



# Keri Keri Wind Farm

Amendment Report

PREPARED FOR



DATE  
16 January 2026

REFERENCE  
0617753



## DOCUMENT DETAILS

DOCUMENT TITLE	Keri Keri Wind Farm
DOCUMENT SUBTITLE	Amendment Report
PROJECT NUMBER	0617753
DATE	16 January 2026
VERSION	01
AUTHOR	M. Kim, M. Coles, A. Martire da Silva, R. Todaro, N. Smith, J. Clement, R. Benson, D. Wilson
CLIENT NAME	Accionia Energia Pty Ltd

## DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
1	01	M. Kim M. Coles A. Martire da Silva R. Todaro N. Smith	M. Davey	M. Davey	17.12.2025	Draft
1	02	N. Smith	L. Baker	L. Baker	9.01.2025	Draft
1	03	N. Smith	M. Davey	M. Davey	16.01.2025	Final

# Keri Keri Wind Farm

## Amendment Report

0617753



---

**Rosetta Todaro**

Consultant



---

**Martin Kim**

Senior Consultant



---

**Natasha Smith**

Consultant



---

**Tom Parry**

Principal Consultant / Project Manager



---

**Mark Davey**

Partner

Environmental Resources Management  
Australia Pty Ltd  
Level 14, 207 Kent Street  
Sydney NSW 2000

## CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	3
1.1 BACKGROUND	3
1.2 ORIGINAL PROJECT	3
1.3 AMENDED PROJECT	4
1.4 THE APPLICANT	9
2. STRATEGIC CONTEXT	14
2.1 STRATEGIC FRAMEWORK	14
2.2 SITE SETTING	17
3. DESCRIPTION OF THE AMENDMENTS	18
4. STATUATORY CONTEXT	22
5. ENGAGEMENT	23
5.1 REGULATOR ENGAGEMENT	23
5.2 COMMUNITY AND STAKEHOLDER ENGAGEMENT	23
6. ASSESSMENT OF IMPACTS	28
6.1 BIODIVERSITY	32
6.1.1 Background	32
6.1.2 Impact Assessment	32
6.1.3 Updated Mitigation and Management	35
6.2 ABORIGINAL CULTURAL HERITAGE	45
6.2.1 Background	45
6.2.2 Impact Assessment	45
6.2.3 Updated Mitigation and Management	47
6.3 NOISE AND VIBRATION	48
6.3.1 Background	48
6.3.2 Impact Assessment	48
6.3.3 Updated Mitigation And Management	50
6.4 TRAFFIC AND TRANSPORT	52
6.4.1 Background	52
6.4.2 Impact Assessment	52
6.4.3 Updated Mitigation and Management	56
6.5 LANDSCAPE AND VISUAL	57
6.5.1 Background	57
6.5.2 Impact Assessment	57
6.5.3 Updated Mitigation and Management	59
6.6 AVIATION	61
6.6.1 Background	61
6.6.2 Impact Assessment	61
6.6.3 Updated Mitigation and Management	63
6.7 TELECOMMUNICATIONS AND ELECTROMAGNETIC INTERFERENCE	64
6.7.1 Background	64
6.7.2 Impact Assessment	64

6.7.3	Updated Mitigation and Management	64
6.8	WATER	66
6.8.1	Background	66
6.8.2	Impact Assessment	66
6.8.3	Updated Mitigation and Management	67
6.9	LAND AND AGRICULTURE	70
6.9.1	Background	70
6.9.2	Impact Assessment	70
6.9.3	Updated Mitigation and Management	71
6.10	PRELIMINARY HAZARDS ANALYSIS	71
6.10.1	Background	71
6.10.2	Impact Assessment	71
6.10.3	Updated Mitigation and Management	72
6.11	ECONOMIC	73
6.11.1	Background	73
6.11.2	Impact Assessment	73
6.11.3	Updated Mitigation and Management	74
6.12	PRELIMINARY SITE INVESTIGATION	75
6.12.1	Background	75
6.12.2	Impact Assessment	75
6.12.3	Updated Mitigation and Management	77
6.13	CUMULATIVE IMPACTS	78
6.13.1	Background	78
6.13.2	Impact Assessment	78
6.13.3	Updated Mitigation and Management	78
<b>7.</b>	<b>JUSTIFICATION</b>	<b>87</b>
7.1	PROJECT EVALUATION	87
7.1.1	Consistency with Strategic Context	87
7.1.2	Consistency with Community Views	88
7.1.3	Consistency with Agency Views	88
7.1.4	Actions Taken to Further Avoid or Minimise Impacts	89
<b>8.</b>	<b>REFERENCES</b>	<b>94</b>
<hr/>		
APPENDIX A	AMENDED PROJECT DESCRIPTION	
APPENDIX B	UPDATED MITIGATION AND MANAGEMENT MEASURES	
APPENDIX C	UPDATED STATUTORY COMPLIANCE TABLE	
APPENDIX D	AMENDED BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT	
APPENDIX E	AMENDED ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT	
APPENDIX F	ADDENDUM LANDSCAPE AND VISUAL IMPACT ASSESSMENT	
APPENDIX G	AMENDED NOISE AND VIBRATION IMPACT ASSESSMENT	
APPENDIX H	ADDENDUM TO THE FLOOD IMPACT ASSESSMENT	
APPENDIX I	AMENDED TRAFFIC AND TRANSPORT IMPACT ASSESSMENT	
APPENDIX J	AMENDED AVIATION IMPACT ASSESSMENT	
APPENDIX K	AMENDED TELECOMMUNICATIONS AND EMI ASSESSMENT	
APPENDIX L	AMENDED AGRICULTURAL IMPACT ASSESSMENT	
APPENDIX M	RESPONSE TO DPHI ON KERI KERI PHA RFI (J-000887-TN-01-REV B)	

