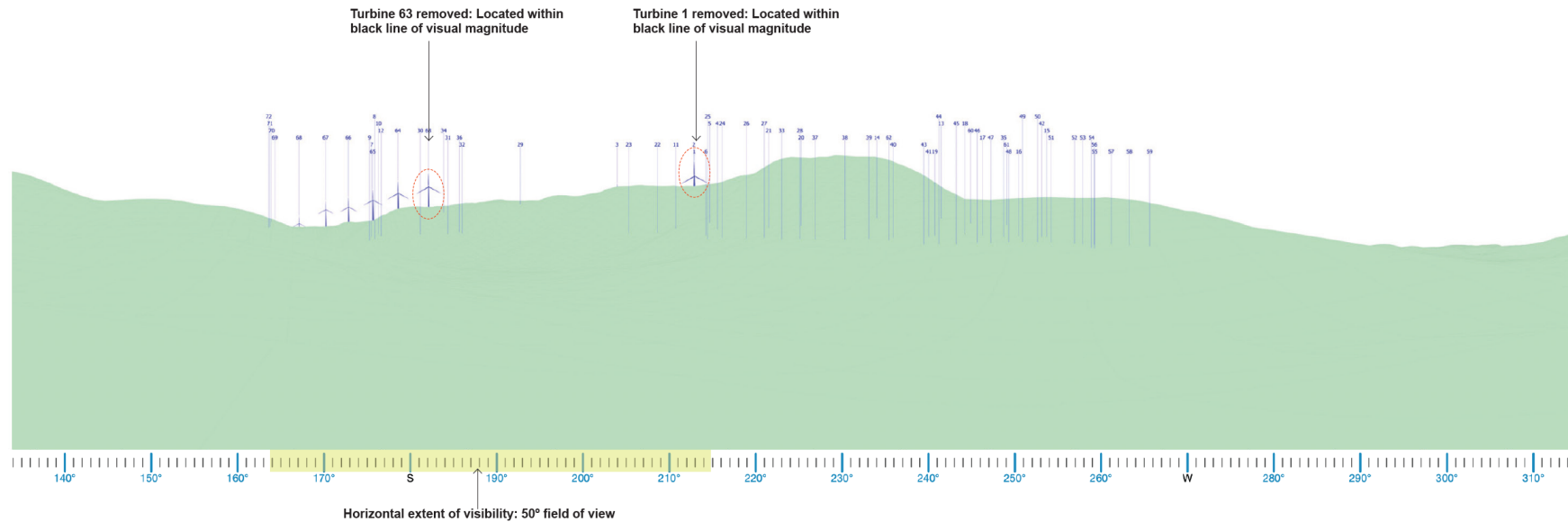
RESPONSE:

Multiple design iterations for various WTG configurations were undertaken during planning for the project with specific consideration given to the location of turbines in proximity to non-involved dwelling U8-1. MLA (2025) recommended the removal of turbines from within the black line of visual magnitude, being within 3,350 m of a WTG. This recommendation was actioned by the Proponent to reduce the potential visual impact from the dwelling prior to public exhibition of the EIS and resulted in a significant reduction of 28% in the visual impact associated with U8-1.

The detailed assessment of U8-1 determined the Project meets the visual performance objectives as per the Visual Bulletin (DPE 2016b) from this dwelling (refer to Appendix D.5 of the LVIA report). In accordance with the Visual Bulletin (DPE 2016b), the assessment of visual influence zones is undertaken from dwellings and public viewpoints. They are not taken within the general landscape and therefore are not representative of an entire property. The detailed assessment determined five (5) WTGs would be visible to the south of the dwelling. The turbines occupy 15 degrees of the horizontal field of view. No turbines are located within the black line of visual magnitude, being within 3,350 m of a dwelling, in accordance with the Visual Bulletin (DPE 2016b). Therefore, the impact of the WTGs on the visual amenity from the dwellings assessed at U8-1 are determined to be low based on the Visual Impact Rating outlined in Table 6-5 of the EIS.

Figure 4-11 provides an overview of the design iterations undertaken by the Proponent with the advice from MLA to reduce visual impacts from Dwelling U8-1 showing a further reduction in the visual impact of the Project by removing WTG 1 and 63.

Wire Frame Diagram Prepared from U8-1: 2022 Superseded Layout



Wire Frame Diagram Prepared from U8-1: 2022 Superseded Layout

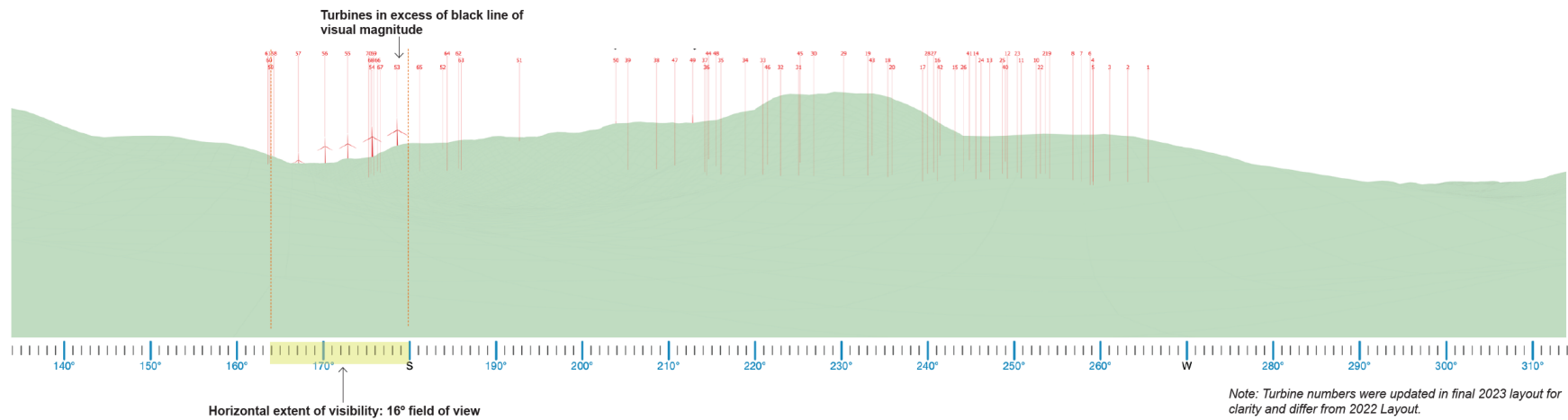


Figure 4-11: Wire Frame Diagram prepared from U8-1: 2022 Superseded layout (Moir Studio 2026)

CUMULATIVE VISUAL IMPACTS

A number of submissions expressed concern regarding the cumulative visual impact of the Project in relation to additional wind farm projects in the vicinity. Some examples of these concerns are listed below:

- *Piambong's turbines look set to be closer and more visible even than those of Burrendong. Was not Ark Energy obliged to consider the cumulative effect of this development before lodging their application?*
- *Looking at the Visual impact statement for both Burrendong & Piambong Wind farms both of these proposed Wind Farms are only doing an accumulated visual impact statement with Uungula Wind farm. Surely as all of these three projects effect the same residents of Yarrabin & Piambong each project should be doing an accumulated visual impact statements showing all three of the projects in their submissions.*

RESPONSE:

Within the EIS prepared by the Proponent, it is acknowledged that “the development of wind farms in rural environments will inevitably alter the visual landscape to a certain degree... and may alter the overall landscape character”. Given the nature and location of the Project in proximity to similar wind farms throughout the region, cumulative impacts are anticipated to occur, and it is acknowledged that the Project adds to the overall impact. However, cumulative impacts (including visual) will be relative to the location in which they are experienced, as only portions of certain projects may be visible at a given location.

The proposed Piambong Wind Farm is located to the northeast of the Project, north of Yarrabin Road and east of Twelve Mile Road. At the time of the EIS submission for the Project, details regarding the turbine layout for Piambong Wind Farm were not publicly available. SEARs had been issued for the Piambong Wind Farm on the 12th of December 2023 and therefore information regarding the Piambong project was not yet publicly available to adequately include in the cumulative impact assessment. It is noted that the Project was not considered in the Preliminary Landscape and Visual Impact Assessment prepared for the Piambong Wind Farm Scoping Report.

The proposal for the Piambong Wind Farm includes:

- Construction, operation and decommissioning of a wind farm with an estimated capacity of 551 MW, up to 81 WTGs and a maximum height of 230 m (to blade tip)
- Battery energy storage system up to 100 MW / 200 MWh
- Ancillary infrastructure including access tracks, operational facilities, underground and overhead electricity cabling, substations, transmission line and grid connection to the transmission network.

The cumulative visual impact assessment inclusive of the Piambong Wind Farm and the Project will be a requirement of the EIS submission for the Piambong Wind Farm. However, based upon available information associated with the Piambong Wind Farm, MLA has provided an addendum report as a high level overview of the potential cumulative impacts associated with the Project and Piambong Wind Farm in response to submissions made regarding the assessment.

The Multiple Wind Turbine Tool (MWTT) was used in the LVIA (MLA 2023), applying an 8 km radius to both the Uungula Wind Farm and the Project to identify any dwellings or viewpoints that may be present within 8 km of both projects. This tool was then applied by MLA to all non-involved dwellings within 8 km of the nearest WTG associated with both the Project and the Piambong Wind Farm (Figure 4-12). The results showed that 25 non-involved dwellings are located between the Project and the Piambong Wind Farm. Of these 25 dwellings, nine (9) had one (1) 60-degree sector occupied by at least one WTG, and 16 had up to two (2) 60 degree sectors occupied by at least one WTG

When considering turbines associated with the Ungula Wind Farm, the MWTT results in an increased number of dwellings with WTGs occupying more than two (2) 60 degree sectors. There are no non-involved dwellings within 8,000 m of all three wind farm projects (the Project, Ungula Wind Farm and Piambong). Therefore, the cumulative visual impact of multiple wind farms is restricted to any two projects at a time. Further cumulative assessment of the 25 non-involved dwellings identified will be undertaken in the Piambong Wind Farm EIS submission.

Overview of Cumulative Zone of Visual Influence

Aside from the application of the MWTT, the Visual Bulletin does not provide a methodology for further consideration of the cumulative visual impacts on the broader landscape. However, to assist in the cumulative visual impact assessment, assessment has been undertaken using viewshed mapping - also referred to as a ZVI figure. Two (2) ZVI figures have been prepared to show areas from which there is the potential to view both the Project and Piambong Wind Farm (Figure 4-13) and areas that all three projects (the Project, Ungula Wind Farm and Piambong Wind Farm) would be visible (Figure 4-14). The ZVI has been determined using digital topographic information and 3D modelling software, WindPro. The ZVI has been assessed to approximately 10 km.

The WTG locations and height (230 m) for the Piambong Wind Farm have been sourced from the Scoping Report as available on the Major Projects Website (December 2023). Due to topography, the ZVI figures illustrate variations in the extent of visibility of each Project. Opportunities to view the Project and Piambong Wind Farm simultaneously are generally limited to land between the two Projects, elevated positions to the far south of the Project and within the Project boundary. As presented in Figure 4-12, there are 25 non-involved dwellings located within 8,000 m of the Project and the proposed Piambong Wind Farm. Of the 25 non-involved dwellings, the ZVI indicates 17 have the potential to view both Projects. The extent of visibility and resulting cumulative visual impact from these dwellings is anticipated to be low as visibility of the Project is limited by topography and intervening vegetation. A detailed cumulative visual impact assessment will be prepared in the EIS for Piambong Wind Farm.

The ZVI prepared for all three (3) projects (Figure 4-14) has illustrated limited visibility of all three projects simultaneously. Opportunities to view all three projects at the same time are limited to land associated with the Project, and the project area associated with Piambong Wind Farm. Additionally, the ZVI identifies some areas of elevated land to the south of the Project have the potential to view all three projects at the same time, however these views would be distant. There are no non-involved dwellings identified within 8,000 m of all three (3) projects.

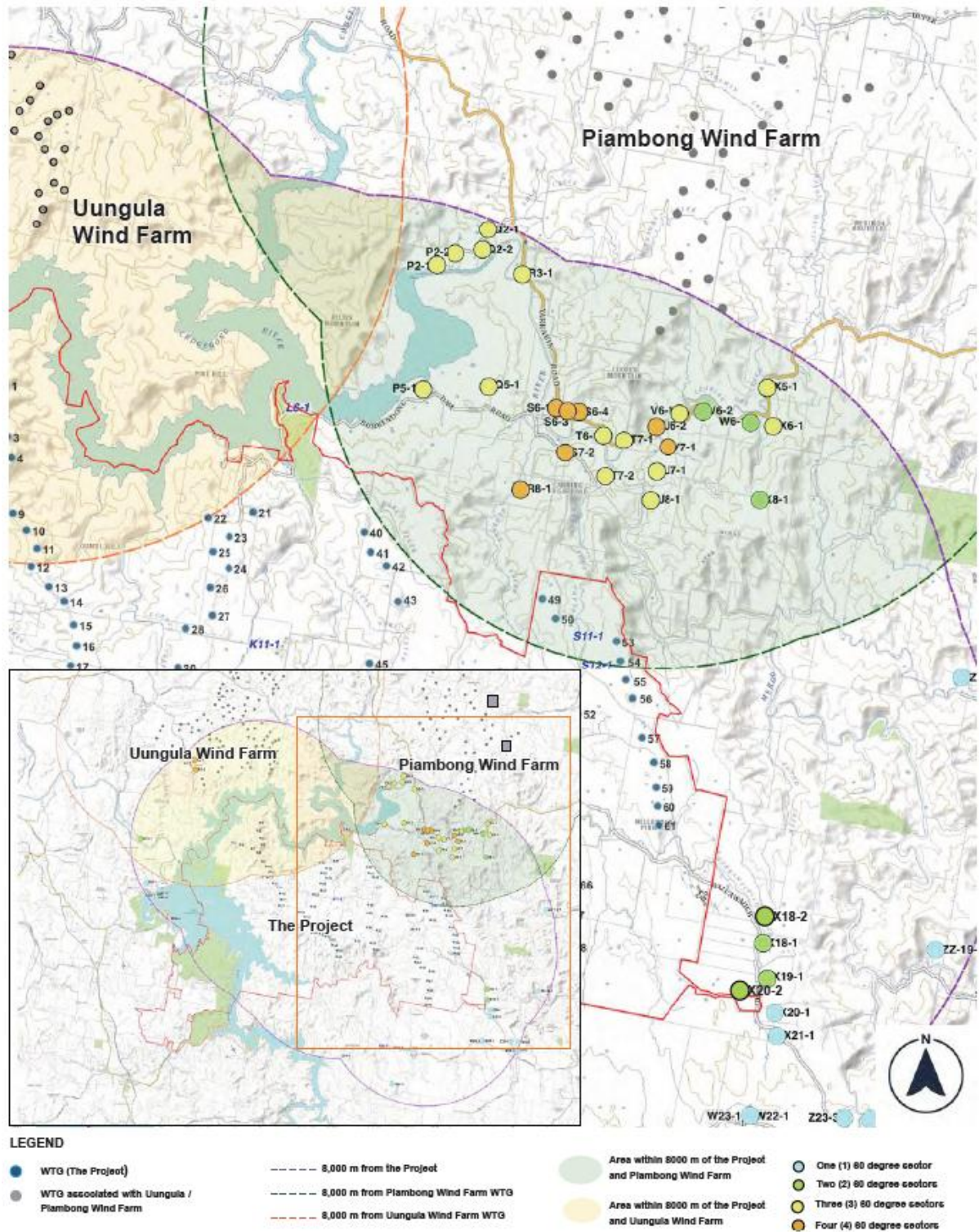


Figure 4-12: MWT considering the Project, Piambong Wind Farm and Uungula Wind Farm (Moir Studio 2026)

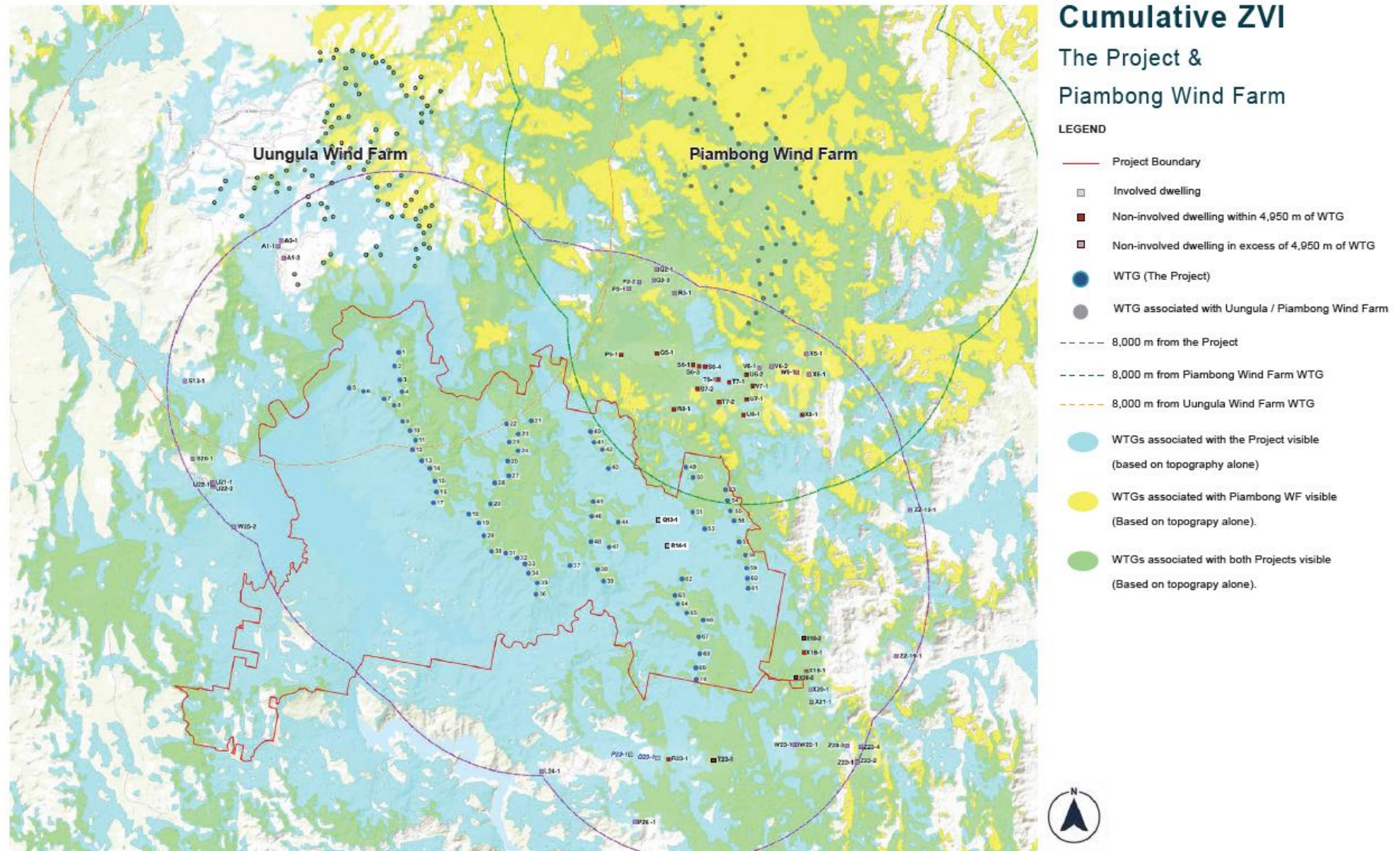


Figure 4-13: Cumulative ZVI with Piambong Wind Farm (Moir Studio 2026)

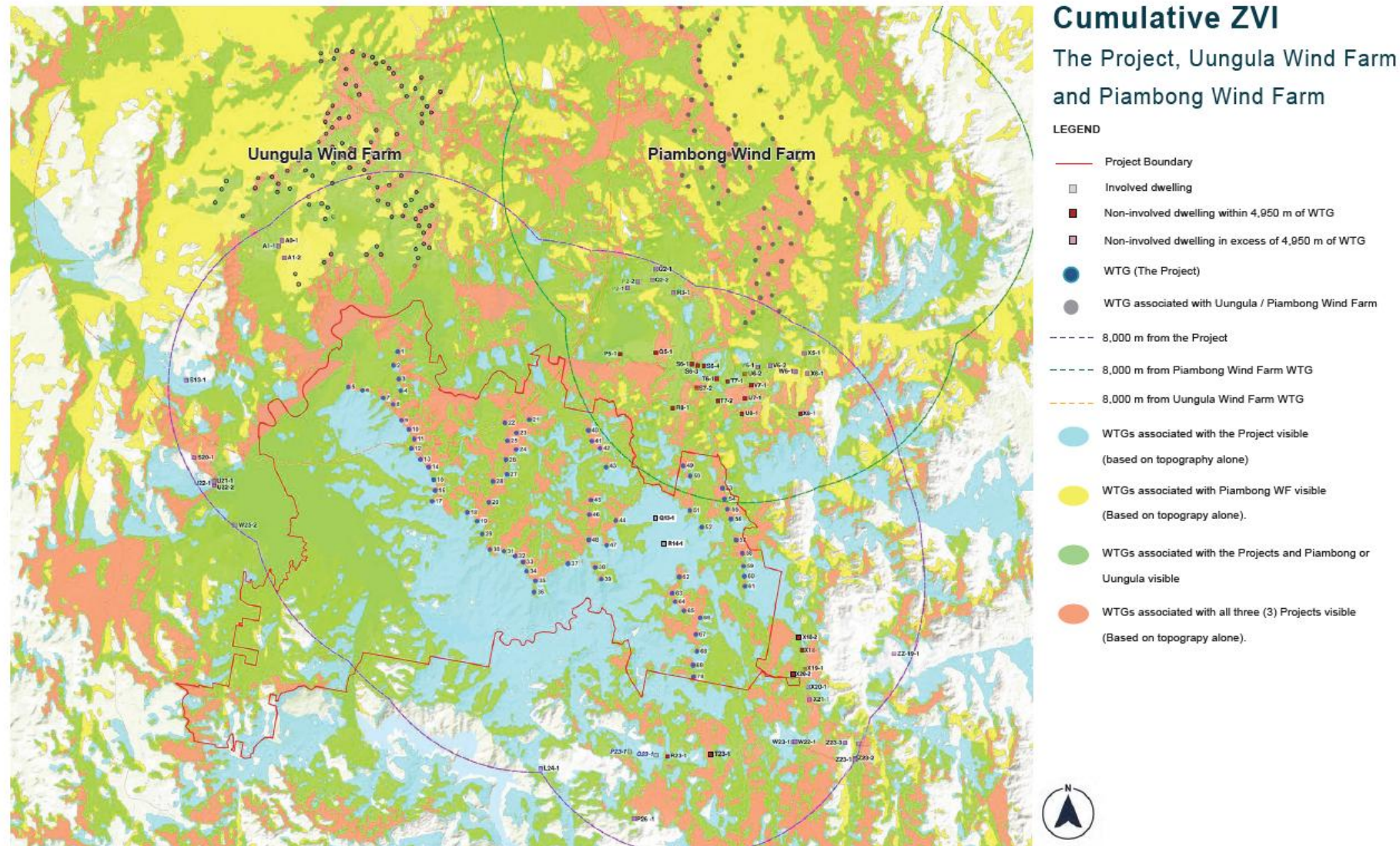


Figure 4-14: Cumulative ZVI with Piambong Wind Farm and Ungula Wind Farm (Moir Studio 2026)

4.3.1.2. Noise and Vibration

A number of submissions expressed concern regarding potential noise impacts of the Project. Some examples of these concerns are listed below:

- *There is no certainty or transparency in relation to any of the noise predictions contained in the noise assessment due to the potential for the chosen turbine locations to change (micro siting)*
- *Due to the rocky landscape, the noise created by the wind turbines will echo & travel through the valleys and impact the community living in the area*
- *Figure 6-10 [of the EIS] shows that no consideration was given to the residences in World's End. However, it appears that the majority of World's End will have predicted noise levels of up to 30 dB. So, from a very quiet location we now get the noise of the wind farm.*

RESPONSE:

The Proponent acknowledges the concerns raised by the community regarding the operational noise impacts of the Project, however the NVIA confirms that the highest predicted noise level at a non-associated receiver (R8-1 located 2.6 km from the nearest WTG) is 26.8 dB LA_{eq}, well below the criteria of 35.0 dB LA_{eq}, refer to Appendix E of the Amendment Report (MDA 2026; ELA 2026a).

4.3.1.3. Biodiversity

Impacts to Biodiversity were the most significant sub-theme that received public submissions. The concerns ranged from several issues regarding impacts to specific species, flora and fauna in general, impacts to the landscape and waterways, to air, etc. Given the number of submissions and varying issues raised, this section provides a summary of example issues.

Impacts to Koalas and Koala habitat

Some examples of these concerns are listed below:

- *There has been no care that koalas live in the area and will be greatly affected.*
- *This project will also damage the local environment. This project will destroy the local protected koala habitat.*
- *This project will destroy the local protected koala habitat*
- *studies demonstrated that wind turbines and koalas don't combine well, they are either clubbed to death when found in a felled tree or their breeding calls are compromised by turbine noise.*
- *In Appendix H - Biodiversity, Koalas are listed as of concern and some evidence of them being close to the Biodiversity sample sites were recorded. The report also shows that the NSW Listing Status as Vulnerable as does the EPBC Listing Status however this is different to the NSW Threatened Species Scientific Committee (TSSC) as of 20 May 2022 listing Koala - Phascolarctos cinereus as an endangered species. Farmers and other community that have association with the project area have seen a continued decline of these animals from the 1980's to present and there are real fears that this endangered species will be negatively impacted due to loss of habitat due to the clearing of their forage source.*

RESPONSE:

Surveys for Koala have been undertaken across the Project Site within known PCTs associated with this species. Surveys for Koala included spotlighting and call playback over twenty-four (24) nights at twenty (25) locations (288 hours) within the Project Site. During call playback a faint reply call of a male koala was heard. A male was also heard call during a subsequent site visit. Given the recent sightings in the broader landscape, i.e. at Grattai, Hargraves, World's End, along Hill End Road and surrounds, it is likely that koalas are present, although in small numbers. An individual was recorded near BBUS location Impact 11 on 5 February 2025. Species credits have been calculated for this species.

Areas identified as important habitat for Koala breeding are PCTs associated with feed trees. All twelve (12) PCTs are associated with Koala feed trees (PCT 76, 84, 266, 270, 272, 274, 277, 281, 287, 312, 331, 461). All PCTs were put in the BAM-C. Koalas were not recorded on Yarrabin Road so these areas are not included in the credit calculations. Habitat along the roadside is not contiguous with the Windfarm. A total of 647.8 ha has been included within the BAM-C for the Koala which has resulted in substantial offset obligation which will ensure a net positive outcome for this species.

Felling Trees

As noted in the EIS (ELA 2023a), a Biodiversity Management Plan (BMP) will be prepared for the Project prior to construction and will include a mitigation measure requiring a certified ecologist to inspect trees to ensure that no animals, including Koalas, are present within tree hollows, nests, and the tree in general before being cleared and therefore avoiding injury as a result of felling.

Flora and Fauna Assessments

Some examples of these concerns are listed below:

- *The effects to flora and fauna are massive let alone the possibility of contaminants entering the water system.*
- *Ark energy have not done adequate native flora and fauna studies in their biodiversity assessment, there are many many rare and threatened species here. It is also a direct flight path for the Regent Honey Eater Bird and home to many different species of grass wrens, blue and red backed fairy wrens all the way up to wedged tail eagles. There are platypus and 100+ year old mussels, endangered catfish in the river that only survive because of how clean our area is, different rock wallaby species, lots of owls, major Mitchell cockatoos, native peas, a lot of different species of bats.*

RESPONSE:

The flora and fauna within the Project Site have been surveyed and assessed in accordance with the BAM. The revised BDAR (ELA 2026b) outlines the survey methods undertaken to determine the PCTs across the Project Site, which results in the targeted threatened flora and fauna species that were required to be undertaken across the Project Site. Where threatened species surveys did not meet current guideline requirements, they were assumed to be present within their representative PCTs and are included as part of the offset obligations for the Project. Further details regarding targeted threatened flora and fauna species and associated surveys are outlined within the revised BDAR (ELA 2026b).

Indirect impacts and prescribed impacts associated with the Project have been addressed within the revised BDAR and appropriate mitigation measures to address the potential indirect and prescribed impacts is provided within Appendix C of the Amendment Report (ELA 2026a) and revised BDAR (ELA 2026b).

A Preliminary Site Investigation Report has been undertaken to establish the past and present potentially contaminating activities as well as an assessment of the potential contamination that may occur as a result of the Project (Ramboll 2025). The past and present use of the Development Corridor predominately cleared agricultural land with potential contaminants likely (but not limited to) from heavy metals, pesticides and herbicides and asbestos. There is a low risk of contamination of soil surface or groundwater.

As a result of the Project, the following measures will be adopted to minimise potential impacts and contamination:

- Should excavated soil be required to be disposed of offsite, it is required to be appropriately characterised in accordance with NSW EPA (2014) Waste Classification Guidelines

- Development of an unexpected finds protocol to be implemented during the construction phase of the project, and during any excavation work required during the operational phase. Unexpected finds pertaining to contamination include, but are not limited to, stained, discoloured, fibrous or odorous soil; stained, discoloured or foaming surface water; and stained, discoloured groundwater or the presence of Light Non-Aqueous Phase Liquid on top of groundwater.
- Prepare and implement an ASS Management Plan if excavation works are required in areas mapped as medium or high risk of ASS during construction.

Impacts to Birds and Bats

Some examples of these concerns are listed below:

- *They have mentioned there is no roosting within the proposed wind farm yet no mention of the impact of bats and birds flying at night and being killed*
- *In Appendix H - Biodiversity, Section 10.8 on page 42, there is High Concern of Collision Strike Modelling for At Risk Species, of which there are 4 listed and two additional of high concern. Of High concern are the White-Striped Freetail Bat and the Wedge Tail Eagle. For Local Aboriginal Community the Wedgetail Eagle or Maliyan is a Creation Spirit and for Some a Totem which makes these birds sacred to us. The High risk of collision is unacceptable. Community have also noticed a decline in the number of Wedge Tailed Eagles in the area compared to the mid 1990's and further loss may see them decline to the point of not being able to breed or have a population that is sustainable.*

RESPONSE:

Impacts to birds and bats has been addressed previously within the response to BCS in Section 4.1.1. The revised BDAR (ELA 2026b) has considered potential impacts to high-risk birds and bats, including the Wedge-tailed Eagle and White-striped Freetail Bat. Updated Collision Risk Modelling has been undertaken, including additional data collected since the exhibition of the EIS, and is provided in Section 6.4, Section 6.5 and Section 6.6 of the revised BDAR (ELA 2026b).

To mitigate impacts to bird and bats, a BBAMP will be prepared for the Project prior to construction and will include the results of two (2) consecutive years of data collect through BBUS and a revised CRM based upon the results of the BBUS. The BBAMP will include mitigation, management and monitoring strategies for high-risk species, and will a TARP for those high-risk species.

Biodiversity Offsets

One submission was received regarding environmental offsets and the use of biodiversity credits. The submission is outlined below:

- *All environmental offsets should be procured within the local area close to the project, the use of Credits does not sit well with the Aboriginal and other local community.*

RESPONSE:

To offset the loss of vegetation and threatened species habitat with the Project Site, the revised BDAR (ELA 2026b) has presented the required ecosystem and species credits required. A total of 18,569 ecosystem credits and 38,886 species credits are required to offset the residual impacts of the Project. Section 10.2 of the revised BDAR (ELA 2026b) outlines the specific ecosystem credits and species credits required for the Project. The Proponent is currently investigating land-based offsets within the Project Site in order to meet the biodiversity offset obligations.

The Proponent has engaged environmental consultants to investigate the most appropriate biodiversity offset strategy for the Project. This process includes consideration of both land-based offsets through a Biodiversity

Stewardship Site within the locality of the Project and Strategic Biodiversity Offset Delivery Agreements, as provided under the BC Act (as amended in 2025).

4.3.1.4. Traffic and Transport

A number of submissions expressed concern regarding the impacts of the Project on traffic volumes and quality of existing roads. Some examples of these concerns are listed below:

- *I object to the Burrendong wind farm project because concerns of increased traffic on school bus routes.*
- *We currently see 1-5 cars travel along our road per day and rarely any of a night, during construction there will be 200+ cars not including the heavy machinery bringing the turbine blades in, the vehicles and machinery to upgrade the road, and cement trucks. Ark energy has taken their daily vehicle tally from a different point on Yarrabin road and have not given a true report in the EIS*
- *It states that the average traffic volume of the yarrabin road is 201 cars per day. This is the average traffic volume from the hill end road turn til the burrendong dam road intersection. There is no data from the burrendong dam turn to the 12 mile intersection. At our house we have an average of 4 cars a day. There has been no study on this section of road so the information is false.*
- *States that there is to be 203 vehicles a day, big increase from a 4 car a day average.*
- *the executive summary which states that only 375 positions over the construction period. But the traffic report only has 153 vehicle movements one way per day. So, with up to 650 full time workers on site during construction it appears that each car will need to carry 4.24 people each trip? Obviously, this is not possible.*
- *I don't know what roads they are driving on but access to the site is not on good roads but are on roads that have not been engineered to carry the expected traffic generated from the wind farm.*

RESPONSE:

Increased Traffic Volumes

As discussed in the TTIA prepared by Stantec (2026) , the expected number of construction workers is 250 FTE and is based on project experience of similar projects. It is anticipated that only between weeks 50 -59 will the construction workforce exceed 200 FTE workers. Figure 4-15 below demonstrates a histogram of the estimated construction workforce for the duration of the construction phase, with the majority of the period experiencing a workforce of less than 150 FTE. Most of the workforce light vehicle daily traffic will be mitigated by the inclusion of an on-site TWAF which is included in the amendment report as part of the project's temporary infrastructure. The TWAF is proposed to house 100% of the non-local workforce and reduce worker traffic by 89%. The updated traffic impact assessment can be found in section 5 of the revised TTIA, Appendix H.1 to the amendment report (Stantec 2026, ELA 2026a) and for details about the TWAF refer to Appendix A.2 of the Amendment report (Barson 2025, ELA 2026a)

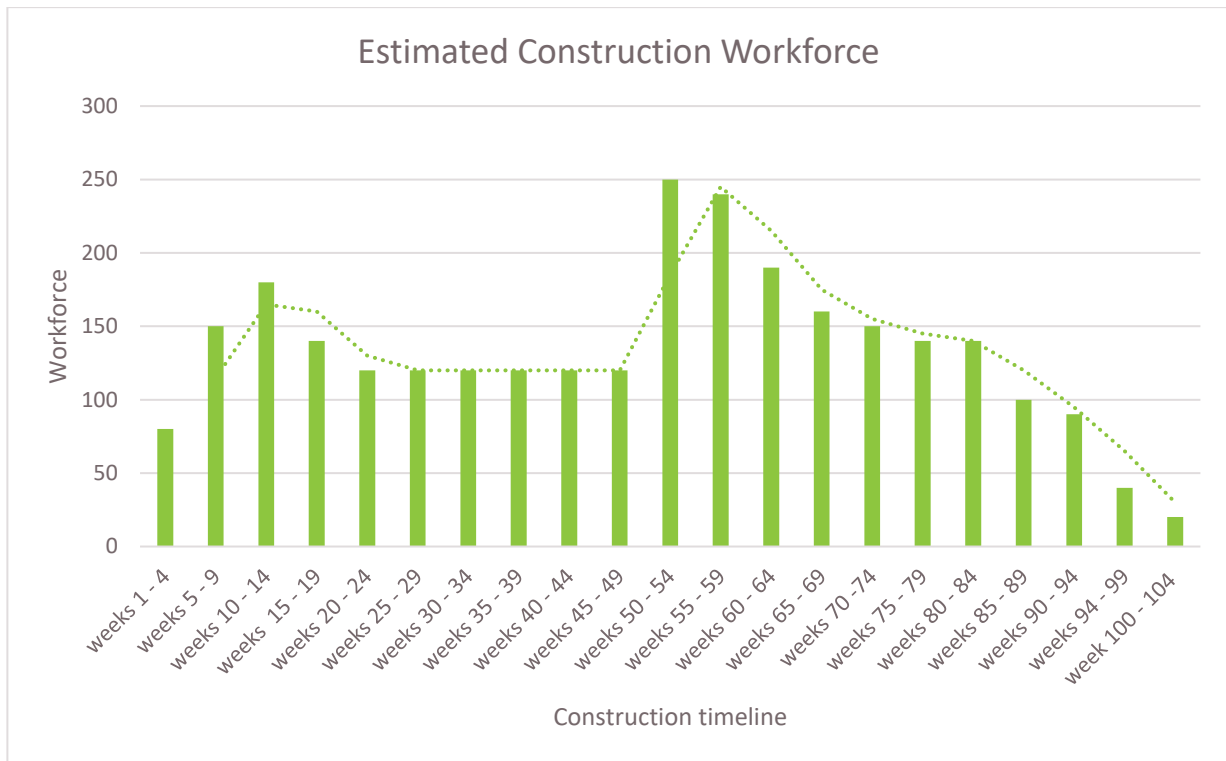


Figure 4-15: Estimated Construction Workforce for during the 2 year construction period

Existing Road Quality

Yarrabin Road

A number of submissions were received that directly referenced potential impacts to users of Yarrabin Road as well as landowners in proximity to the road, with concerns regarding increased traffic, impacts of road upgrades and potential noise and visual impacts. A number of measures have been undertaken since the exhibition to help minimise these impacts, as shown in Appendix C of the Amendment Report (Stantec 2026; ELA 2026a).

The implementation of a Temporary Workers Accommodation Facility within the Project Site will have a significant impact on reducing daily traffic related impacts on Yarrabin Road and other local roads.

4.3.1.5. Aviation

Submissions were received in relation to the impacts of the Project on aviation activities and flight paths. Some examples of these concerns are listed below:

- *what consideration was reviewed regarding air plane flight paths in our area will they be changed?*
- *Also, from time to time the Airforce uses Worlds End valley for low flying practice. Would suggest that the Wind Farm approach the Airforce in regard to this*

RESPONSE:

Flight Paths

The Proponent has consulted with CASA and Airservices Australia (ASA) as outlined in the EIS (ELA 2023a). The location of all proposed WTGs is below 1,085 m AHD and therefore:

- will not penetrate any OLS surfaces

- will not impact nearby designated air routes
- will not impact the Lowest Safe Altitude (LSALT) for nearby designated air routes.

Aviation Projects consulted with the operators of Mudgee Aerodrome as part of the Aviation Impact Assessment undertaken as part of the EIS (Aviation Projects 2023; ELA 2023). twelve WTGs will impact on the PANS-OPS surface by infringing on the minimum segment altitude of the initial RNAV RWY 04 for Mudgee Aerodrome. This will require the segment altitude to be raised from 3,900 ft to 4,500 ft. The current recommended altitude for approach to Mudgee Aerodrome is 4,800 ft and therefore the increase in minimum altitude to 4,500 ft will not affect the landing procedure for aircraft, nor any flight paths required for approach to Mudgee Aerodrome. There were no other changes necessary to other aerodromes in the vicinity of the Project.

Turbulence caused by the rotation of turbine blades upon aviation operations has been considered. Turbulence from WTG blade rotations can be potentially noticeable up to 16 times the diameter of a turbine blade. Given the proposed rotor diameter will be up to 180 m, potential downwind turbulence could occur at 2.88 km from a proposed WTG. During the Aviation Impact Assessment (Aviation Projects 2023), it was confirmed that no identified aircraft landing areas or certified aerodromes occur within a 2.9 km radius of any Project WTGs and therefore wake turbulence will not impact aerodrome operations.

An analysis of the seven (7) nearby air routes was conducted as part of the AIA (Aviation Projects 2023). The analysis revealed no impacts from the Project on airspace design or operations.

Air Force Operations in Worlds End

Aviation Projects consulted the Department of Defence (DoD) about any issues or recommendations the DoD had associated with the Project. The DoD requested the implementation of lighting requirements for WTGs in line with IAW MOD Part 139, Section 9.31, subsections (8) and (9). No reference was made to low flying practice operations in the Worlds End valley. The implementation of lighting requirements has been previously addressed in Section 4.1.1.

The Proponent will continue to maintain communication with all relevant agencies and authorities throughout the construction and operation of the Project, including the DoD. Furthermore, the Proponent has committed to provide ASA with 'as constructed' details for all WTGs following construction, which can be used by the DoD to inform aerial training routes, including within Worlds End.

4.3.1.6. Bushfire and Electrical Fire

Submissions were received in relation to the potential impacts of bushfire events, including as a result of Project infrastructure. Some examples of these concerns are listed below:

- *In addition, if bushfire was to impact our community suppression efforts would be hampered and aerial firefighting will be impeded by the WTG, increasing risk of loss of life and property damage*
- *The EIS has not made any reference to the use of the dam by RFS contractors that use aircraft in fire fighting*
- *Bushfires already pose a threat to the locals. But with these terrible monstrosities, filled with fuel, the likelihood is that the already distant fire brigade will have little to no hope of stopping the threat.*
- *We live in a high bushfire prone location and with turbines around NO helicopter water drops will be possible, this puts human lives, property, pets, livestock, and wild life at increased risk of bushfire.*

RESPONSE:**Bushfire Events**

A Bushfire Risk Assessment (BRA) was completed for the Project (Section 6.7.2.5 of the EIS (ELA 2023a)) in accordance with the NSW RFS *Planning for Bushfire Protection* (PBP) 2019. In accordance with the SEARs, the assessment of hazards and risks associated with bushfire included potential sources of ignition from:

- WTGs due to electrical or mechanical faults
- Faults in a substation or associated powerline infrastructure
- Structural building fires
- Use of or inappropriate storage of flammable fuels
- Utilisation of machinery and equipment
- Land management activities (APZ management, vegetation management along access track/powerlines)
- Construction or maintenance activities (e.g. welding, grinding, or other ignition generating works)
- Other anthropogenic sources (e.g. from a discarded cigarette, cooking fires, fire starts from vehicles, etc.)

The BRA determined that the likelihood of fire events being ignited from the Project are unlikely to occur. Additionally, several Project mitigation measures have been proposed that would further reduce the potential of bushfires both impacting the Project and being caused as a result of the Project.

Wind Turbine Generators

Section 3.2 of the EIS provides details on the elements involved in the Project, including the components of the WTGs to be used. Fires in modern WTGs are relatively infrequent, with publicly available information suggesting a rate of between 1-in-2,000 to 1-in-15,000 per year (Krcmar 2021). The cause of fires from WTGs are often in relation to:

- inadequate fire detection systems in place (e.g. control and monitoring systems, heat/smoke detection systems, etc.)
- little to no onsite fire suppression resources
- poorly implemented fuel management practices (APZs, etc.) around Project Infrastructure.

As discussed in the BRA, the Project would be constructed in accordance with PBP 2019 which requires appropriate fire detection systems, onsite fire suppression and the implementation of fuel management zones around all Project Infrastructure to combat potential spread of fire on site. Furthermore, while some fuel may be kept onsite to run generators or other plant requiring fuel to run, modern WTGs do not contain fuel within the towers themselves.

Firefighting Operations

As noted in the EIS, volunteer fire-fighters from nearby RFS brigades would likely be the first to respond to a bushfire within the Project area, being Piambong, Grattai, Hargraves, Windeyer, Lawson-Cudgegong, Mount Arthur, Neurea Seven, Dripston, and Wuuluman brigades.

Regarding the impact of the Project on aerial fire-fighting capabilities, the Proponent has consulted with both CASA and the RFS, neither of whom have highlighted concerns regarding an inability for aerial fire-fighting operations to occur. If a bushfire occurs in proximity to the Project, individual WTGs can be safely stopped to further assist the safety of aerial operations, including the use of helicopter fire-fighting. The Australasian Fire and Emergency Service Authority (AFAC) policy considers that wind turbines do not present a significant hazard to aerial firefighting (AFAC 2018).

The use of Burrendong Dam to assist in fire-fighting operations is a consideration for the RFS and relevant agencies, and it is not within the scope of the Proponent to consider whether Burrendong Dam would be used as a water source for aerial fire-fighting operations. However, it is acknowledged that it is likely that it would be used given the proximity to the Project Site and the availability of water.

4.3.1.7. Aboriginal heritage

One (1) submission was received with regard to Aboriginal heritage and the Project. The submission is provided below:

- *All tracks that are to be used by this project should be fully surveyed to ensure that Aboriginal Cultural Heritage Material will not be destroyed by heavy vehicles or machinery. Any un-surveyed areas of which there are sections in maps within Appendix N - Aboriginal Cultural Heritage must be surveyed. This includes the actual route and locations of powerlines. – Wellington Valley Wiradjuri Aboriginal Corporation*

RESPONSE:

Survey Tracks

Following consultation with relevant Aboriginal stakeholders and Heritage NSW, additional surveys have been conducted within the Development Footprint to ensure any Aboriginal Cultural Heritage Material has been identified and appropriate mitigation measures proposed. Further information regarding additional survey efforts is discussed in Section 4.1.10 and the revised ACHA Report in Appendix L of the Amendment Report (ELA 2026a).

4.3.1.8. Water, Landuse and Soils

Land Use and Soils

A number of submissions expressed concern regarding the potential impacts of the Project on soils and the capability of the landscape. Some examples of these concerns are listed below:

- *The project is predominately located on privately owned agricultural land used for agricultural purposes. Where is all the food and fibre going to be grown to feed and clothe Australians when this is added to all the agricultural land being taken for renewable factories*
- *This transition has the potential to take thousands of hectares of land out of food and fibre production (killing small farming communities)*

RESPONSE:

The Project will have a very limited impact on existing agricultural activities. As part of the EIS process, a land use and soil assessment was conducted to assess impacts to land use and soils within the Project Site. As discussed in the EIS, the Land and Soil Capability (LSC) of the Project Site is almost entirely classed as LSC 6 and 7 (over 95%) as shown in Figure 4-16. This represents low to very severe land capability limitations which would not make the areas used for the Project suitable for agricultural activity beyond grazing in LSC 6 and LSC 7 areas.

The assessment notes that some areas of existing primary land use within the Development Footprint will change from agriculture to electricity generating works. However, agriculture and grazing can still occur beneath WTGs in most areas. It is also noted that the agricultural productivity of land to be used for the Project Site is largely unproductive and does not significantly contribute to the production of food or fibre products. One of the submissions expresses concern that the transition to renewable energy more broadly could remove thousands of hectares of land for food and fibre production and kill small farming communities. While the broader context of agricultural land being used for the renewable energy transition is considered outside of the scope of this report, it is noted that the Project Site has a proposed Development Footprint of approximately 733 ha and largely avoids the most highly capable agricultural land. The Project has been designed in a way to also allow for the continued

use of grazing practices within the Project Site further reducing the impact to agricultural productivity to only within the required cleared areas within the site.

The Proponent will prepare a Decommissioning and Rehabilitation Management Plan, post approval. Within that plan will be measures to facilitate the rehabilitation of disturbed land within the Project Site during the construction, operation and decommissioning phases. This will support reducing impacts to soil and will include measures to avoid the introduction and/or spread of weeds and potentially restore soil health.

Permanent compound areas, such as Operations and Maintenance Compounds, substations, etc., will result in more material impacts to land capability. However, these areas are small in the context of the Project and will be decommissioned at the end of the Project and rehabilitated to as close as practicable to the existing site condition.

The Decommissioning and Rehabilitation Management Plan will outline how rehabilitation will be undertaken.

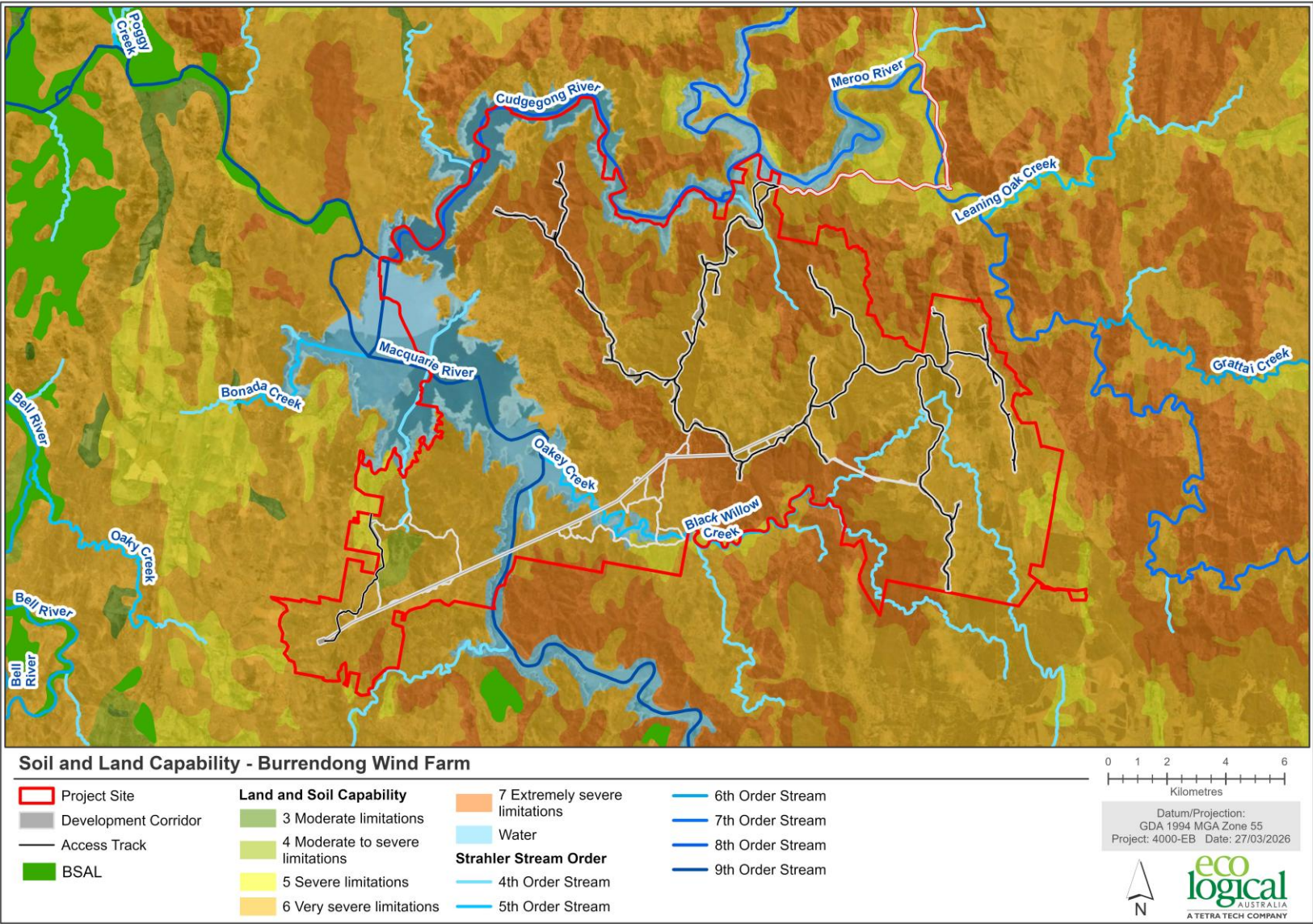


Figure 4-16: Land and Soil Capability of the Project Site

Naturally Occurring Asbestos (NOA)

A number of submissions expressed concern regarding the potential for exposure of asbestos as a result of the works. Some examples of these concerns are listed below:

- *They identified Naturally Occurring Asbestos but have not written how this is NOT going to affect the community once disturbed*
- *They have identified Naturally Occurring Asbestos but have not really considered how to control the dust but only state that it will blow away. Details on control methods that will be used need to be supplied so that adequate comments can be made.*

RESPONSE:

The EIS (ELA 2023a) discussed the presence of geological units comprising serpentine minerals with the potential for NOA to occur. As seen in Figure 6-48 of the EIS (ELA 2023a), these geological units are generally located a minimum of approximately 5 km from the Project Site. It is also important to note that these geological units are considered to have a *low asbestos potential* and do not guarantee the presence. It is not within the scope of the Project that these areas will be disturbed, and therefore any risk that these natural features present will not be generated from Project related activities.

Additionally, there is a small portion of the Project Site that has been mapped as having low asbestos potential geological units. This potential NOA is in an area where access track construction is proposed and not in proximity to works that would involve excavation activities. Naturally occurring asbestos is not found at surface level, and rather requires excavation to expose the asbestos potential materials. The depth at which works associated with access track construction will be undertaken is unlikely to be deep enough to disturb potential NOA, presenting a low risk to the community.

However, in the unlikely event that NOA is encountered during civil works, two mitigation measures have been proposed to manage the exposure of this material. The mitigation measures involve:

- CT008 – Implement active and preventative dust suppression controls in the case that serpentine minerals are observed to ensure airborne particulate matter generated during construction activities are either minimised or contained. Note that the below measures are for dust and particulate matter if NOA is suspected by encountering serpentine minerals and includes:
 - Immediately cease all dust generating activities during high wind conditions or where airborne dust is visible
 - Use of water sprays during dust generating activities (excavations, drilling, earthworks, etc.)
 - Use of water sprays on disturbed surfaces and uncovered stockpiled materials
 - Spraying unsealed haulage roadways with the use of a water card
 - Reducing on-site vehicle speeds on unsealed roadways
 - Covering and/or containing (2-3 walls) excavated materials
 - Covering outgoing loads of excavated materials
- CT009 – *Should serpentine minerals or potential NOA be encountered, appropriate decontamination of equipment and personnel will be conducted at the end of each work day.*

These measures are designed to ensure that should NOA be encountered within the Project Site, any disturbed NOA material is appropriately collected and disposed of safely to ensure that NOA particles do not become airborne and potentially impact on the wider community.

Sourcing Water

A number of submissions expressed concern regarding the potential impacts of the Project on water availability, quality, and access. Some examples of these concerns are listed below:

- *Studies are yet to be completed on groundwater availability but it is acknowledged that there is a paucity of groundwater. Where is the water for the construction of the cement foundations for Wind Turbine Towers coming from? At Crudine neighbours ran out of groundwater in the midst of a drought*
- *Water is not plentiful and with hot dry summers will be less so. Locals will not be happy to have the thousands and billions of litres of water taken from the district for this project*
- *Stock and domestic water has priority; how does Ark Energy plan to manage water use if the construction timeline happens to coincide with a dry period?*

RESPONSE:

Potential impacts during the construction of the Project on surface water and groundwater resources will be monitored by the Proponent in accordance with the consent conditions and other applicable legislation and policies. The Surface Water Impact Assessment (ELA 2024a) has been revised and included as Appendix M of the Amendment Report (ELA 2026a). The revised assessment has considered the volumes of water required primarily for the construction phase of the Project.

It is anticipated that the Project will require between 850 (wet year) and 1,400 (dry year) ML/year for dust suppression needs. The construction phase is expected to take between 18 months and 2 years. Over this period, therefore, it is estimated that between 2.6 and 3.8 GL water will be required, not including requirements for workers accommodation. The TWAF estimated water requirement will be approximately 33 kilolitres per days based upon a 225 person camp therefore, it is estimated that between 18.4 and 24.5 ML water will be required during the operation of the TWAF (Barnson 2025).

The revised assessment has considered the source of the water supply. The water supply would primarily be for dust suppression which will be sourced from an appropriate location with the relevant licences. The sources of water under consideration include the nearby are the Macquarie River, Cudgegong River, Burrendong Dam and catchment farm dams (used for stock). Whilst some water may be sourced from farm dams, the volume of water required will exceed the water availability from this source. Therefore, water will need to be sourced from the other nearby options or alternative water sources (with relevant licences).

An alternate supply may come from registered groundwater bores. Whilst yields from the Lachlan Fold Belt Fractured Rock Groundwater Source are likely to be low (1-2 L/s), these can be used to fill temporary water tanks or augment existing farm dams to provide storages for the water tankers. Currently, this water source has significant capacity below its sustainable yield.

As outlined in the revised Groundwater Impact Assessment (ELA 2024b), there is significant unassigned groundwater in the Lachlan Fold Belt Fractured Rock Groundwater Source (up to 668 GL/year), a portion of which could be utilised during construction with storage facilitated by local farm dams and temporary storages that can be transported as required to follow the construction footprint and removed following commissioning of the WTGs and ancillary infrastructure. The specific source of water for the construction needs is still under consideration and no agreements have been implemented to date. The Proponent is making efforts to identify a suitable source or sources, but this will likely be post-approval and within the Water Management Plan.

Post construction, during the operation of the WTGs, the water requirements are likely to be minimal. Should water be required, potential sources would be satisfied by the catchment farm dams or water carts.

Erosion and Sedimentation

A number of submissions expressed concern regarding the potential impacts of the Project on water availability, quality, and access. Some examples of these concerns are listed below:

- *How will erosion be managed on aforementioned roads straight after construction?*
- *The EIS included an assessment of the potential impacts on the quantity and quality of surface water and groundwater within the Burrendong Water Catchment Area, however, there is no identification of where the potential detrimental water quality impacts will occur. This is of significant concern, as the Meroo river, and all other tributaries leading into Burrendong dam could be impacted through sedimentation and contamination. The EIS found that impacts will occur within the Burrendong Water Catchment Area, with the greatest impacts being erosion and sedimentation, water availability, and potential pollution on watercourses during construction. Pre and post development calculations (Table 6-98 of the EIS) show that there is a significant increase in the sediment runoff from the Project*

RESPONSE:

Whilst the majority of disturbance from the Project is in the very upper catchment (and that would provide additional buffer to any sediment that runs off after mitigation measures are applied), those areas close to, or in direct connection with, the key water areas (e.g. waterway crossings or work close to waterways or banks of Burrendong Dam or its major tributaries) may need additional monitoring or onsite targeted mitigation as part of the preparation and implementation of a Erosion and Sedimentation Management Plan. The Project will comply with Section 120 of the POEO Act which prohibits the pollution of any waterways. Should changes in sediment runoff be observed outside acceptable ranges, additional general mitigation options, as per the NSW Government Managing Urban Stormwater Soils and Construction guidelines (the “Blue Book”), will be investigated, including:

- Additional sediment fences
- Additional sediment basins
- Increased length of swale drains along the road sides
- Distributed discharges and reduced velocities of discharges to deposit sediment as close to the source (road and hard stands) as possible.

4.3.1.9. Waste

Multiple submissions were received regarding the creation and disposal of waste from the Project. Some examples of these concerns are listed below:

- *The blades are made from fibre/epoxy matrix composites and are extremely hard to break down THEY DONT. They are either deposited in landfill or incinerated in cement factories*
- *Where does all the waste go from the Project or will it just be another truck*
- *Where can all the toxic waste go?*

RESPONSE:

The majority of waste will be generated during construction of the Project. Minimal waste is expected to be generated during the 30 year operational life of the Project. The Proponent is working with DRC and MWRC to understand the requirement and any limitations of existing recycling and waste disposal facilities.

To minimise any potential waste impacts of the Project, appropriate and best-practice waste management principles will be implemented in accordance with the relevant legislation and guidelines, including:

- *Protection of the Environment Operations Act 1997 (POEO Act)*
- *Protection of the Environment Operations (Waste) Regulation 2014*
- *Waste Avoidance and Resource Recovery Act 2001 (WARR Act)*

- *Waste Classification Guidelines: Part 1 Classifying Waste 2014.*

A key component of implementing best practice waste management involves applying the resource management hierarchy principles outlined in the WARR Act in accordance the principles of Ecologically Sustainable Development (ESD) being the precautionary principle, inter-generational equity, conservation of biological diversity and ecological integrity, and improved valuation, pricing and incentive mechanisms (Randal Environmental Consulting 2012). These principles include:

- Avoidance of unnecessary resource consumption
- Resource recovery (including reuse, reprocessing, recycling and energy recovery)
- Disposal, including the management of all disposal options in the most environmentally responsible manner in accordance with the *Waste Avoidance and Resource Recovery Strategy 2014 – 2021* (EPA 2014).

For the Project, final waste management arrangements and strategies will generally rely on detailed designs, which will finalise the types and amounts of equipment and materials required to be disposed of. As part of the detailed design phase, and outlined in the EIS, the Proponent has committed to the preparation of a WMP to be prepared post approval which will include a detailed breakdown of waste types and quantities.

Information regarding specific waste management arrangements, such as the preferred waste recovery site, will not change the overall waste management outcomes outlined in the WMP. The development of the WMP will also involve consultation with all relevant waste disposal contractors/receivers available at the time of construction as well as Councils to keep them informed of the progress of the Project in relation to waste management. The WMP will outline the measures and strategies to be implemented on site to manage, reuse, recycle and safely dispose of waste, including:

- Separation and storage of recyclable and non-recyclable materials
- Reuse and collection/transportation/disposal of waste
- Procedures for tracking waste storage and disposal.

On-site waste management will also include the appropriate separation and storage of various waste streams to enable recycling and reuse wherever possible to reduce potential environmental impacts or impacts to the capacity of local waste management facilities. The Proponent will provide waste recycling and disposal bins on site in all construction areas for the construction phase and maintain bins around relevant areas of the Project site during operations, including within compound areas, to provide for appropriate waste separation, collection, storage and disposal.

Performance against the conditions and commitments outlined in the WMP will be subject to independent environmental audit throughout the construction, operational and decommissioning phases of the Project. This will provide confidence that the measures in the WMP are appropriately implemented, and any waste management issues are identified and rectified in an efficient manner.

EPOXY RESIN WASTE

Epoxy resin applications for wind turbine blades typically involve thermoset resins that embed glass or carbon fibres onto the turbine structures. Epoxy resin used in the construction of WTG blades form a small proportion of the overall material volume used. However, it is noted that traditionally, the most difficult part of a WTG blade to dispose of has been the fibre glass/epoxy/carbon fibre elements of a blade as they are hard to separate and breakdown. As the wind energy sector continues to grow and advance, innovations in WTG blade design continues to demonstrate a reduction in the waste associated with WTG blades, including harder to manage epoxy resin wastes. Manufacturers such as LM Wind Power and Vestas are ready to bring 'zero waste' WTGs to market by

2030, inclusive of novel methods to separate and break down the traditionally hard to dispose of epoxy resin used in WTG blades (LM Wind Power, 2024; Vestas, 2024; Gammelby, 2023).

A new chemistry process outlined in a paper by Ahrens et al. (2023) involves an application that can chemically break down the bonds created by the epoxy resin into base components and ultimately allow for the recycling of thermoset epoxy resins found on wind turbine blades. The industrial application of this process will considerably reduce the waste associated with WTG blades by allowing for the traditionally hardest part of the blade, being the epoxy resin, to be separated and recycled for future uses and avoiding disposal in landfill.

The claims of toxic WTGs are often based on the assumption that some components required to manufacture blades, such as BPA that is infused in the epoxy resin, have a large and ongoing impact on the environment. Retired WTG blades are increasingly being stored in anticipation of a 'circular economy' whereby the recycling of blades becomes widespread. This circularity is expected to occur alongside increasing recycling capacity for epoxy resins as discussed above. It is noted that the current landscape of waste management for wind turbine blades in Australia is not adequately adapted to separate and dispose of the epoxy resin. One method for disposal of hard to recycle blades containing the epoxy resin is to bury them underground in landfill sites.

4.3.1.10. Social

Ethos Urban undertook the SIA and Economic Impact Assessment as part of the EIS. They have provided a response to submissions that were considered of relevance to the SIA and EIA. The response to submissions by Ethos is provided below.

Loss of Farmland

The key concern was the reduction in the total area used for agriculture due to the Project, as shown in the below examples:

- *This transition has the potential to take thousands of hectares of land out of food and fibre production (killing small farming communities)*
- *The project is predominately located on privately owned agricultural land used for agricultural purposes. Where is all the food and fibre going to be grown to feed and clothe Australians when this is added to all the agricultural land being taken for renewable factories*
- *Arc Energy and Eco Logical say the area is predominantly agriculture. This is not the case; the area is predominantly passive recreation. If Arc were to list all of the hosting sites it would show that only a few are still being used for agriculture.*

RESPONSE:

The Project will have a very limited impact on existing agricultural activities within the Project Site. As discussed in the EIS (ELA 2023a), more than 95% of the Development Footprint will be located on land with low to very low agricultural capability that is not supportive of food and fibre production (being on land with LSC Class 6 and 7 soils). The land encompassing the Project Site is largely used for historic grazing and recreational purposes. Therefore, the Project will not likely have a detrimental or considerable impact on productive farmland and agricultural production given its existing limitations. It is noted in the EIS that existing land uses such as sheep grazing will continue with minimal interruption from the Project given the location of Project infrastructure and WTGs are largely located along elevated ridgelines and areas that provide little agricultural benefit.

The benefit of renewable energy projects generally is the increasing ability for projects to 'co-locate' infrastructure that allows for the continued agricultural uses in many instances. Additionally, highly productive agricultural land, especially BSAL is avoided wherever possible to minimise the reduction of land used for agricultural production in Australia.

Change in Community Composition and Cohesion and Loss of Rural Character

The key concern was the sense of change to rural community composition. This was articulated as an impact on community character and sense of distinct regional/rural identity, as shown in the below examples:

- *Ark Energy need to do better and find a location closer to the cities. We need to protect our landscapes because that is what makes rural NSW unique and a desirable place to live.*
- *projects like this are no good for rural communities in NSW. Keep them out and put them closer to the cities. protect our landscapes, wildlife, and lifestyles!*
- *do not put these ugly fixtures on our rural landscapes. put them closer to the city. i object to this project*

The key concern was the qualitative change in the rural environment caused by the development. This can be experienced by residents and visitors as a sense of loss due to their sense of place and/or general appreciation of the landscape, as shown in the below examples:

- Beautiful farmland is being destroyed by these toxic projects with no regard to the lasting damage they will do when they no longer work.
- I object to this project because it will be an ugly addition to the rural landscape.
- I cannot express strongly enough my objections to the destruction of our homes and lifestyles by these monstrosities, which have been proven time and again to be a monumental waste and a complete failure

RESPONSE:

NSW government policy supports the urgent need to transition our economy to net zero and includes incentives to locate renewable energy projects in identified REZs. Whilst there are impacts associated with renewable energy projects, they also provide economic benefits to these regional areas. The perceived impacts on community composition have multiple elements, including the increase in non-local workers and families that may not share the rural identity of community members. The preparation of the Construction Workers Accommodation Strategy will provide mitigation measures that address the anticipated workforce impacts on the composition of local communities across nearby centres, including Mudgee, Dubbo and Gulgong. The SIA provided mitigation measures that also address potential impacts. The Proponent notes that residual impacts to community composition and character to have the potential to occur. This is amplified by the cumulative renewable energy developments occurring across the CWO REZ which will result in additional workers required in the region for their construction.

As identified in the SIA, there is the potential for the Project to cause elements of community conflict as a result of opposing views regarding the development of renewable energy generally and within the context of the Project location. Compounding this impact on community cohesion is the large number of renewable energy projects currently in the planning and / or development phase in the area and the associated concerns relating to distributive in equity of the negative and positive impacts of those projects.

A key consideration of the SIA process is the social impact management planning component as it ensures that the impacts identified throughout the SIA process and through community consultation activities, are managed effectively across the life cycle of the development (Franks & Vanclay 2013). The Proponent has outlined its commitment to several mitigation and management measures to address social impacts. The selection of social impact management strategies has considered multiple strategies proposed by the community, industry benchmarking, technical social advice and strategies proposed within the environmental technical studies. To mitigate the negative impacts of the Project, the SIA identified measures to reduce their significance, such as a social impact monitoring plan, communications and engagement strategy and workforce management plan, with positive impacts enhanced if the appropriate measures are implemented.

4.3.1.11. Economic

Ethos Urban undertook the Economic Impact Assessment as part of the EIS. They have provided a response to submissions that were considered of relevance to the EIA. The response to submissions by Ethos is provided below.

Tourism and the Local Economy

The key concern was that the non-local workforce may impact on the availability of accommodation for tourists across the region, as shown in the below examples:

- *These structures will destroy the landscapes in such a way that they will have negative impacts on tourism and therefore impact local economies*
- *It will also impact local economy in a negative way. As someone who works in a small rural supplies store, renewable energy developments such as these will ultimately close down businesses. protect rural NSW communities!*

RESPONSE:

The EIA and SIA both addressed potential impacts to tourism as a result of non-local workforce in Section 4.5 of the EIA and Section 7.4.3 of the SIA. Ethos Urban acknowledges that a potential reduction in tourism due to a change in landscape amenity is highlighted as an almost certain outcome. Recent research published in the Journal Tourism Geographies, after finalisation the SIA, identified how changes in conceptualisations of rural environments as tensions between landscape preservation and the renewable energy transition are negotiated in Sweden. The study's findings showed that, rather a than reducing tourism, wind farms force tourist to rethink rural landscapes, often attract different kinds of tourists who may not be as concerned with 'idyllic' environments (Prince et al. 2023). Mitigation measures were provided to reduce any potential impacts. The EIA recommended that a CWAS for the Project be prepared in consultation with relevant stakeholders prior to construction commencing. The CWAS proposed to:

- Contain measures to ensure there is sufficient accommodation for the construction workforce; and
- Ensure cumulative impacts from other SSD projects in the region are addressed, including the potential for the tourism sector to be impacts.

As a result, the Proponent has committed to develop a worker accommodation area within land owned by an associated landowner. This will reduce the impact of the non-local workforce who will be able to access accommodation without putting pressure on limit accommodation options within local townships and communities.

Furthermore, the Proponent has committed to participate in the Australian Industry Participation process for major projects under the *Australian Jobs Act 2013* to ensure full, fair and reasonable opportunity for local companies to compete for work in the Project. During the pre-construction and procurement phases, the Proponent will invite (via project newsletters and the project website) interested suppliers of goods and services to register their interest in participating in the Project. This will help ensure that local businesses are able to benefit from the works associated with the Project, both directly through workforce and supply and the wider benefits of economic stimulus on local communities. Similarly, the operation and maintenance staff for the Project will be locally employed and trained to work on the specific wind turbines selected for the Project, helping to keep the associated benefits of local work within the community, and not remotely.

The CWAS has been developed to minimise negative impacts on the local housing market, the commercial accommodation and short-term accommodation providers and to be dynamic and adaptive. Additionally, mitigation options, monitoring plans and engagement strategy has been considered within the CWAS.

Wage Disparity

The key concern was that wage disparity between non-local workers engaged in construction of the proposed wind farm and local workers may inflate prices of goods and services, impacting the cost of living for local residents with lower incomes, as shown in the below examples:

- *Employing 25% of the workforce from the local region is a pipe dream and will take local workers from farms and businesses creating more stress for landowners and local businesses*
- *As someone who works in a small rural supplies store, renewable energy developments such as these will ultimately close down businesses.*

RESPONSE:

The EIA found that the spending associated with non-local construction worker wages would represent an economic stimulus into the region as the ABS *Household Expenditure Survey* indicates that approximately 75% of post-tax wages are likely to be spend by workers in regional economies (ABS 2017), as shown in Section 4.6 of the EIA. Additionally, the CWAS will outline mitigation measures to ensure the balance of local/non-local workers is both realistic and appropriate and would not prejudice existing services to the local community (i.e. local retailing). Additionally, the Proponent has committed to sourcing local materials wherever possible noting the cumulative impact of other large scale projects in the region. It is expected that the increase of workers in the area, supported by onsite accommodation will be able to inject further stimulus into the local economies as well as the Project itself sourcing various materials from local suppliers.

Workforce Accommodation

The key concern was that an increase in the non-local workforce will reduce rental housing availability, as shown in the below examples:

- *Ark Energy have stated that there will be a peak workforce of 375, there is no provision for the accommodation of said workforce, as there is very little vacancies in the rental market in the local area.*
- *The EIS lacks a lot of details such as housing for workers*
- *At the information session held by Ark Energy on the 8th December 2023 I asked questions around the peak workforce and the workers accommodation strategy. Not one of the four Ark Energy employees in the room could supply the peak workforce figure off the top of their head and I was told it is not yet known where the workforce will be housed.*

RESPONSE:

The Project now includes a TWAF within the Project Site. An assessment of the TWAF is provided in Appendix A.2 of the Amendment Report (Barnson 2025; ELA 2026a).

4.3.1.12. Air Quality and Dust

A submission was received regarding the impact of dust generation on air quality as a result of construction works. The submission felt that:

- *Air quality impacts from the increase in dust within the environment has been underestimated. It is unacceptable to have daily dust limits exceeded. The excavations required for the turbine footings, access tracks, stockpiles, and load hauling, in friable soils will increase the generation of dust particles. Mitigation measures proposed are not adequate to reduce this impact*
- *...the air is unpolluted, and the bore water is clean... We would now need to sell the property with the proposed wind turbine development as this will bring a lot of pollution to the land*

RESPONSE:

The Proponent will take all reasonable steps to minimise off-site dust, fumes and blast emissions from the Project and minimise surface disturbance on the Project Site. Wind farm developments require a licence from the EPA which regulate any discharge to the air and water. The generation of dust and associated potential impacts on air quality are expected to be minor, short-term and predominately associated with the construction phase as construction activities will require the use of plant, removal of soil and the movement of vehicles. These emissions would be temporary in nature and associated with the specific locations of construction works at a given time. The works are proposed to occur progressively across the Project site, which each area being rehabilitated as soon as practicable following construction. This will be subject to seasonal and land use considerations. The construction activities that may generate dust will be localised and small at any given point in the context of the overall Project Site. As such, the predicted impacts are not anticipated to result in material air quality impacts.

Construction activities would be subject to a range of air quality management and mitigation measures through the implementation of a CEMP. A Rehabilitation and Decommissioning Management Plan would also be prepared to provide detailed management measures to guide the rehabilitation process and reduce impacts, including those associated with air quality as a result of construction works. The CEMP will include specific measures to address air quality impacts, including:

- Minimise the area exposed by construction at any one time by minimising clearing and ground disturbance to the minimum necessary and progressively rehabilitating disturbed areas as construction is completed in each area
- Minimise dust emissions from areas exposed by construction through the application of water and/or dust suppressants using a water cart (as required)
- Locate, shape and seed longer-term topsoil stockpiles in a strategic manner to minimise dust erosion from exposed surfaces
- Implement and enforce speed limits for construction vehicles and equipment on unsealed access tracks and hardstand areas
- Limit construction activities during unfavourable (windy) weather conditions
- Dust controls (such as water sprays or dust capture systems) for the construction phase concrete batching plants
- Dust controls (such as water sprays or dust capture systems) for the construction phase crushing and screening plants regular inspections/audits to ensure appropriate air quality controls are being implemented during construction activities.

Based on the implementation of the above mitigation measures, combined with the temporary nature of the works involved, air quality impacts are not predicted to occur that would have adverse effects on agricultural or recreational activities within the Project Site.

4.3.1.13. Biosecurity

A number of submissions expressed concern regarding biosecurity concerns relating to the spread of weeds, pests, and disease. Some examples of these concerns are listed below:

- *Biosecurity is another risk. Vehicles driving from property to property will spread weeds, diseases etc. How will this be policed?*
- *How will Ark Energy ensure that no weeds or animal diseases are spread from property to property? How will any procedures undertaken be policed during construction?*
- *With the construction they have identified that there will be an increase in predatory species, increase in pest animals and increase in fire risk. They do not state on how this is to be controlled. So more predatory species and pests.*

RESPONSE:

The Proponent is committed to the avoidance and minimisation of potential biosecurity impacts that may occur, primarily during the construction phase. The Proponent will implement biosecurity controls for the Project during the pre-construction phase and extend throughout the construction, operation and decommissioning phases. This includes implementing controls that focus on appropriately managing pests, weeds and overall biosecurity as part of delivering the Project. As outlined in the EIS, the construction phase is anticipated to pose the greatest risk of biosecurity impacts through the potential introduction of weeds via construction vehicles. The Proponent is committed to maintaining a positive and beneficial relationship with neighbouring properties and will respond to any weed, pest or other biosecurity risks and/or issues that may arise and will maintain communication with neighbours regarding issues and/or risks they may identify.

The spread of weeds due to vehicle movements has been addressed in the EIS and specific management procedures will be implemented as part of the Environmental Management Strategy which will be approved by the Planning Secretary. The management procedures will outline measures to reduce the transport of weeds from vehicle movements, including vehicle and footwear hygiene practices and in accordance with measures proposed in both the Central Tablelands Regional Strategic Weed Management Plan 2023-2027 and the Central West Regional Strategic Weed Management Plan 2023-2027. These management controls will involve the following measures:

- Weed management, including that all machinery and equipment be cleaned thoroughly prior to entering the Development Footprint. Cleaning will include the removal of all mud and plant matter, followed by washing with high pressure water to remove potential weed species
- Fencing and access control, including:
 - During construction, the approved construction footprint will be clearly demarcated and identified during the construction stage with survey pegs and flagging, bunting or similar at certain locations to avoid accidental damage to areas outside of the Development Footprint
 - Access control to protect and demarcate areas outside the Development Footprint from vehicle access, human access, and accidental disturbance
- The preparation of the Decommissioning and Rehabilitation Management Plan which provides measures to undertake routine weed management of areas that have undergone temporary construction impacts and following the decommissioning of Project infrastructure after 30 years. The plan would require routine surveys of rehabilitation areas and the undertaking of routine weed management measures when the abundance of weed species reaches a specified threshold over a designated area.

Multiple management plans will contain relevant provisions for regular inspection relating to weeds and pests and for the implementation of controls as necessary.

4.3.1.14. Health - EMF

A number of submissions expressed concern regarding the potential for the Project to generate health impacts as a result of Electric and Magnetic Fields (EMFs). Some examples of these concerns are listed below:

- *We love being connected to nature & especially love the fact that our phones don't work there (safe from the wrath of EMF). (...) How could we even sleep with towering turbines along with the constant lights, vibrations & EMF. It would be too dangerous to be here full stop!*
- *These structures will have a number of ill-health effects on the local residents. They will have to deal with (...) EMR.*
- *I am further concerned with the effects of the pollution and radiation from their functioning including if required to use fuel to run them.*
- *Electromagnetic Fields (EMF) may disrupt animals biological functions, sleep and reproductive cycles. The POWER Over Headlines: Various studies have been done on the health risk that low-frequency magnetic fields could be carcinogenic or cause cancer. I am convinced that it does - therefore I would oppose these large overhead power lines being near or on my property. Do the Wind Field Developers have such a report - 2023? I have read humans RF (Radio Frequency) and EMF can cause neurological cognitive disorders.*
- *the absence of phone reception and electromagnetic fields (EMF) has been a deliberate and cherished aspect of local residents, who have made a choice for this off-grid lifestyle. The introduction of turbines will disrupt this EMF-free environment.*
- *The whole purpose of purchasing this land was to take our little boy... there who has a severe brain injury. He is very sensitive to EMF submissions, Wi-Fi and also electromagnetic smog. When we go camping there [our son] has reduced seizure activity and becomes very calm and has less painful spasms.*

RESPONSE:

The Proponent will ensure that the design, construction and operation of the Project complies with the applicable electrical magnetic field limits in the ICNIRP Guidelines as outlined within Section 6.7 of the EIS. Electric and magnetic fields (EMFs) occur wherever electricity is produced, transmitted or used, from every day electronic devices such as smart phones and refrigerators to WTGs and transmission cables used to transport electricity. As noted by Ahlbom et al. (2001), humans are continuously exposed to time-varying low-frequency EMFs from both natural sources (i.e. solar activity, earth and human body magnetic fields, etc.) and radio/tv transmission devices, electrical power lines and electrical appliances. A key component of the concerns regarding EMFs is the impact on human health such as cancer, sleep loss and reproductive impacts.

McCallum et al. (2014) undertook a study to characterise EMF exposure at three exposure levels, being high wind, low wind and shut off (where the turbines were not in operation). Background EMF levels were established by measuring the magnetic fields strength (mG) around WTGs under the 'shut off' scenario and found to be 0.2 to 0.3 mG. The magnetic field levels detected at the base of the WTGs under both high and low wind scenarios were low (mean = 0.9 mG) and were found to rapidly diminish with distance. The study found the magnetic strength to become almost indistinguishable from background levels within 2 m of the WTG base. Furthermore, the magnetic field measured 1 m above buried collector lines were also within background levels, with none of the measured infrastructure affecting EMG levels at nearby homes located just over 500 m from a WTG. The intensity of EMFs at the base of WTGs in both high and low wind conditions was also found by Aris et al. (2020) to rapidly decrease with an increase in distance and reaching background values at a distance of 6 m from the base of the WTG.

Given the lack of non-associated dwellings within proximity of a WTG, EMFs caused by WTGs are not expected to have any effect on stakeholders within the or in proximity to the Project Site. This is further supported by a literature review which found no studies identified "effects on human health of 'infrasound and low-frequency

noise' or 'electromagnetic radiation'" were produced by wind turbines (Merlin et al. 2015). It is noted that the exposure levels associated with WTGs and associated infrastructure are far lower than the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines for the general public as well as the level set by the International Agency for Research on Cancer (IARC) to classify EMF as a Class 2B possible human carcinogen.

The Proponent has not commissioned an Electromagnetic Field Assessment as a part of the EIS or submissions report. However, other wind farm projects proposed in NSW have undertaken similar assessments. The assessment conducted for the Spicers Creek Wind Farm was prepared using a 'worst case scenario' being the highest voltage scenario in which a person would be directly beneath a 330 kV overhead transmission line. With conductors at a minimum height of 11 m above the ground, the assessment found that EMF strength was below the public exposure limits and noted that the public would generally not be adjacent to electrical infrastructure thereby further lowering any risk of EMF impacts (Umwelt 2023).

4.3.1.15. Health

A number of submissions expressed concern regarding the perceived effects of wind farm developments on human health, including the impacts of infrasound and electro-magnetic fields. Some examples of these concerns are listed below:

- *It would destroy not only the environment & wildlife but our health. How could we even sleep with towering turbines along with the constant lights, vibrations and EMF*
- *It is unreasonable that local residents are expected to live so close to these wind turbine farms. These structures will have a number of ill-health effects on the local residents. They will have to deal with flicker, ultrasonic sounds, whooshing, EMR*
- *I fear for the residents in having to live close to these unsafe wind turbines. The impacts these will have on their health will be significant.*

RESPONSE:

The National Health and Medical Research Council (NHMRC) has concluded that there is no consistent evidence that wind farms cause adverse health effect in humans (NHMRC 2015). The SIA acknowledges that impacts to health and wellbeing can manifest both mentally and physically, as well as psychological stress as a result of uncertainty, financial stress and/or other pressures as a result of the Project. Changes to individual and public health are also noted as concerns held by community members as a result of 'flicker, ultrasonic sounds, whooshing, EMF, constant lights and vibrations'. The Proponent seeks to avoid these potential impacts wherever possible and has undertaken a number of measures to achieve this.

It is noted that only four (4) non-involved dwellings are located within 3,350 m of a WTG, considered the Black Line of visual impact. Of those dwellings, the two closest dwellings are approximately 1,500 m from the nearest WTG. Based on the proximity of dwellings to the Project, the potential health issues raised during submissions are unlikely to occur given the relative distance in which these impacts occur. This includes perceived impacts to sleep as a result of infrasound negatively impacting sleep. A study by Marshall et al. (2023) found that none of the participants who were involved in a sleep study exposed to infrasound were impacted. The study mirrors similar work that has found no connection between WTG infrasound with impacts to sleep. Impacts to sleep are further minimised given the limited number of people in proximity to WTGs that may be impacted.

As discussed in Section 4.3.1.2, Section 4.3.1.14, Section 4.3.1.16 and Section 4.3.1.17, the worst case potential health impacts related to noise, shadow flicker, light, EMF, etc. comply with the applicable government standards. The Project is not anticipated to have significant health impacts to either involved or non-involved dwellings, or the general public more broadly.

A number of submissions expressed concern regarding the health impacts of the Project on air quality and pollution. Some examples of these concerns are listed below:

- *Wind turbines cause pollution - directly through releasing chemicals that coat the blades slowly but surely, into the air, and then the soil and water.*
- *BPA covered turbine blades – Bisphenol A is a highly toxic compound used in epoxy resins of turbine blades. The leading edges of turbine blades shed fine dust*
- *Wind turbine blades leave a toxic waste legacy for centuries to come*

RESPONSE:

The Proponent acknowledges a number of submissions that raised concerns regarding the use of Bisphenol A (BPA) in the epoxy resin that binds wind turbine blade components together. BPA is a common industrial chemical that has been used to make certain plastics and resins for decades and is still used in containers that store food and beverages, including water bottles and other goods. However, there is no evidence to suggest that BPA can cause human health effects. The Proponent understands community concerns related to the potential impacts of BPA released from WTG blades and will utilise industry best practice and materials to reduce the potential for BPA exposure.

Concerns regarding the release of BPA from turbine blades are often based on the assumption that wind turbines release significant levels of BPA into the environment that ultimately enter waterways and the human body. Sources for this perception include a 2021 study by The Turbine Group (TTG) who released a self-published, non-peer reviewed report claiming that wind turbine blades release dangerous amounts of microplastics and BPA. A fact sheet published by American Clean Power (ACP) provides clarification on a number of assertions it considers to be misinformation. The fact sheet clarifies that during the epoxy resin coating process, BPA is used as an ingredient, which once the resin has hardened in the factory, prior to delivery to the Project Site, the blades only contain microscopic traces of residual BPA. From that point onwards, should trace amounts be released into the natural environment, they would rapidly undergo biodegradation and therefore be removed from the environment. The extremely low potential for BPA emissions from turbine blades is not considered to pose a risk to the environment or people and is much lower compared to what the US Food and Drug Administration has approved for human exposure from commonly used food and beverage packaging (ACP 2023).

Continual advancements in the industry are resulting in multiple novel approaches to increasing the protection of turbine blades and reducing leading edge erosion. They include new coating materials and methods, shielding materials and reinforced structures all with the purpose of reducing leading edge erosion and thereby lowering the potential for microscopic levels of BPA being released (Mishnaevsky et al. 2023). Additionally, advances in recycling and decommissioning of wind turbine blades has led to novel approaches which allow for the breaking down of epoxy resins and separating them from intact carbon fibres. This has traditionally been the key stumbling block in fully recyclable wind turbines. By developing and implementing a process to fully recycle wind turbine blades, the potential for BPA release into the environment at the end of life stage is significantly reduced as what BPA may remain in the original blade can be extracted and recycled into new blades. Therefore, the Proponent accepts stakeholder concerns about BPA but has determined that there is not a significant risk of BPA release posed by the development of the Project.

4.3.1.16. Light

A number of submissions expressed concern regarding the potential impacts of lighting from WTGs on stakeholders and the local environment. Some examples of these concerns are listed below:

- *The fact that they are so large to require night lighting, for safety concerns, illustrates they will be a mammoth blight on the ridgeline*

- *The flashing lights of the turbines will also impact the people living in this area*
- *As an avid astronomer, the installation of the wind turbines will destroy the dark skies that I rely upon due to the permanent lighting on all turbine masts. This means that astronomical imaging will not be possible at the very least, to the South any longer*
- *We asked several times if there were to be lights on the blades/turbines. Their response was they didn't believe so. Now I see on the report that there is lights. Again – an example of withholding information*
- *It would destroy not only the environment & wildlife but our health. How could we even sleep with towering turbines along with the constant lights.*

RESPONSE:

At the time the LVIA was prepared, it was understood AHL was not a requirement (as per the AIA prepared by Aviation Projects 2023) and therefore was communicated as such. However, CASA reviewed the Project during the exhibition phase and have recommended AHL is installed on WTGs (Section 4.1.2).

Table 4-17 taken from the *CASA ADVISORY CIRCULAR AC 139.E-05 v1.1: Obstacles (including wind farms) outside the vicinity of a CASA certified aerodrome (October 2022)* indicates that a 2,000 candela light is visible at 4,900 m from the source. A 200 candela light would be visible from an even lower distance.

An AHL plan has been prepared by Aviation Projects. Figure 4-17 illustrates 39 of the proposed WTGs identified to be lit with AHL at the hub.

Table 4-17: Light visible distances (CASA 2022)

Time Period	Meteorological Visibility (m)	Distance (m)	Intensity (Candelas)
Night	4,800	4,700	1,500 (+/- 25%)
		4,900	2,000 (+/- 25%) (ICAO medium intensity light)
		2,200	32

As per MLA addendum report, considering the distance of 4,900 m as a worst-case scenario for AHL visibility, it is noted there are limited opportunities to view WTGs with AHL from publicly accessible land (Appendix D of the Amendment Report (Moir Studio 2026; ELA 2026a)). Considering the reduction of lighting strength to 200 candela, existing topography and vegetation, it is determined that the visual impact resulting from AHL is negligible.

In regard to the potential visual impact on nearby dwellings, the Visual Assessment Bulletin states that the proponent must “*Shield all AHL within two kilometres from any dwellings. Avoid strobe lighting.*” There are no dwellings within two kilometres of a WTG. The nearest dwelling with visibility of a WTG hub is dwelling T7-2, located 3.25 km from the nearest WTG and therefore the AHL presents limited opportunities for visual impacts on surrounding dwellings given the use of lighting strength of 200 candelas (Refer to Appendix D of the Amendment Report (Moir Studio 2026; ELA 2026a)). It is unlikely that there would be any ill effects on the health of community members as there are no dwellings within 2 km of a WTG containing an AHL.

Night Lighting

A number of submissions outlined the importance of the visual amenity of the area, including the value of the lack of light sources in the landscape during the night. There is apprehension that the Project would introduce unwanted light sources into the dark landscape and ‘ruin’ the area from a light spill perspective. Alternatively, both the CASA and the DoD require the introduction of light sources on certain infrastructure to assist in night time operation of aircraft. A number of measures have been proposed to accommodate for the concerns and requirements of both the community members desire for a ‘dark sky’ landscape and authorities such as CASA and DoD. These include measures to reduce the impacts of night lighting on stakeholders viewing the Project from the

ground while providing appropriate lighting for aircraft through the use of downward shielding and a reduction in the candela (brightness) of lights to 200Cd. Additionally, 39 of the 70 WTGs are proposed to be lit, reducing the potential light impacts at night in half. These lights will be illuminated with red lights which will reduce the impacts of light spill in the environment.

Concerns regarding light within the environment is based on the perception that the introduction of light in the environment will negatively impact the visual amenity of the area as well as potentially impact local fauna species. In order to avoid and mitigate the impacts of lighting on stakeholders in the environment, the Project will use red lights in accordance with the *Civil Aviation Safety Authority, Part 139 (Aerodromes) Manual of Standards 2019*. The use of red light has been shown to limit the impact of light pollution for a number of reasons. Principally, light with longer waveforms (which humans perceive as generally red) scatter less in the atmosphere which in turn reduces 'skyglow', or the brightness of the night sky as a result of light pollution. On top of the lower visual intensity of red light generally, the impact on human night vision is also reduced as red light at night has been shown to preserve visual capabilities in low-light, ultimately meaning the general amenity of the dark sky will not be significantly impacted (Durmus et al. 2024). With regard to impacts to biodiversity, Durmus et al. (2024) note that prey species are not spectrally sensitive to higher wavelength light, which in turn predators are not incentivised to forage around red light sources lowering the potential for night time collisions. Therefore, the impacts of night lighting of certain project elements are expected to have limited potential impacts while facilitating the appropriate safety measures to support night time aerial operations.

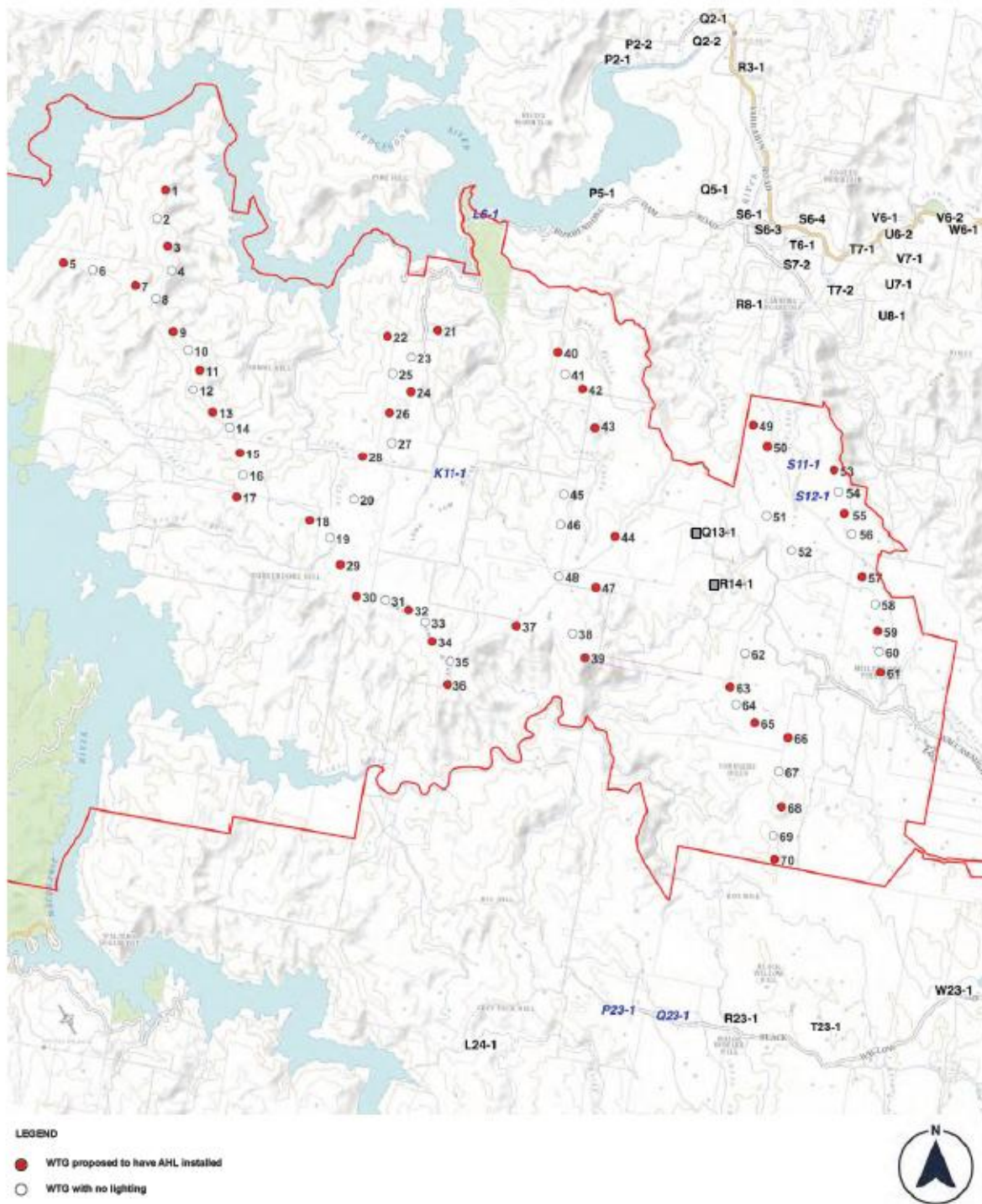


Figure 4-17: WTGs with Aviation Hazard Lighting proposed at hub height (Moir Studio 2026)

4.3.1.17. Shadow Flicker

A number of submissions expressed concern regarding the potential for shadow flicker to occur and its impacts. Some examples of these concerns are listed below:

- *Also the shadows from the blades flickering when in the sun while rotating may cause behavioural changes and agitation*
- *The acceptable level of shadow flicker is said to be 30 hours per year. How would any of the DPE or Ark Energy staff feel if their residence was subjected to that number of hours of shadow flicker? What about residents who may have epilepsy or chronic migraines? It is not acceptable that anyone should have to endure this burden for any amount of time*
- *They [Ark Energy] talk about shadow flicker not being a problem for the non-associated dwellings. This statement is flawed as they have not included at least 50% of the non-associated dwellings*

RESPONSE:

Shadow flicker occurs when the blade of a WTG creates a moving shadow in the landscape as the blade passes in front of the sun. The effect occurs under certain circumstances where, during certain periods of the day, the sun's rays pass through the swept path of a WTG blade and cast a shadow within the landscape. This occurrence can potentially affect the viewpoint; however, the impact of shadow flicker is diminished by the distance of the viewpoint from the WTG as the intensity of the shadow is reduced. Shadow flicker is also influenced by cloud cover and the angle of the sun relative to the WTG blade (EPHC 2010). In accordance with the Visual Bulletin (DPE 2016b), shadow flicker should be limited to 30 hours per year.

It is acknowledged that shadow flicker caused by the blades may cause annoyance to those who experience the effect. It is noted that the Shadow Flicker Assessment undertaken as part of the EIS identified two (2) dwellings that have the potential to experience shadow flicker, R23-1 and Q13-1. Both dwellings were assessed as likely to experience less than the maximum of 30 hours of exposure per year in accordance with the Visual Bulletin, with between 17 to 26 hours expected, noting Q13-1 is now an associated dwelling. The Queensland Wind Farm Planning Guidelines note that the impact of shadow flicker is typically only significant up to a distance of 10 rotor diameters from a turbine, roughly 800 m to 1,500 m (based on rotor diameters of 80 m to 150 m). Beyond this distance, the shadow caused by the turbine is increasingly diffused in a way that continually reduces the impact of variations in light levels that may cause annoyance. As identified within the EIS, no non-involved dwellings are located within 1,500 m of a WTG. Therefore, the impact of shadow flicker on non-involved stakeholders is anticipated to be minimal and unlikely to cause repeated instances of shadow flicker.

With regard to non-associated dwellings not included in the EIS and associated studies, the assessments considered dwellings that had development applications lodged with either DRC or MWRC. Therefore, dwellings that did not meet the criteria of a dwelling were not included in the assessment. The data for what was considered a dwelling based on this criteria was provided by each Council to help inform the relevant assessments.

4.3.1.18. Property Values

A number of submissions expressed concern regarding the potential for the Project to negatively affect the value of their properties or properties within the local area in general, with a number of submissions referencing specific locations/dwellings. Some examples of these concerns are listed below:

- *Property value will take a massive nosedive and be worth next to nothing due to the carnage of the landscape*
- *As my property in Yarrabin was purchased for its visual amenity, if the wind farm is installed on the Worlds End range, a decrease in value of approximately 30% - 50% is assumed*
- *I am concerned about decreased value of my property*

RESPONSE:

The Land and Environment Court has ruled on several occasions that the assessment of impacts of a project on an individual property is not generally a relevant consideration under the EP&A Act unless the project would have significant and widespread economic impacts on the locality.

The determination of rural property value is based on a number of factors and is not easily determined. Some factors include the property market conditions, the productivity of the land, access, location, land size and soil type, according to the NSW Valuer General (Valuer General 2016). A key contributor to property value in rural settings is the agricultural productivity of the land. In this regard, the Project is proposed across largely unproductive land or land that is better suited to grazing.

The SIA prepared as part of the EIS addressed the potential for wellbeing impacts flowing from an anticipated decrease in property values associated with the Project and wind farms generally. The NSW Valuer General commissioned a study across eight wind farms in both NSW and Victoria with the aim of assessing the impacts of wind farms on surrounding land values through the analysis of property sales transaction data. The study found that wind farms did not negatively affect property prices in most cases. The study did note however that the sample size was limited. A study conducted by Urbis in 2016 indicated that wind farms may not significantly impact the value of rural properties used for agricultural purposes as there is no direct impact to the productivity of the land (Urbis, 2016). This is supported by a landmark study in the United States that found any negative impacts that did occur as a result of wind farms on property prices, were restricted to homes within 1 mile (or 1.6 km) of a commercial wind turbine. The study also found that the impact to prices was limited to 3 to 5 years (Brunner et al. 2024) noting that:

“on average, homes located within 1 mile of a commercial wind turbine experience approximately an 11% decline in value following the announcement of a new commercial wind energy project. Study estimates also reveal important dynamics in the evolution of home values, with property values first declining following project announcement, with property value impacts becoming relatively small (~ 2%) and statistically insignificant 9 years or more after project announcement”.

The study analysed 500,000 home sales within 8 km of US wind projects, looking at values before, during, and after project construction. Similarly, a study undertaken in 2014 in the UK conducted a review of over one million property sales across a number of countries over 18 years and found no evidence that property values were affected by the development of wind farms (RenewableUK 2014).

The Report on NSW Land Values, conducted by the NSW Valuer General (2023) found that in the 12 months prior to 1 July 2023, land values for the Central West NSW region increased by 14.9%. This increase follows on from a further 21.8% increase the previous year from 1 July 2022. This demonstrates a strong and sustained increase in property values within the Central West region. Both DRC and MWRC have seen consistent increases in land values over the last few years, across residential, rural and commercial market segments. The Project is proposed in an area that has seen a number of similar renewable energy projects approved and constructed, while at the same time the region has experienced a similar increase in overall property values, suggesting that the concerns raised about negative impacts to property values can be assuaged given considerable evidence to the contrary. These results reaffirm the SIA findings by demonstrating the temporary nature of property price impacts, with a statistically insignificant impact in the medium-to-long term.

4.3.1.19. Decommissioning

A number of submissions expressed concern regarding the decommissioning phase of the Project and how Project infrastructure is proposed to be disposed of. Some examples of these concerns are listed below:

- *This [EIS] does not state who will decommission the turbines. It is a general paragraph only. As far as we understand, it will be the farmers whose land on which the turbines sit who will have the job of decommissioning them*
- *Does the proposer have a plan to recycle the blade material or are they relying on filing the local council's tip.*

RESPONSE:

Decommissioning is an important aspect of the Project as it involves the removal of nearly all Project infrastructure and the return of the Project Site to its near prior condition in accordance with the SEARs. The WTGs have an expected operating life span of approximately 30 years, after which they may be decommissioned and appropriately disposed of. This will involve the removal of Project infrastructure, including WTG components such as the WTG blades, to be disposed of at various locations. Given the extended timeframe with which the WTGs will be decommissioned, the exact method or provider of waste services is not yet known. However, as stated in Appendix E of the EIS (Detailed Mitigation Measures), the Proponent will prepare a detailed Decommissioning and Rehabilitation Management Plan (DRMP) to facilitate the decommissioning process and provide methods to restore the capability of the Project Site to near-prior conditions. This will be developed in consultation with DPHI, DRC and MWRC to guide the implementation of decommissioning works.

At the end of the expected 30 year operational life span of the Project, three main options will be available to the Proponent, including:

- Continued use of the Project Site as a wind farm utilising the existing WTGs, and ancillary infrastructure (subject to the condition of Project infrastructure)
- Replacement of WTGs, and other necessary infrastructure with technology current to the time of repowering and the continued use of the Project Site for a further assumed 30 year period (subject to further development consent and landholder agreements)
- Decommissioning of the wind farm and associated infrastructure, including the removal of WTGs.

In response to the submission that understands the responsibility of decommissioning to fall to the farmers, the Proponent or subsequent Project owner will be solely responsible for the decommissioning and removal of all Project infrastructure from the Project Site and will not require farmers or landholders to dispose of Project components themselves. This requirement is in line with development consents with similar wind farm projects in NSW and is assumed to be required for the Project. The Proponent or subsequent Project owner, under agreements with host landholders, is contractually obliged to remove all Project infrastructure.

The decommissioning phase of the Project will see the Project Site returned to near prior condition, as well as efforts to rehabilitate the Project Site with locally appropriate vegetation in accordance with the conditions of consent and to the satisfaction of the Planning Secretary. The decommissioning process will include:

- Consultation of key stakeholders in the preparation of the DRMP
- Removal of all above ground infrastructure not previously agreed to remain intact, including WTGs, ancillary infrastructure and cabling
- Rehabilitation of groundcover to an agricultural capability were agreed upon with landholders
- Internal roads, where not required for ongoing farm use or fire access, to be removed. Similarly, access gates not required for farm use would be removed. Consultation with individual landholders will be undertaken to discuss the removal or hand-over of infrastructure on their property
- Where appropriate and previously agreed upon, some components may be left in-situ, such as WTG tower bases. These tower bases would be cut back below ground level (approximately 500 mm) to allow ploughing over or topsoil to be built up over the footings to achieve a similar result

- Underground cables (inert and stable) at a depth greater than 500 mm would be left in-situ to avoid unnecessary ground disturbance. All essential connection infrastructure will be retained.

The DRMP will include a review of the associated waste streams and recycling/disposal options available at the time. At the end of the operational life of the Project, all above ground infrastructure will be dismantled and removed from the Project Site and recycled in accordance with best practice at the time.

With regard to the recyclability of WTG blades, the EIS discusses the current landscape for recyclability and waste disposal, citing WTG manufacturer Siemens producing blades that are already 85% recyclable (Vorath 2021). Additionally, as discussed in the EIS, the CEC found that by mass, between 85 to 94% of WTGs are already recyclable and can be recycled in Australia (CEC 2023). Huge strides have already been made in the endeavour of producing fully recyclable wind turbines in order to further reduce the waste associated with wind farms. In 2022, LM Wind Power and GE Renewable Energy designed and built the world's largest thermoplastic wind turbine blade (Durakovic 2022) which addresses the critical challenge in recycling WTG components, being the separation of the resin from fibres used to create the blade. The manufacturing process and components mean that the traditionally difficult to recycle elements of the blade are now able to also be fully recycled. It is anticipated that 30 years of market development, as well as a range of other factors including government policy, will facilitate a waste management landscape in Australia that allows for recycling of a significant proportion of WTG components.

4.3.1.20. Cumulative Impacts

A number of submissions expressed concern regarding the potential cumulative impacts of multiple renewable energy projects within the Central West Orana Renewable Energy Zone. Some examples of these concerns are listed below:

- *Figure 25 of the EIS document is deceptive in showing all of the renewable projects and their impact area. By just including a symbol and not the impact area of each proposal it simplifies the impact and depicts the projects as widespread. However, when all the impact areas are overlayed, they are close together*
- *a number of projects (currently proposed and publicly known) are not listed in the EIS, which have the potential to increase the impact on the communities of Yarrabin, Worlds End, Hargraves Hill and Cudgegong River Valley. This includes the Phoenix pumped hydro and Paimbong wind farm. Who considers this cumulative impact of all the projects?*
- *Paimbong's turbines look set to be closer and more visible even than those of Burrendong. Was not Ark Energy obliged to consider the cumulative effect of this development before lodging their application?*

RESPONSE:

The Project is located within the CWO REZ which has been identified by the NSW Government for the development of renewable energy projects. The Proponent recognises that there are a number of renewable energy projects, including multiple wind farms proposed in the DRC and MWRC LGAs, in proximity to Burrendong Dam. The Proponent is committed to effectively managing and reducing its contribution to the cumulative impacts raised by the community, including on the visual amenity, traffic and biodiversity of the wider area. The Burrendong Wind Farm project has direct control only on the impacts of the Project and the measures it implements to address the identified impacts and have been key factors in the Project design from the outset. The cumulative impact assessment undertaken as part of the EIS provided appropriate management and mitigation measures and was undertaken in accordance with the *Cumulative Impact Assessment Guidelines for State Significant Projects* (DPIE 2022). Technical assessments also considered the cumulative impacts of multiple projects where potential impacts have the potential to occur, with the key findings summarised throughout the EIS.

A submission was received regarding the preparation of a figure showing renewable projects within a 100 km radius of the Project, it has been assumed this submission refers to Figure 2-5 of the EIS (ELA 2023a). The submission referenced a 'deceptive' practice of including a symbol to identify the projects rather than their total

footprints. It is noted that the figure was prepared at a scale intended to show the context of the Project in relation to the wider area, including the proposed CWO REZ. Additionally, a number of projects are in the planning and approval stages and do not have publicly available footprints that could be overlaid to show the proximity to different projects. It is not common industry practice for projects not associated with the proponent to provide project footprints that could be used to provide an indication of various projects in proximity to one another. The Proponent also recognises the broader cumulative impact assessment and mitigation measures being developed by the NSW Government including through EnergyCo and is committed to being involved in these initiatives wherever possible. It is noted that MWRC has commissioned a report identifying cumulative impacts and proposed mitigation measures to manage the impacts of renewable energy SSD projects across the LGA, prepared by PwC (MWRC 2024).

With regard to the Piambong Wind Farm and Phoenix Pumped Hydro Project, both of these projects were not considered at the time of the EIS as they were too early in the development phase to adequately assess cumulative impacts. It is noted that in accordance with the NSW *Cumulative Impact Assessment Guidelines for State Significant Projects* (DPIE 2022), these projects will be required to consider the cumulative impacts of the Burrendong Wind Farm in the preparation of their Environmental Impact Statements, helping to alleviate the concerns that projects are not being fully considerate of their cumulative impacts.

An updated renewable energy project figure has been prepared to include relevant projects that have been proposed since the submission of the EIS and is shown in Figure 4-18 below.

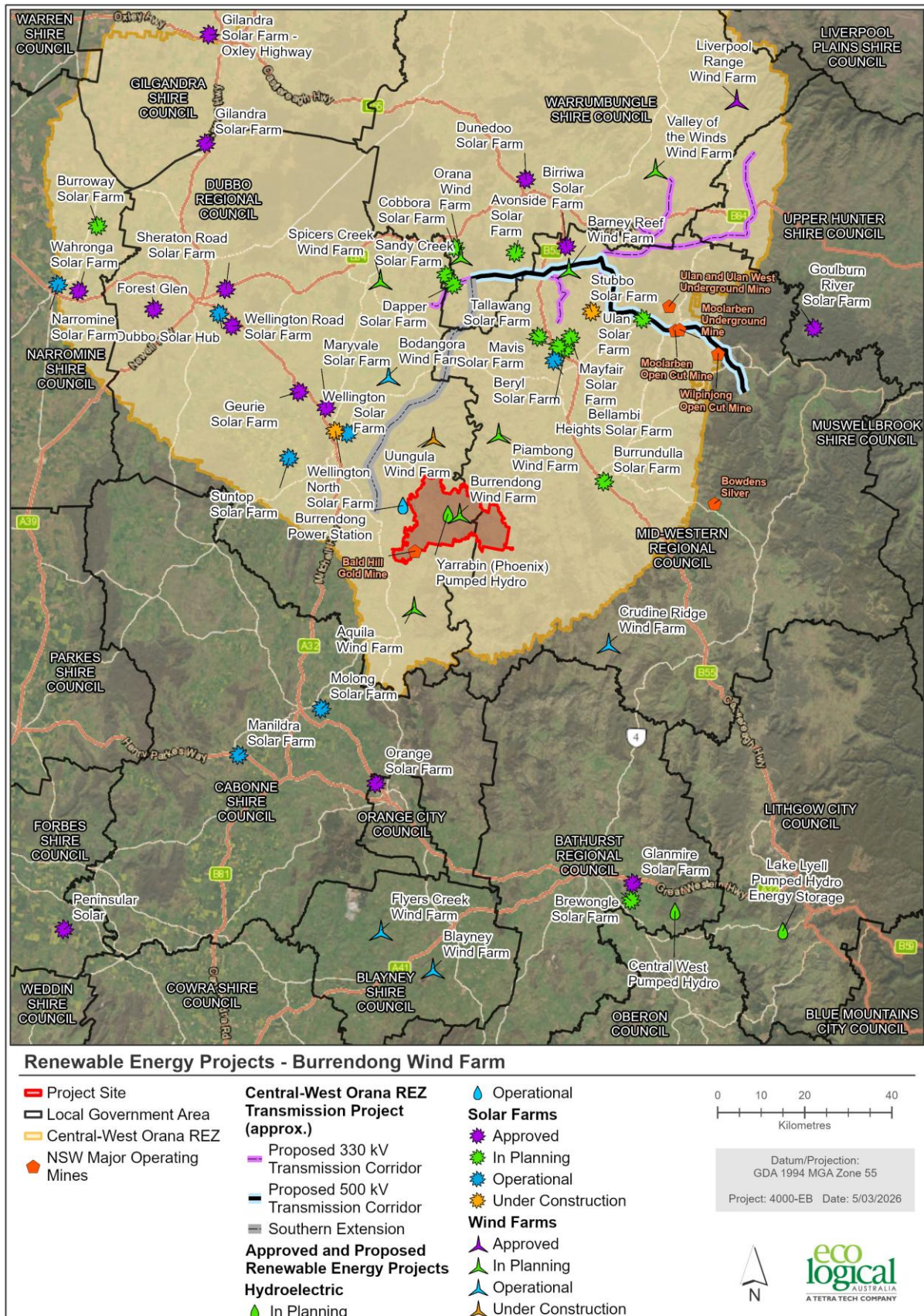


Figure 4-18: Updated renewable energy projects within proximity to the Project

4.3.2. Justification of the Project

4.3.2.1. Renewable Energy Generation

A number of submissions expressed concern regarding the usefulness of renewable energy to supply electricity to the grid, with some expressing a preference of fossil fuels. Some examples of these concerns are listed below:

- *It is essential that Australia prioritises reliable, affordable Australian power instead of this pathetic, insecure & outrageously costly, environmentally destructive - up to 70 x Wind Turbine plan.*
- *There are far better alternatives to fuelling electricity generation such as the existing coal powered system and nuclear.*
- *I object to this project. Do not destroy rural communities and landscapes for unreliable and unproven forms of energy.*
- *The project location is unsuitable given the amount of land clearing that will be required and the distance from the end user who resides in the metropolitan areas on the East Coast.*
- *Firstly, one of the key arguments in favour of wind farms is their capacity to reduce carbon emissions. Yes, wind turbines do generate electricity without directly emitting harmful greenhouse gases. However, the construction of wind farms requires extensive mining operations, manufacturing processes, and transportation, all of which contribute significantly to carbon emissions. The production and transportation of turbine components, such as steel and concrete, entail high levels of energy consumption and result in additional carbon emissions.*
- *How are these 'renewable energy' turbines manufactured? From mining and the use of fossil fuels of course. How is that environmentally friendly?*
- *I object to solar, wind and battery projects. In my opinion, they will do far more damage to the environment than coal, oil and gas ever did*

RESPONSE:

Need to Reduce GHG

The key driver of climate change today is the burning of fossil fuels and emission of large amounts of GHG, including for the generation of electricity. In 2020, 91% of global CO₂ emissions were sourced from fossil fuels and industry (Ritchie 2020). To stave off the worst impacts of a changing climate and maintain global heating to below 2°C, deep GHG emission reductions are required. One of the central components of reduction will be an energy transition away from fossil fuels to renewable energy. As seen in Figure 4-19 below, coal and gas produce significantly more emissions to produce a single kWh of electricity compared to renewable energy which nearly exclusively produces emissions during the manufacturing, construction and decommissioning phases.

A key difference between the emissions generated from renewables vs. fossil fuels is that the energy generated is emissions free, thereby limiting the overall emissions to a finite amount, while burning of coal and gas generates CO₂ emissions and therefore generates emissions for the life of the project. While the emissions intensity of a kWh of energy produced by wind varies between 5 – 26 g/kWh of CO₂e, the average black-coal-fired plants in Australia (the more efficient plants) have an estimated emissions intensity of approximately 900 g/kWh of CO₂e.

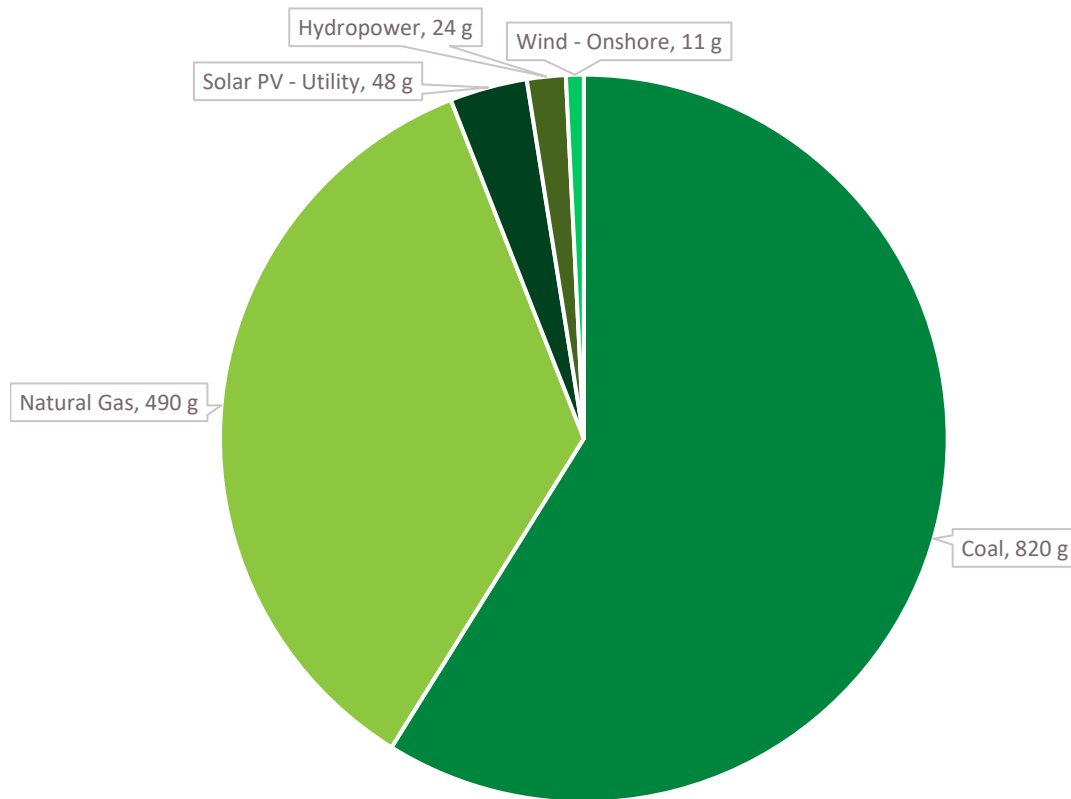


Figure 4-19: Average life-cycle grams of CO₂e emissions per kWh by generation source (WEA, 2022)

Levelised Cost of Energy

The Levelised Cost of Energy (LCOE) is the average cost at which energy generated through various forms (wind, solar, coal) is required to be sold to offset the total cost of energy production over the lifetime of the project (Oladokun & Asemota 2015). This helps understand the viability of energy projects and includes the capital, operating and maintenance costs of the Project; ‘cradle to grave’.

The global weighted average LCOE of wind energy generation fell 72% between 2009 and 2021, from USD \$0.311/kWh to USD \$0.035/kWh (International Renewable Energy Agency [IRENA] 2021; Lazard 2021). This trend continued in 2022, with the Renewable Power Generation Costs in 2022 report by IRENA (2022) showing the global average LCOE falling a further 5% between 2021 and 2022 to USD 0.033/kWh. As shown in Figure 4-20, onshore wind energy generation is the second cheapest form of energy per AUD/MWh and demonstrates that not only is this technology proven and reliable, it is also significantly more cost effective than traditional forms of energy generation.

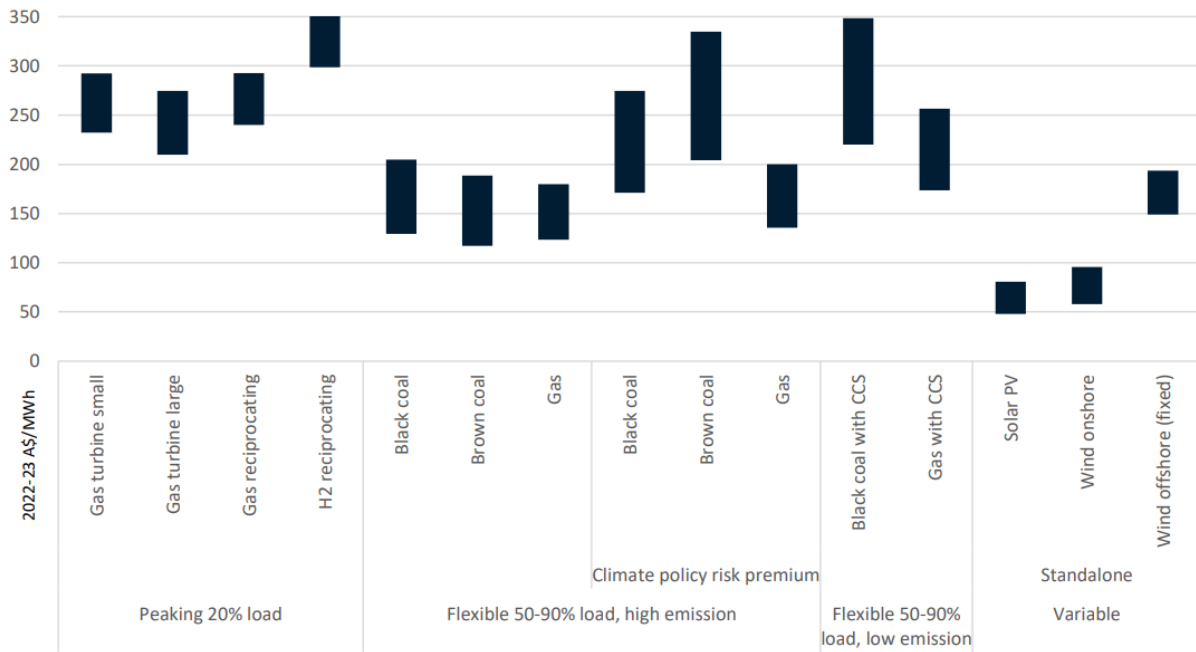


Figure 4-20: Calculated LCOE by technology and category for 2022 (CSIRO 2023).

Economic competitiveness of wind energy

Wind energy generation technology is now considered a mature technology. It is also one of the most cost effective and economically competitive forms of energy generation. The GenCost 2022 report prepared by the CSIRO (2022) reports that “renewable energy, led by wind and solar, have retained their position as Australia’s cheapest” form of new energy generation (CSIRO 2023). This is despite the fossil fuel industry in Australia being subsidised more than \$11 billion dollars in 2022-23 (Australia Institute 2023).

As discussed above, the LCOE of wind energy has dropped significantly in recent years, with the cost of wind farms falling by 55-60%, due primarily to reduced installation costs, increased turbine efficiency and capacity factors, etc. (IRENA 2021).

Emissions from Wind farms (mining, etc.)

To manufacture and construct wind farms, emissions are generated during the manufacturing and construction process. To understand how emissions intensive these activities are, a life cycle assessment can be undertaken by determining the emissions generated at each stage of existence, from manufacturing through to end-of-life disposal followed by an inventory of the energy and raw materials consumed at each stage (i.e. steel, fibreglass and plastic used during manufacturing, the diesel burned by ships and trucks to transport, energy during construction, etc.). From there, calculations of the carbon pollution generated are undertaken to provide what is called the ‘carbon footprint’. An LCA conducted by Li et al. (2020) found that per 1 kilowatt-hour (kWh) produced, wind energy only consumes 4% of the total amount of CO₂ emissions related to coal power. That is to say that for every 1 kWh of energy produced by burning coal, wind energy can produce 25 kWh of energy for the equivalent amount of CO₂. This clearly demonstrates the benefit of using wind energy as opposed to coal to generate electricity. It is also noted that the emissions associated with wind farms is largely during the construction period, as once the WTGs begin generating electricity, they do so without generating CO₂ emissions from their operation.

As with everything in the modern era, there is an impact resulting from the production and deployment of renewable energy, including wind farms. Materials required to manufacture key wind farm components such as turbine blades, include the use of rare earth metals and other materials sourced from mining activities. Considering the environmental and material impacts from developing wind farms, it has been determined through multiple

studies that it takes a WTG five (5) to eight (8) months to generate the equivalent energy that it took to manufacture, transport and construct the components (Vestas 2021; Peach 2021; Guezuraga, Zauner & Pölz 2012; Martinez et al. 2009), with the energy produced afterwards considered to have zero emissions. The variation in this estimation is dependent on the carbon intensity of the manufacturing process and the electricity displaced by the operational WTG. Manufacturing has the largest impact upon generation of carbon emissions, however energy consumed during manufacturing is further balanced by energy saved from the recycling of components following decommissioning (Martinez et al. 2009; Tremeac & Meunier 2009).

As one submissions states, *‘the construction of wind farms requires extensive mining operations, manufacturing processes, and transportation, all of which contribute significantly to carbon emissions’*. The extensiveness and intensity of carbon emissions and mining operations are considerably lower when compared to traditional energy sources such as coal and gas which rely on the continued extraction of fossil fuels, only to be burned and continually contributing to GHG emissions and climate change.

4.3.2.2. Climate Change

A number of submissions expressed views that climate change is not occurring or that the Project is in some way altering local climates. These concerns are listed below:

- *I went to a meeting in Mudgee that ark energy was hosting regarding the turbines and asked one simple question, what is the connection between wind turbines and micro - climates as in could that mean less rainfall. The general manager told me that he was not aware of studies around this... a complete lie. So what does the next generation of my family do. If the wind turbines create less rain, a direct hit to our income.*
- *Project not needed – we do not have a climate emergency – see attachment*

RESPONSE:

There is a scientific consensus that anthropogenic climate change is being driven by human induced factors, primarily the burning of fossil fuels (Myers et al. 2021). It is now well understood that the burning of fossil fuels is the largest contributor to climate change, accounting for over 75% of global greenhouse gas emissions and nearly 90% of all CO₂ emissions (United Nations Framework Conference for Climate Change 2024). While a significant amount of literature and scientific evidence exists on the reality and impacts of climate change, it is beyond the scope of this Project to justify that anthropogenic climate change is occurring. However, as discussed in the EIS, the Project is a direct response to NSW Government’s commitment to the renewable energy transition as part of their Net Zero Plan and forms a part of the government’s response to addressing the risks associated with climate change. Further justification for the beneficial impacts of the Project with regards to its alignment with climate positive principles are outlined Section 5 of this report,

With regard to the comment regarding the “connection between wind turbines and micro-climates” resulting in less rainfall, the Proponent could not identify any empirical or peer-reviewed evidence that turbines alter rainfall patterns. A number of studies have been conducted in recent years investigating the impact of wind farms on micro-climates (i.e. the area in proximity to WTGs), particularly as a result of ‘turbine wake’. Evidence suggests that there are varying impacts to local micro-climates as a result of wind farms, with turbine wake and turbulence creating ‘vertical mixing’ that can change local temperatures, moisture and CO₂ levels. A study conducted by Stergiannis et al. (2021) found that the wake effect of WTGs had no impact to the local microclimate, while Diffendorfer et al. (2022) assessed impacts to vegetation co-located with wind farms and found both increases and decreases in vegetation greenness, with no trends over time between seasons. Therefore, it appears that it is unlikely based off available evidence that the Project, or wind farms broadly, will alter rainfall patterns and reduce rainfall.

It is important to note that while impacts to micro-climates as a result of WTGs are increasingly being studied, the potential impacts appear to be limited. Alternatively, the build-up of CO₂ in the atmosphere through the burning

of fossil fuels has well understood, global, and long-term impacts. This is opposed to the relatively localised and short-term potential impacts of WTGs (which are absent when not in use). The burning of fossil fuels has a number of impacts from the localised short term heat impacts of physically burning the material, to the global atmospheric changes through an increase in CO₂ parts per million. This is primarily due to WTGs not producing heat through their operation, but rather vertically redistribute the heat that is already present in the atmosphere, which is fundamentally different from the large-scale cumulative greenhouse warming effect as a result of burning GHGs.

There is reference in the literature to the limited impacts of wind turbines creating radar disturbance on local weather stations that may impact the detection of or presentation of rainfall events at those weather stations. As detailed in the Telecommunication Impact Assessment undertaken as part of the EIS, this occurs when some WTGs fall within meteorological radar detection height and show up as static echoes. It is unclear whether the submission is referencing the impact of wind farms on the detection of rain via meteorological radar stations or proposing that WTGs are capable of altering precipitation around the WTGs.

4.3.3. The Project

4.3.3.1. Location of the Project

A number of submissions expressed concern regarding the location of the Project, largely the decision to locate 70 WTGs within a rural setting noted for its natural landscapes and lack of a built environment. Submissions often felt the location of the Project should be located closer to cities and urban areas. Some examples of these concerns are listed below:

- *Ark Energy need to do better and find a location closer to the cities. We need to protect our landscapes because that is what makes rural NSW unique and a desirable place to live.*
- *projects like this are no good for rural communities in NSW. Keep them out and put them closer to the cities. protect our landscapes, wildlife, and lifestyles!*
- *do not put these ugly fixtures on our rural landscapes. put them closer to the city. i object to this project*
- *I strongly object to this wind farm as it will cause pollution and damage the beautiful environment which I know and have personally visited*

RESPONSE:

The Project is located within the CWO REZ which has been identified by the NSW Government for the development of renewable energy projects. The location of wind farms is dependent on a number of contributing factors, including available land, ample wind resources and, following detailed assessment, limited impacts to the surrounding areas. The Project location was selected based on the optimal combination of the following elements:

- High quality wind resource
- Availability of land to support a commercial scale wind farm project
- Low housing density in proximity to the Project
- Located within the CWO REZ and associated proposed high voltage transmission network
- Positive sentiment from local communities regarding renewable energy and interest from landowners being potentially involved
- Access to major transport networks, including the Mitchell and Castlereagh Highways and proximity to Major townships
- Compatible land use zoning within both the Project Site and adjacent land holdings.

The Proponent has acknowledged that the Burrendong Wind Farm will not be without its impacts, however the location selected to host the wind farm is considered to be a suitable option. The location of the Project is considered appropriate largely due to its location within the NSW Government's CWO REZ, which will play a vital role in delivering affordable energy across the state and help offset the impacts of an aging coal plant fleet in the coming decades. The benefit of locating the Project in the REZ is its proximity to other projects which will allow for

the generation and storage of wind and solar power in an efficient manner to be transmitted across NSW. An added benefit to these Zones is that it will reduce the impacts of projects across the state as they are focused in particular areas.

The Project has been assessed in accordance with all relevant guidelines and policies in order to ensure that it will provide the maximum benefit to stakeholders and community members while avoiding and minimising impacts wherever possible. While avoiding impacts to any stakeholder is the optimal outcome, locating wind farms in rural and lightly populated areas helps to mitigate impacts of a project on people within the landscape. This is significantly harder to achieve in more urban/suburban areas where the density of dwellings is higher. Furthermore, there are no non-involved dwellings located within the potential blade throw risk zone around a WTG, being approximately 800 m. This proximity would also be significantly more difficult to achieve in more built up areas and therefore would put people at a greater risk of potential blade throw impacts.

As mentioned above, another contributing factor into the selection of the Project Site was the appropriate land zoning of the site and surrounding areas. Land zoning in NSW dictates the types of development that is permissible within a lot. In accordance with the *NSW State Environmental Planning Policy (Transport and Infrastructure) 2021*, the Project is permissible, even though it is located on land zoned RU1.

The Proponent has consistently endeavoured to refine the Project design through consultation with landholders, neighbours, community members and Council to develop a design that avoids and minimises impacts wherever possible, whilst providing tangible benefits across a range of stakeholders. The Proponent acknowledges that there are members of the community that would prefer the Project did not go ahead for a range of reasons they have taken the time to provide. Throughout the process, the Proponent has sought to reach agreements with as many neighbours as possible to accommodate community views and to refine the Project to address as many concerns as possible.

4.3.3.2. *The Proponent*

A number of submissions expressed concern regarding the Proponent of the works, specifically regarding perceived motives and business practices with the potential to negatively affect the members of the community. Some examples of these concerns are listed below:

- *This project is not in the public interest. This project is only in Ark Energy's interest as it will sell the project prior to operation and the new owners will discover there are many "errors" to sort.*
- *Apparently, Ark Energy is an Australian Company. Ark Energy being owned by Korea Zinc is not an Australian owned business but is with Korea Zinc which has a poor reputation within Australia.*

RESPONSE:

NSW Government renewable commitments

The Proponent of the Project is Burrendong Wind Farm Pty Ltd, a wholly owned subsidiary of the Proponent which acquired Epuron in 2022, one of the most experienced wind energy development companies in NSW. Having acquired Epuron, the Proponent took ownership of Epuron's large portfolio of wind and solar energy projects across NSW, Queensland and Tasmania, with over 2 gigawatts of renewable energy in development, under construction or currently operating. The Proponent acknowledges that the company is a subsidiary of Korea Zinc Co. Ltd which is a foreign owned company. However, the Proponent is committed to continue developing wind and solar projects throughout Australia to benefit Australians and combat climate change through renewable energy generation.

The application for Development Approval for the Project has been made by the Proponent, a registered Australian Proprietary Company regulated by the Australian Securities and Investment Commission. A proportion of capital expenditure required to develop the Project will flow to the local economy as outlined in the EIS and Economic

Impact Assessment through the hire of local businesses and workers, the expenditure of wages, associated landholder agreements and Council payments. Prior to construction, the Proponent will develop a Local Business and Employment Strategy which will be aimed at maximising the use of local businesses and workers within the DRC and MWRC LGAs. It is important to note that the majority of land, excluding land owned by WaterNSW, proposed for the siting of wind farm infrastructure will be leased from small-scale landowners, including multi-generational farming families with long histories in the region. The additional income will assist these landholders to diversify their earnings and re-invest in the development and expansion of their properties which will provide a beneficial effect on both the local and NSW economy.

4.3.3.3. The Project

An objection to the Project was based on the ‘misleading premise of the life of the project’, with the submission stating *“The Project has an anticipated operational life span of thirty years. This is incorrect and misleading. Further on in the EIS they state that the operational life span could increase to sixty (60) Years. With that many years the EIS needs to be considered for the sixty (60) years and not the thirty (30) years.”*

RESPONSE:

The operational lifespan of the Project, as with wind farms in general, is expected to occur over a thirty year period. The EIS states that following the conclusion of the 30-year operational lifespan, the Proponent will review a number of factors, including market conditions and current technologies to determine whether Project equipment can be replaced or be fully decommissioned and rehabilitate the site. It is noted that for the Project to operate for an additional 30 years (totalling 60 as referenced in the submission), the Proponent would have to seek additional government approval and could not unilaterally extend the life of the operation. Therefore, it is beyond the scope of the EIS to consider the impacts of the Project over a 60 year timeframe.

4.3.4. Procedural Matters

4.3.4.1. Consultation

A number of submissions expressed concern regarding the perceived lack of consultation undertaken for the Project and the impact of consultation on perceptions of the Project within the local area. Some examples of these concerns are listed below:

- *Ark Energy did not consult with us or the community before they decided on their proposed Turbine layout. This means that they blatantly did not follow the rules.*
- *the community and wildlife seem to have no say in this and i am acting as a voice in support of them. this project will destroy the landscape and health of nearby residents and wildlife/livestock. They did not ask for this, so they should not have this project forced upon them*
- *The developers have had over five (5) years to put all of this together. But we have only been given twenty-eight (28) days to read and analyze some 526 pages within the EIS main document plus 27 supportive documents to read and analyze. If this is meant to be a fair system, then this is NOT. Ninety (90) days submission would be more appropriate, then we could obtain outside advice on the submission*
- *As a landholder in the Central West, I feel the way I have found out about the Burrendong wind farm has been by chance and I believe that Eupuron/Ark Energy has been disingenuous in their community consultation*
- *We were promised at the first and other meetings that there would be neighbor agreements, apparently as recommended by CEC guidelines. This is discussed in section 6.14. To date other than the first two approaches in 2018 nothing has occurred as promised. Yet again another broken promise from Ark Energy*

RESPONSE:

The Proponent acknowledges the requirements in the SEARs and DPHI policies on community consultation which are key components of developing a renewable energy project that has the social license to operate within a community. The Proponent undertook various forms of consultation throughout the planning phase of the Project and will continue to do so, having begun consultation in 2018. The consultation undertaken has involved communication with local stakeholders, landowners, neighbouring property owners, Councils, local service providers and relevant Government agencies. Types of consultation undertaken included attendance at local events, public meetings, newspaper advertisements, and emails among other forms. An independent consultation process was also undertaken by Ethos Urban who prepared the Social Impact Assessment and discussed the community consultation process in Section 6.2 of the SIA.

Concerns and feedback regarding the Project were identified throughout the engagement and consultation process and have been considered by the Proponent to better refine the Project design. This refinement occurred throughout the EIS phase and continues to help inform and guide the Project. The Social Impact Assessment prepared for the Project provides a consolidation of community consultation outcomes that informed the assessment and evaluation of the Project on relevant social factors as well as ways to mitigate identified impacts. The SIA considered impacts across several key social factors, including:

- Community composition, cohesion and general sense of community
- Neighbouring properties
- Social amenity of the region
- Community participation
- Accessibility and way of life
- Health and wellbeing.

A submission was received stating the consultation undertaken by Ethos Urban during the SIA process was 'insufficient'. The Ethos Urban SIA Project Director notes that they spoke to the submitter via a 1-on-1 consultation and their commentary helped to directly inform the SIA alongside other consultation outcomes. Furthermore, the submission provided above describes 'broken promises' in the form of a lack of consultation since 2018. The Proponent notes that during discussions with and through receipt of feedback from Burrendong Save Our Surroundings (SOS) and other opponents of the Project it was communicated to the Proponent that these stakeholders were not interested in entering into neighbour agreements or benefit sharing arrangements. Efforts by the Proponent were made to accommodate for potential impacts of the Project with members of the community through the use of agreements or benefit sharing arrangements. As these mitigations were not considered an option by these members of the community, the Proponent considered the matter of consultation in that regard to be finalised, while maintaining consultation in a broader sense as discussed throughout the EIS and this report.

It is noted that stakeholders may feel the 28 day exhibition period of the EIS is an insufficient amount of time to fully review and provide feedback. The Department of Planning, Housing and Infrastructure *State Significant Development Guidelines* (DPHI 2024b) outline the requirements for the public exhibition and community participation in assessing SSD projects. The Guidelines are based on community participation requirements in Schedule 1 of the EP&A Act which require the exhibition for a minimum of 28 days.

A number of submissions raised concerns around the subject of compensation for non-associated landholders and members of the community. Some examples of these concerns are listed below:

- *The living conditions will change for the worse, the value of our properties will decrease significantly - Where is the compensation plan to compensate residents that will be forced to live with wind turbines if this project is approved?*

- *At the first meeting we were promised community sharing for compensation in 2018. Still waiting in 2023 for an answer to this from Ark Energy*
- *In the overview of the Economic section it now states that there will be neighbouring landholder payments. What will these be? Who will be included as neighbouring landholders? Arc Energy needs to detail exactly who are the neighbouring landholders and what the compensation will be prior to the submission of the EIS so as the neighbouring properties can make a proper assessment of their position.*
- *The EIS states that the proponents will "Provide mutually agreed opportunities for landowners, neighbours, and the wider community to share in the benefits of the Project". There is no detail on how this will be done nor is there any indication that the proponents intend to enter into a VPA or how the benefits will be shared between towns.*

RESPONSE:

The Proponent acknowledges that not all members of the community have approved of these design approaches and have shared their views with both the Proponent and the DPHI (via the EIS assessment process) as to how this Project has adversely impacted community cohesion. The Proponent has acknowledged their points of view and attempted to provide factual and accurate advice to alleviate any outstanding stakeholder worries or concerns throughout the Project Development and Approvals Process. Given the Proponent's experience in developing other large-scale wind and solar projects, the Proponent is confident socioeconomic benefits (local employment, economic diversification, community investment, local production of clean energy) will become evident to the community should the Project proceed.

As discussed in the EIS, one of the local benefits of the Project are the introduction of voluntary neighbour agreements offered by the Proponent in line with the recommendations of both the Visual Bulletin (DPE 2016b) and the CEC Guidelines (2018). The Proponent has offered agreements to a number of neighbouring properties with further agreements proposed, but not accepted, by a number of additional property owners. Agreements were offered as an additional means of acknowledging that residual impacts may still occur, and that the anticipation of potential impacts may be a cause of some concern to some neighbours. The agreements were also provided as a proactive means of sharing a portion of the profits expected to flow from the wind farms operation. Engagement with neighbours has continued over the past six months to ensure the details of the agreements are clear and acceptable to the recipients. Further, unique commitments to maintaining positive relations were also provided to some neighbours in response to specific concerns (i.e. road and transport safety measures), including through the proposed implementation of vegetation screening to reduce visual impact as described in Section 10.4 of the Landscape and Visual Impact Assessment.

The wider community is set to benefit from a project benefit sharing arrangement with the total value of benefit sharing payments to be \$1,050/MW per annum, administered by the DRC and MWRC. Based on the expected Project capacity, \$400,000 to \$500,000 will be injected into the communities each year, over the 30 year life of the Project, which is envisaged to stimulate the local economy and provide resiliency to the community.

4.3.5. Issues Beyond the Scope of the Project

4.3.5.1. Insurance

The Project received a submission that, in part, raised concern regarding public liability insurance, stating they are concerned there will be an "increase of public liability insurance on local residents, farms and businesses."

The Proponent will maintain necessary public liability insurance for the Project. With regard to increase in public liability insurance for local residents, farms and businesses, feedback from the Insurance Council of Australia in 2020 indicated that the majority of underwriters signalled that the proximity of, in this case a solar farm, would not influence a decision to underwrite, nor would it impact the quantum of the risk premium (NGH Consulting 2020). The Insurance Council similarly noted that they were unaware of any mandated requirements for a rural

policy holder to increase their liability coverage. Based on this advice, it is anticipated that there would not be any effect on the ability of neighbouring properties to obtain cost effective insurance premiums (NGH Consulting 2020).

4.3.5.2. Anti-Slavery

The Project received submissions that alleged the Project would utilise slave labour through the development of the Project as components required rely on the use slave labour from developing countries. These concerns are presented below:

- *I object strongly to these systems based upon the fact that they rely on mining by child slave labour in under-developed countries. Australia should NOT support such reprehensible actions.*
- *Even someone that has done the smallest amount of research in to this so called 'green energy' knows that it take a lot more of the earths minerals, slave labour & so on to produce these things.*
- *The impact of obtaining minerals to support wind farms, who mines these minerals, aren't they using children as almost slave labour?*

It is acknowledged that there is evidence of serious modern slavery risks in the production and distribution of renewable energy (CEC 2022). The Proponent is strongly committed to eliminating the risk, to the extent possible, of modern slavery occurring within its own business, in its supply chains or through any other business relationship. This involves compliance with all applicable Australian and international slavery legislation, including the *Modern Slavery Act 2018* (Australian Commonwealth) and any state-based legislation that may be applicable. The NSW *Modern Slavery Amendment Bill 2021* is an amendment to the NSW *Modern Slavery Act 2018* which provides additional provisions with respect to slavery, slavery-like practices and human trafficking. The Proponent will comply with all obligations of the NSW *Modern Slavery Act 2018*.

Additionally, the Proponent will explore the adoption of the CEC's 'Pledge Against Modern Slavery' which sets a commitment for CEC members to manage modern slavery risks, as well as keep up to date with the NSW Governments proposed Code of Practice on Managing Modern Slavery Risks in Renewable Energy Value-Chains ('Renewables COP') that is currently in consultation at the time of writing.

5. Updated Project Justification

5.1. Strategic Need for the Project

The Project proposes to develop a wind farm with up to 70 WTGs with an installed capacity of 400 – 500 MW. The capacity factor of a wind turbine refers to the effectiveness of converting wind energy into electricity. In Australia, the average capacity factor of wind turbines is approximately 35% (Geoscience Australia 2023). Using the average capacity factor as a guide, the Project is expected to produce between 1,379,700 MWh and 1,533,000 MWh per year, calculated using the formula for annual MWh production of 8,760 hours (365 days x 24 hours) x 35% (average capacity factor) x 450/500 MW (installed capacity of the Project). This is projected to produce enough clean energy to power the equivalent of 247,000 NSW households and offset 900,000 tonnes of CO₂e emissions each year (ELA 2023a).

As discussed in Section 2.1 of the EIS (ELA 2023a), Australia is undergoing a once in a generation shift in the way that energy is produced. The transition is largely in response to challenges of climate change and the impacts of decades of burning fossil fuels. The Project will help reduce the impact of energy generation on the natural environment as renewable energy continues to reduce its overall emissions impact, with Nassar et al. (2024) finding wind farms now have a CO₂e payback period of roughly 4-12 months. In essence, the Project is expected to become carbon neutral within approximately one year of operation. With an expected operational lifetime of 30 years, this will provide decades of zero emissions energy to the NSW electricity grid. It will also provide a variety of social and economic benefits across a range of stakeholders from associated landholders, the local community, and the wider region.

On 11 December 2023, the NSW Government enacted the *Climate Change (Net Zero Future) Act 2023* which legislates the NSW GHG emissions targets. The Act set the emissions target of 50% by 2030 and 70% by 2035 in order to achieve net zero by 2050. A central component to achieving the legislated emissions reduction targets will be the decarbonisation of the energy grid, traditionally reliant on coal-fired power. The Act serves as the legal framework from which various governments, industries and community groups can undertake actions in line with the targets. Legislating the emissions reduction targets, with the incorporation of existing targets as discussed below, is a critical component in driving broad change in both the energy landscape and more broadly throughout the state. As of 2021, the NSW electricity sector contributed 49,338,400 tonnes of CO₂e, or 43% of the total emissions of NSW (Beyond Zero Emissions 2023). With an expected installed capacity of 450 – 500 MW, the Project is set to offset 900,000 tonnes of CO₂e, each year representing 1.8% of the total emissions generated in the NSW electricity sector. The Project is therefore poised to provide a significant and valuable contribution to the NSW renewable energy mix and efforts more broadly to reduce emissions.

The Project will play a vital role in addressing the need for affordable, renewable electricity to assist in transitioning away from polluting fossil fuels as well as providing material benefits to local communities via the Project community benefit sharing agreements. The Project is expected to provide the following strategic benefits:

- help mitigate the impacts associated with global warming and climate change by displacing up to 900,000 tonnes of CO₂e from the current NSW energy generation supply, which remains reliant on coal powered generation
- produce between 1,39,700 MWh to 1,533,000 MWh annually, resulting in over 45 million MWhs over 30 years
- contribute to the Australian Government's commitment to reducing emissions by at least 43% by 2030 in accordance with the Paris Agreement
- contribute to the forecasted 82% share of energy generation by renewables (Australian Energy Market Operator [AEMO] 2022)
- contribute to reducing approximately 1.8% of the emissions generated in the electricity sector

- contribute to the NSW emissions reduction target of 50% by 2030, and net zero by 2050 in line with the *Climate Change (Net Zero Future) Act 2023*
- implement the aims of the NSW Electricity Strategy by providing over \$30 million in capital investment in the NSW electricity system, particularly within regional NSW
- provide a cheap and reliable source of energy generation that is well positioned to meet future demand for electricity, possesses one of the lowest production costs, uses no water during electricity production and is a mature technology acceptable to energy utilities in comparison to other renewable energy sources
- provide a source of energy generation that is competitive in cost through technological advancements and LCOE with the global weighted average falling 5% between 2021 and 2022 from USD \$0.035/kWh to USD \$0.033/kWh (IRENA 2023)
- produce energy that has a low carbon intensity across the Project life compared to other forms of energy;
- provide benefits to associated landowners, neighbours, and the wider community via the community benefit sharing agreement
- provide a peak of approximately 250 FTE jobs during the construction phase, generate significant local investment through wage stimulus that is likely to be spent within nearby local and regional communities such as Yarrabin, Hargraves and Mudgee.

5.2. Evaluation of Submissions and Project Benefits

5.2.1. Site Suitability

A thorough site selection process was undertaken by the Proponent to identify the Project Site for potential wind farm development. The following factors were considered as part of the process:

- Suitability of the wind resource: the Proponent has monitored the wind resource at the Project Site since 2018
- Ease of connecting to and capacity of the local electricity transmission network: the Project is situated near existing transmission lines and electrical connection points near Burrendong Dam and initial assessment has identified suitable capacity to connect to the existing infrastructure, negating the need to construct a new transmission corridor
- Site access and general ground conditions, including slope and geology: Within the Project Site there are existing tracks which will be upgraded for use during the construction and operational phase, reducing the requirement to construct new tracks
- Existing land use: the Project Site is predominantly an agricultural area with a very low-density population within and around the Project Site. Once the construction of the Project is complete there will be minimal disruption to the area during the operational phase.

Additionally, the Project is situated within the CWO REZ which was identified for its strong renewable energy resource potential, proximity to existing electricity network and integration with existing land uses.

5.2.2. Environmental, Social and Economic Considerations

During the preparation of the EIS, extensive environmental surveys and community consultation was undertaken to assess the current environment and gain feedback from the local community on the Project. This process identified potential site constraints and concerns raised by the community.

The amendments to the Project following submission of the EIS reduced the environmental impacts where possible particularly in relation to biodiversity and aboriginal heritage. Post approvals, management plans will be prepared to ensure that the impacts are managed and monitored effectively. These measures are outlined in Appendix C of the Amendment Report (ELA 2026a).

5.3. Ecologically Sustainable Development

One of the key objectives of the EP&A Act is to encourage the implementation of ESD in NSW. The Project seeks to achieve the principles of ESD through the development of a wind farm that provides significant benefits that outweigh any potential impacts. The principles of ESD encompass the following:

- the precautionary principle
- inter-generational equity
- conservation of biological diversity
- valuation and pricing of resources.

The underlying principle of ESD is that current and future generations should be able to live in an environment that is of the same or improved quality to the one that is inherited. In the EIS (Section 7.3.1) prepared for the Project, a full analysis was undertaken to detail the ways in which the Project is consistent with the above principles. While minor amendments have been made since the EIS was submitted, as outlined in Section 3, the Project remains consistent with the principles of ESD as originally outlined. For example, the precautionary principle underpinned multiple assessments to consider the worst-case scenarios or to provide conservative estimates allowing for considerations to be made that provided greater protection from potential impacts than what is likely to occur.

Furthermore, extensive management and mitigation measures will be implemented throughout the life of the Project. This includes various monitoring programs to measure predicted impacts against actual impacts of the Project.

6. Conclusion

Since the submission of the EIS and the public exhibition period in December 2023, the Proponent has continued consultation with government agencies, local government and communities. The submissions received during the public exhibition of the EIS have been reviewed and analysed, resulting in amendments to the Project design and layout. The amendments are summarised below and within Table 6-1:

- Change in Project Site boundary that incorporates removal of land due to removal of the northern powerline option, in part to avoid potential impacts to identified Aboriginal heritage sites or valued areas following consultation with Aboriginal Stakeholders and RAPs
- Change in Development Corridor:
 - Realignment of a section of access track to reduce impacts to Box Gum Woodland that was classified in 'good' condition
 - Realignment of a section of access track to WTG 49 to avoid impacts to Aboriginal Site
 - Addition of an alternate access track (option A) at the Project Site entrance through the Cudgegong River Holiday Park to reduce impacts to native vegetation. During detailed design either option A or option B will be selected
 - Realignment of the wind farm powerline to avoid proposed Yarrabin Phoenix PHES infrastructure and more detailed design of power line power poles to reduce impacts to TECs, associated impact areas and powerline construction access tracks
 - Expansion of area around the construction compound to include a TWAF
- Refinement of the 330kV powerline, resulting in the following changes:
 - reduction of the Development Footprint within the powerline easement disturbance area
 - the concept design of access tracks to enable the construction of the powerline and power poles, utilising existing farm tracks as much as possible to minimise the need for clearing of vegetation.

Table 6-1 Project Amendments Summary

Project Element	Original Project (EIS 2023)	Amended Project
Project Site	29,176 ha	27,086 ha (a reduction of 2,090 ha)
Development Corridor	3,058 ha	1,322ha (a reduction of 1,736 ha)
Development Footprint	855 ha	Option A – 719.75 (a reduction of 135.25 ha)
		Option B – 721.17 (a reduction of 133.83 ha)
		Total – 730.73 ha (a reduction of 124 ha)

The Project has considered additional ways to reduce impacts following the submissions received and amendments. The mitigation measures associated within the Project have been reviewed and updated where necessary to further reduce the potential impacts. An updated mitigation measures table is provided in Appendix C of the Amendment Report (ELA 2026a).

- Whilst there are impacts across a range of factors, the Project has multiple benefits including: mitigate the impacts associated with global warming and climate change by displacing 900,000 tonnes of CO₂e from the current NSW energy generation supply, which is heavily reliant on coal powered generation
- Contribute to achieving Australia's commitment to the Paris Agreement of reducing emissions by at least 43% below 2005 levels by 2030

- Contribute to three (3) UN Sustainable Development Goals:
 - Goal 7 – Affordable and Clean Energy
 - Goal 11 – Sustainable Cities and Communities
 - Goal 13 – Climate Action
- Contribute to achieving Australia’s annual Renewable Energy Target to install 33,000 GWh of renewable energy
- Implement the aims of NSW’s Net Zero Plan Stage 1: 2020-2030 and contribute to NSW’s aspirational target of reducing GHG emissions by 50% by 2030, compared to 2005 levels and net zero emissions by 2050
- Implement the aims of NSW’s Electricity Strategy by providing over \$30 million in capital investment in NSW’s electricity system, particularly in regional NSW
- Provide a source of energy generation that is well positioned to meet future global and national demand for electricity, which possesses one of the lowest production costs, uses no water during electricity production and is mature technology acceptable to energy utilities in comparison to other renewable energy sources
- Provide a source of energy generation that is competitive in cost through technological advancements and LCOE (IRENA 2021)
- Provide energy generation technology that has a low carbon intensity across the Project life compared to other forms of energy
- Provide mutually agreed opportunities for landowners, neighbours, and the wider community to share in the benefits of the Project such as community benefit contributions, community co-investment opportunities and the establishment of a community benefit fund
- Provide approximately 250 FTE jobs consistently during the construction phase.

The amendments made to the Project as a result of the issues raised by government agencies, local government and community have reduced the impacts as far as possible whilst still maintaining a viable Project. The remaining impacts will be mitigated or offset in accordance with the mitigation measures proposed and any planning conditions imposed on any development consent granted for the Project.

7. References

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Appendix A : Submissions Register

Group	Name	Section where issue addressed in Submissions Report
Public Authorities	BCS	Section 4.1.1
	CASA	Section 4.1.2
	Crown Lands	Section 4.1.3
	DPE – Hazards	Section 4.1.4
	DPE – Water	Section 4.1.5
	DPI – Agriculture	Section 4.1.6
	DPI - Fisheries	Section 4.1.7
	EPA	Section 4.1.8
	FRNSW	Section 4.1.9
	Heritage Council of NSW	Section 4.1.10 (Aboriginal Heritage) Section 4.1.11 Historic Heritage)
	MEG NSW	Section 4.1.12
	RFS	Section 4.1.13
	TfNSW	Section 4.1.14
	WaterNSW	Section 4.1.15
	UGL Regional Linx	Section 4.1.15
Councils	DRC	Section 4.2.1
	MWRC	Section 4.2.2

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Chris Theocharous	Hargraves						✓										✓	
Name Withheld	Leeton			✓			✓										✓	
Jeanine Bird	Leeton			✓			✓											
Name Withheld	Guyra																	
Name Withheld	Lake Albert						✓										✓	
Name Withheld	Hargraves	✓		✓	✓												✓	
Sally Edwards	Tambar Springs	✓		✓					✓	✓		✓	✓				✓	
Justine & Todd Clarke	Valley Heights	✓	✓				✓		✓	✓		✓		✓				
Shelley Tunbridge	Yarrabin		✓									✓						
Jonathon Martin	Dunedoo				✓		✓					✓	✓					
Anna Ferguson	Bootawa	✓		✓													✓	
Name Withheld	Coolah																	
John McBratney	VIC	✓	✓														✓	
Name Withheld	Koorinal	✓	✓	✓													✓	
Natalie Coleman	Warriewood	✓	✓	✓												✓	✓	✓
David Landini	Wakool			✓					✓				✓					
Anne Bowman	Dunedoo	✓		✓	✓		✓		✓	✓	✓		✓		✓			
Emma Bowman	Dunedoo	✓	✓		✓		✓		✓	✓	✓		✓		✓			
Name Withheld	Weetabila			✓	✓	✓	✓								✓			
Name Withheld	Binnaway			✓														
Name Withheld	Binnaway			✓													✓	
Name Withheld	Binnaway	✓							✓									
Name Withheld	Neilrex			✓					✓				✓					
Name Withheld	Binnaway	✓											✓					
Name Withheld	VIC			✓														
Name Withheld	Binnaway	✓		✓														
Name Withheld	Binnaway	✓											✓					
Name Withheld	Binnaway	✓							✓									
Name Withheld	Mollyan	✓														✓	✓	
Name Withheld	Coonabarabran	✓															✓	
Name Withheld	Coonabarabran	✓		✓													✓	

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Name Withheld	Mendooran			✓													✓	
Name Withheld	Mendooran	✓		✓					✓									
Name Withheld	Mollyan	✓					✓		✓									
Frances Bowman	Tambar Springs			✓	✓		✓			✓			✓					
Name Withheld	Hargraves	✓		✓					✓				✓					
Name Withheld	Hargraves	✓		✓			✓						✓					
Ruth Withers	Uabry																	
Warren & Jane Coates	Hargraves		✓	✓		✓			✓		✓		✓			✓	✓	
John Angelico	VIC										✓							
Name Withheld	Ryde	✓																
Name Withheld	Yarrabin			✓													✓	
Steven White	Uabry																	
Stan Moore	Gundary				✓					✓	✓							
Eleanor Hanrahan	Balmain	✓							✓									
Name Withheld	Yarrabin	✓		✓														
Name Withheld	Wahroonga	✓																
Name Withheld	Weetabila					✓	✓		✓									
Name Withheld - C																		
Krystle Rheinberger	Yarrabin	✓	✓	✓	✓				✓					✓				
Name Withheld	West Pennant Hills	✓		✓								✓						
Phillip Brown	Young																	
Michaela Primmer	Grattai	✓	✓	✓														✓
Suzie Coric	Yarrabin		✓														✓	
Name Withheld	Hargraves																✓	
Gemma Pride	Yarrabin	✓	✓	✓	✓							✓					✓	
Name Withheld	Warrawee																	
Name Withheld	Kilarney Vale	✓		✓														✓
Name Withheld	Coffs Harbour	✓		✓														
Name Withheld	Dunedoo	✓		✓														
Nicholas Maynard	Greenwich	✓		✓														
Name Withheld	Hargraves	✓		✓				✓										

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Karl Coates	Terrey Hills	✓		✓														
Monica Christensen	Mosman	✓	✓	✓														
Name Withheld	Allambie Heights	✓																
Gabby Hodginson	Dubbo	✓		✓			✓			✓			✓					
Name Withheld	Rouse Hill	✓											✓					
Marian Panetta	Dubbo	✓		✓			✓										✓	
Name Withheld	Wahroonga	✓	✓	✓			✓											
Name Withheld	Portland	✓	✓	✓			✓											
Name Withheld	Galston			✓									✓					
Eddie de Wet	Tweed Heads	✓																
Anne Green	QLD		✓	✓									✓					
Kellie Beard	Manly	✓	✓	✓					✓				✓					
Jacqueline Coates	Hargraves	✓		✓												✓	✓	
Samantha Ledgerwood	QLD	✓		✓					✓									
Nathan Coates	Hargraves	✓							✓	✓		✓						
Ben Harmer	Illawong	✓																
Darren Harttus	Twelve Mile				✓						✓		✓					
Name Withheld	Yarrabin		✓		✓													
Name Withheld	Redfern	✓																
Tim Pace	Forrestville	✓					✓											
Name Withheld	Worlds End	✓					✓				✓		✓					
Name Withheld	Forrestville									✓								
Name Withheld	Greystenes	✓															✓	
Martin Fogarty	Cammeray	✓		✓														
Name Withheld	Manly	✓		✓								✓					✓	✓
Ross Pride	Yarrabin	✓			✓								✓					
Name Withheld	Mudgee																	
Name Withheld	Arcadia																	
Name Withheld	Mount Knowles	✓	✓														✓	
Name Withheld	Arcadia			✓														
Name Withheld	Dee Why			✓									✓					

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Name Withheld	Avoca Beach																	
Name Withheld	Brooklyn			✓														
Name Withheld	Bexley	✓	✓															
Name Withheld	Collaroy			✓														
Pierre La Bas	Palm Beach																	
Name Withheld	Maysfield West																	
Amber Pederson	Yarrabin	✓	✓	✓					✓				✓					✓
Name Withheld	Neutral Bay																	
Greg Pace	Fitzroy Falls	✓		✓												✓		
Name Withheld	Old Toongabbie																	
Name Withheld	Drummoyne	✓															✓	
Name Withheld	Boat Harbour			✓						✓								
Nicole Shepherd	Balgowlah	✓											✓					
Grant Piper	Coolah					✓												
Name Withheld	Coolah	✓		✓	✓													
Jillian Lovelace	Emu Plains												✓					
David Marks	Cronulla	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓
Troy Green	Yarrabin	✓											✓					
Name Withheld	Paddington																	
Name Withheld	Drummoyne	✓	✓	✓					✓			✓	✓			✓	✓	
Veronica Lovelace	North Curl Curl												✓					
Caoimbe Lalor	Narrabeen	✓														✓		
Janet Norton	Armidale											✓					✓	
Brylee Blu	Woy Woy	✓																
Larimar Blu	Woy Woy	✓																
Name Withheld	North Narrabeen																	
Name Withheld	Coolah											✓						
Name Withheld	Coolah			✓														
Name Withheld - C																		
Name Withheld	ACT	✓	✓	✓													✓	
Name Withheld	Burleigh Heads																	

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Name Withheld	Worlds End	✓	✓															
Annette Piper	Coolah	✓	✓	✓		✓						✓					✓	
Ben Heat	Narrabri	✓																
Ajay Correra	Yarrabin	✓	✓	✓														
Brian Walsh	Illawong	✓		✓	✓							✓						
Nicole Rossetto	Burundulla			✓														
Name Withheld	Long Jetty	✓		✓							✓	✓						
Paul Gregg	Twelve Mile	✓		✓	✓		✓		✓			✓						
Stephen Lowe	Yarrabin	✓	✓								✓							
Zoe Boyce	Dunedoo	✓		✓														
Name Withheld	Elanora Heights	✓		✓							✓						✓	
Sophie Homan	Elanora Heights			✓														
Caroline Homan	Elanora Heights	✓		✓								✓						
Name Withheld	Drummoyne	✓	✓	✓				✓									✓	
Name Withheld	Maitland Bar		✓	✓							✓							
Name Withheld	Drummoyne	✓	✓	✓		✓	✓					✓					✓	
Vanessa Parish	Narrabri	✓		✓													✓	
Brendan Greenback	Bootawa	✓		✓	✓		✓		✓						✓		✓	
Name Withheld	Bexley	✓										✓					✓	
Name Withheld	Mudgee	✓	✓	✓														
Name Withheld	VIC																	
Name Withheld	Mudgee	✓		✓														
Jill Baggett	Mudgee	✓		✓													✓	
Name Withheld	Kilarney Vale	✓		✓														✓
Sally-Anne Kears	Cullenbone	✓		✓					✓			✓						
Name Withheld	Mudgee								✓									
Name Withheld	Yarrabin	✓	✓	✓	✓		✓		✓			✓						
Terrence Conn	Yarrabin			✓	✓													
Margaret Conn	Yarrabin		✓	✓	✓													
Paul Tannous	Hargraves	✓	✓	✓								✓						
Dave Pederson	North Narrabeen	✓		✓							✓						✓	

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Liv Pederson	Boat Harbour	✓		✓					✓									
George Pappdopoles	Kellys Plains		✓	✓														
Name Withheld	Yarrabin		✓	✓	✓				✓				✓					✓
Name Withheld	Dee Why																	
Grant Robinson	One Mile																	
Dianne Norris	Elanora Heights	✓	✓						✓		✓							
Name Withheld	Olinda																	
Vanessa Riley	Mudgee			✓					✓				✓					
Cam Tunbridge	Blue Haven			✓														
Name Withheld	Gulgong																	
Name Withheld	Gulgong				✓													
Sasha McNaughton	Freshwater			✓													✓	
Name Withheld	Yarrabin	✓		✓									✓				✓	
Name Withheld	Mudgee	✓	✓	✓	✓							✓						
Sam Bugge	Cobram	✓		✓														
Greg Pogson	Mollymook Beach			✓					✓									
Daniel Wright	Matraville	✓	✓	✓														
Name Withheld	Mosman	✓		✓														
Name Withheld	Cattai	✓																
Name Withheld	Cattai	✓																
Kerry Missingham	Gorokan	✓		✓														
Janita Kinsey	Trangie	✓	✓	✓	✓	✓	✓										✓	
Name Withheld	Matraville	✓		✓							✓						✓	
Justin Gard	Hargraves	✓		✓							✓						✓	
Name Withheld	Wallaga Lake	✓		✓														
Name Withheld	Avalon	✓															✓	
Hugh Taylor	Worlds End	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓					
Name Withheld	Queenscliff	✓																
Jason Sestic	Woollahra	✓																
Richard Tunbridge	Yarrabin	✓		✓														
Catherine Bowman	Dunedoo			✓					✓	✓								

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Name Withheld	Warriewood	✓		✓														
Bryxe Statis	Collaroy	✓																
Diane Statis	Collaroy	✓																
Sarsha Sherriff	Fannie Bay	✓	✓	✓														✓
Tenille Kerin	Charlestown	✓		✓														✓
David Mills	Newport	✓		✓						✓		✓		✓				
Name Withheld	Greenwich	✓		✓												✓	✓	
Regina Mills	Newport			✓														
Name Withheld	Boat Harbour			✓														✓
Name Withheld	Greenwich	✓																
Name Withheld	Far Meadow	✓		✓								✓						✓
Gregory Towley	Far Meadow	✓		✓						✓		✓				✓	✓	
Nat Barton	Wellington	✓			✓				✓	✓				✓				
David Bowman	Dunedoo			✓	✓	✓	✓				✓		✓					
Name Withheld	Drummoyne	✓		✓														
Name Withheld	Hargraves	✓														✓		
Lenka Vala	Swansea			✓														✓
Name Withheld	Mudgee			✓					✓									✓
Greg Pride	Mona Vale	✓	✓	✓								✓						
Name Withheld	VIC																	
Name Withheld	Balgowlah	✓		✓														
Name Withheld	Mollyan			✓														
Name Withheld	Mollyan			✓														
Ian McDonald	Walcha									✓								
Name Withheld	Mudgee	✓		✓			✓				✓							✓
Name Withheld	Piambong	✓																
Name Withheld	Lake Cargelligo	✓		✓														
Name Withheld	Piambong	✓																
Steven Cadd	Yarrabin	✓		✓														
Errol Edwards - C																		
Rick Campbell	Beryl	✓					✓											

Name	Locations	Economic, environmental, and social impacts of the Project																
		Visual (Section 4.3.1.1)	Noise / Vibration (Section 4.3.1.2)	Biodiversity (Section 4.3.1.3)	Traffic (Section 4.3.1.4)	Aviation (Section 4.3.1.5)	Fire / Bushfire (Section 4.3.1.6)	Heritage (Section 4.3.1.7)	Land Use (Section 4.3.1.8)	Water / Soils (Section 4.3.1.8)	Waste (Section 4.3.1.9)	Social (Section 4.3.1.10)	Economic (Section 4.3.1.11)	Air (Section 4.3.1.12)	Biosecurity (Section 4.3.1.13)	EMF (Section 4.3.1.14)	Health (Section 4.3.1.15)	Light (Section 4.3.1.16)
Name Withheld	Illawong																	
Name Withheld	Yarrabin	✓	✓	✓	✓				✓			✓	✓					
Ben Rouse	QLD				✓													
Clare Button	Yarrabin	✓		✓			✓						✓					
Name Withheld	Waverton																	
Jill Kerr	Nelson Bay			✓														
Carmel Vecchio	Hargraves	✓	✓	✓			✓										✓	
Axel Ainsworth	Portland	✓		✓			✓											
Garry Cook																		
Luigi Frabcesco Genua	Woolwich																	
Ben Ewald																		
Sally Woods	Hargraves																	
Name Withheld																		
Name Withheld																		

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project	
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti- Slavery (Section 4.3.5.2)	(Section 2.1.3.2)	
Chris Theocharous	Hargraves			✓					✓		✓					
Name Withheld	Leeton					✓			✓							
Jeanine Bird	Leeton					✓										
Name Withheld	Guyra					✓		✓								
Name Withheld	Lake Albert					✓										
Name Withheld	Hargraves							✓			✓					
Sally Edwards	Tambar Springs			✓				✓			✓					
Justine & Todd Clarke	Valley Heights				✓											
Shelley Tunbridge	Yarrabin			✓							✓					
Jonathon Martin	Dunedoo															
Anna Ferguson	Bootawa					✓										

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Name Withheld	Coolah					✓									
John McBratney	VIC					✓								✓	
Name Withheld	Koorungal					✓								✓	
Natalie Coleman	Warriewood					✓								✓	
David Landini	Wakool					✓									
Anne Bowman	Dunedoo		✓			✓									
Emma Bowman	Dunedoo				✓										
Name Withheld	Weetabila												✓		
Name Withheld	Binnaway					✓									
Name Withheld	Binnaway														
Name Withheld	Binnaway														
Name Withheld	Neilrex														
Name Withheld	Binnaway					✓									
Name Withheld	VIC			✓											
Name Withheld	Binnaway														
Name Withheld	Binnaway														
Name Withheld	Binnaway					✓									
Name Withheld	Mollyan	✓													
Name Withheld	Coonabarabran														
Name Withheld	Coonabarabran														
Name Withheld	Mendooran														
Name Withheld	Mendooran														
Name Withheld	Mollyan														
Frances Bowman	Tambar Springs				✓						✓				
Name Withheld	Hargraves		✓												
Name Withheld	Hargraves		✓												
Ruth Withers	Uabry					✓									
Warren & Jane Coates	Hargraves	✓	✓					✓							
John Angelico	VIC														
Name Withheld	Ryde														

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Name Withheld	Yarrabin					✓									
Steven White	Uabry					✓									
Stan Moore	Gundary			✓											
Eleanor Hanrahan	Balmain														
Name Withheld	Yarrabin					✓									
Name Withheld	Wahroonga														
Name Withheld	Weetabila														
Name Withheld - C															
Krystle Rheinberger	Yarrabin										✓	✓			
Name Withheld	West Pennant Hills														
Phillip Brown	Young														
Michaela Primmer	Grattai														
Suzie Coric	Yarrabin														
Name Withheld	Hargraves											✓			
Gemma Pride	Yarrabin										✓				
Name Withheld	Warrawee					✓	✓								
Name Withheld	Kilarney Vale														
Name Withheld	Coffs Harbour														
Name Withheld	Dunedoo					✓									
Nicholas Maynard	Greenwich														
Name Withheld	Hargraves										✓				
Karl Coates	Terrey Hills														
Monica Christensen	Mosman														
Name Withheld	Allambie Heights														
Gabby Hodginson	Dubbo					✓									
Name Withheld	Rouse Hill		✓												
Marian Panetta	Dubbo			✓											
Name Withheld	Wahroonga														
Name Withheld	Portland														
Name Withheld	Galston					✓									

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Eddie de Wet	Tweed Heads														
Anne Green	QLD		✓			✓								✓	
Kellie Beard	Manly														
Jacqueline Coates	Hargraves														
Samantha Ledgerwood	QLD														
Nathan Coates	Hargraves			✓								✓			
Ben Harmer	Illawong			✓											
Darren Harrtus	Twelve Mile						✓								
Name Withheld	Yarrabin						✓				✓				
Name Withheld	Redfern														
Tim Pace	Forrestville					✓	✓								
Name Withheld	Worlds End		✓	✓							✓				
Name Withheld	Forrestville					✓									
Name Withheld	Greystenes														
Martin Fogarty	Cammeray														
Name Withheld	Manly					✓									
Ross Pride	Yarrabin		✓		✓										
Name Withheld	Mudgee														
Name Withheld	Arcadia					✓									
Name Withheld	Mount Knowles														
Name Withheld	Arcadia														
Name Withheld	Dee Why					✓									
Name Withheld	Avoca Beach					✓									
Name Withheld	Brooklyn														
Name Withheld	Bexley										✓				
Name Withheld	Collaroy					✓									
Pierre La Bas	Palm Beach														
Name Withheld	Maysfield West					✓									
Amber Pederson	Yarrabin		✓												
Name Withheld	Neutral Bay							✓							

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Greg Pace	Fitzroy Falls														
Name Withheld	Old Toongabbie					✓									
Name Withheld	Drummoyne								✓						
Name Withheld	Boat Harbour								✓						
Nicole Shepherd	Balgowlah		✓												
Grant Piper	Coolah														
Name Withheld	Coolah								✓		✓				
Jillian Lovelace	Emu Plains		✓												
David Marks	Cronulla	1		✓		✓	✓		✓		✓	✓			
Troy Green	Yarrabin		✓												
Name Withheld	Paddington														
Name Withheld	Drummoyne														
Veronica Lovelace	North Curl Curl		✓												
Caoimbe Lalor	Narrabeen														
Janet Norton	Armidale					✓									
Brylee Blu	Woy Woy														
Larimar Blu	Woy Woy														
Name Withheld	North Narrabeen														
Name Withheld	Coolah								✓						
Name Withheld	Coolah					✓			✓		✓				
Name Withheld - C															
Name Withheld	ACT														
Name Withheld	Burleigh Heads					✓									
Name Withheld	Worlds End														
Annette Piper	Coolah		✓		✓										
Ben Heat	Narrabri														
Ajay Correra	Yarrabin								✓		✓				
Brian Walsh	Illawong		✓												
Nicole Rossetto	Burundulla					✓			✓						
Name Withheld	Long Jetty		✓						✓						

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Paul Gregg	Twelve Mile														
Stephen Lowe	Yarrabin	✓				✓					✓				
Zoe Boyce	Dunedoo														
Name Withheld	Elanora Heights								✓						
Sophie Homan	Elanora Heights														
Caroline Homan	Elanora Heights		✓						✓						
Name Withheld	Drummoyne					✓					✓				
Name Withheld	Maitland Bar					✓									
Name Withheld	Drummoyne	✓	✓								✓				
Vanessa Parish	Narrabri														
Brendan Greenback	Bootawa														
Name Withheld	Bexley		✓						✓		✓				
Name Withheld	Mudgee														
Name Withheld	VIC					✓									
Name Withheld	Mudgee														
Jill Baggett	Mudgee														
Name Withheld	Killarney Vale		✓												
Sally-Anne Kears	Cullenbone					✓		✓	✓						
Name Withheld	Mudgee														
Name Withheld	Yarrabin		✓			✓	✓		✓		✓				
Terrence Conn	Yarrabin					✓					✓				
Margaret Conn	Yarrabin										✓				
Paul Tannous	Hargraves		✓			1			✓						
Dave Pederson	North Narrabeen								✓						
Liv Pederson	Boat Harbour														
George Papdopoles	Kellys Plains														
Name Withheld	Yarrabin			✓					✓		✓				
Name Withheld	Dee Why					✓									
Grant Robinson	One Mile							✓							
Dianne Norris	Elanora Heights														

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Name Withheld	Olinda					✓			✓						
Vanessa Riley	Mudgee														
Cam Tunbridge	Blue Haven														
Name Withheld	Gulgong			✓			✓								
Name Withheld	Gulgong					✓			✓						
Sasha McNaughton	Freshwater														
Name Withheld	Yarrabin		✓					✓	✓		✓				
Name Withheld	Mudgee		✓												
Sam Bugge	Cobram														
Greg Pogson	Mollymook Beach														
Daniel Wright	Matraville					✓									
Name Withheld	Mosman		✓												
Name Withheld	Cattai			✓											
Name Withheld	Cattai			✓											
Kerry Missingham	Gorokan		✓	✓					✓						
Janita Kinsey	Trangie					✓								✓	
Name Withheld	Matraville														
Justin Gard	Hargraves					✓	✓					✓			
Name Withheld	Wallaga Lake														
Name Withheld	Avalon			✓											
Hugh Taylor	Worlds End			✓		✓	✓		✓		✓	✓			
Name Withheld	Queenscliff			✓											
Jason Sestic	Woollahra			✓											
Richard Tunbridge	Yarrabin														
Catherine Bowman	Dunedoo					✓			✓						
Name Withheld	Warriewood														
Bryxe Statis	Collaroy														
Diane Statis	Collaroy														
Sarsha Sherriff	Fannie Bay														
Tenille Kerin	Charlestown														

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
David Mills	Newport														
Name Withheld	Greenwich			✓											
Regina Mills	Newport														
Name Withheld	Boat Harbour														
Name Withheld	Greenwich							✓							
Name Withheld	Far Meadow		✓					✓	✓						
Gregory Towley	Far Meadow		✓						✓						
Nat Barton	Wellington		✓		1	✓					✓	✓			
David Bowman	Dunedoo					✓		✓							
Name Withheld	Drummoyne														
Name Withheld	Hargraves		✓												
Lenka Vala	Swansea					✓									
Name Withheld	Mudgee					✓		✓							
Greg Pride	Mona Vale														
Name Withheld	VIC							✓							
Name Withheld	Balgowlah					✓		✓							
Name Withheld	Mollyan					✓		✓							
Name Withheld	Mollyan					✓		✓							
Ian McDonald	Walcha														
Name Withheld	Mudgee			✓	✓										
Name Withheld	Piambong				✓										
Name Withheld	Lake Cargelligo					✓									
Name Withheld	Piambong		✓		✓										
Steven Cadd	Yarrabin							✓							
Errol Edwards - C															
Rick Campbell	Beryl					✓									
Name Withheld	Illawong					✓									
Name Withheld	Yarrabin		✓								✓				
Ben Rouse	QLD														
Clare Button	Yarrabin										✓				

Name	Location	Economic, environmental, and social impacts of the Project				Justification of the Project		The Project			Procedural Matters		Issues Beyond the Scope		Supporting the Project
		Shadow Flicker (Section 4.3.1.17)	Property Values (Section 4.3.1.18)	Decommissioning (Section 4.3.1.19)	Cumulative Impacts (Section 4.3.1.20)	Renewable Energy (Section 4.3.2.1)	Climate Change (Section 4.3.2.2)	Location (Section 4.3.3.1)	Proponent (Section 4.3.3.2)	Project (Section 4.3.3.3)	Consultation (Section 4.3.4.1)	Compensation (Section 4.3.4.1)	Insurance (Section 4.3.5.1)	Anti-Slavery (Section 4.3.5.2)	(Section 2.1.3.2)
Name Withheld	Waverton						✓								
Jill Kerr	Nelson Bay					✓		✓							
Carmel Vecchio	Hargraves										✓	✓			
Axel Ainsworth	Portland														
Garry Cook															✓
Luigi Frabcesco Genua	Woolwich														✓
Ben Ewald															✓
Sally Woods	Hargraves														✓
Name Withheld															✓
Name Withheld															✓