APPENDIX N	UPDATED ECONOMIC ASSESSMENT
APPENDIX O	PRELIMINARY SITE INVESTIGATION
APPENDIX P	TRANSPORT ROUTE - ABORIGINAL CULTURAL HERITAGE DUE DILIGENCE
APPENDIX Q	COMMENT ON CONNECTION OPTIONS
APPENDIX R	VOLUNTARY PLANNING AGREEMENT LETTER

## LIST OF TABLES

TABLE 1-1	ENVIRONMENTAL, SOCIAL AND ECONOMIC BENEFITS OF THE AMENDED PROJECT	6
TABLE 3-1	AMENDED PROJECT KEY CHANGES	19
TABLE 5-1	REGULATOR ENGAGEMENT OVERVIEW	23
TABLE 5-2	COMMUNITY AND STAKEHOLDER ENGAGEMENT OVERVIEW	24
TABLE 6-1	IMPACTS ON YANGA STATE CONSERVATION AREA	29
TABLE 6-2	SURVEYS COMPLETED SINCE EXHIBITION OF THE EIS	32
TABLE 6-3	IMPACTS THAT REQUIRE AN OFFSET – ECOSYSTEM CREDITS	33
TABLE 6-4	IMPACTS THAT REQUIRE AND OFFSET – SPECIES CREDITS	34
TABLE 6-5	REQUIRED DRIVER SIGHT DISTANCE AT SITE ACCESSES	53
TABLE 6-6	ANNUAL ECONOMIC IMPACTS ASSOCIATED WITH CONSTRUCTION	74
TABLE 6-7	ANNUAL ECONOMIC IMPACTS ASSOCIATED WITH OPERATION	74
TABLE 6-8	AREAS OF ENVIRONMENTAL CONCERN (AEC)	76
TABLE 6-9	RELATIVE LEVEL OF RISK OF CONTAMINATION	77
TABLE 6-10	MITIGATION MEASURES – CONTAMINATION	77
TABLE 6-11	RELEVANT FUTURE PROJECTS TO CONSIDER FOR CUMULATIVE IMPACTS	80
TABLE 7-1	SUMMARY OF UPDATED EVALUATION OF THE AMENDED PROJECT	91

## LIST OF FIGURES

FIGURE 1-1	REGIONAL LOCALITY	11
FIGURE 1-2	ENVIRONMENTAL IMPACT STATEMENT PROJECT LAYOUT	12
FIGURE 1-3	AMENDED PROJECT LAYOUT	13
FIGURE 2-1	NEM GENERATION MIX 2009-2049 (AEMO 2024)	15
FIGURE 6-1	VEGETATION ZONES WITHIN THE SUBJECT LAND	36
FIGURE 6-2	REVISED PREDICTED WIND TURBINE OPERATIONAL NOISE CONTOURS	51
FIGURE 6-3	TRANSPORT ROUTE – NSW/VIC BORDER TO PROJECT	55
FIGURE 6-4	REVISED SHADOW FLICKER ASSESSMENT	60
FIGURE 6-5	DEVELOPED CASE - PMF WITH REGIONAL INFLOWS PEAK FLOOD DEPTH AND LEVEL	68
FIGURE 6-6	FLOOD IMPACTS - 5% AEP EVENT	69
FIGURE 6-7	NEARBY RENEWABLE ENERGY PROJECTS	79

## ACRONYMS AND ABBREVIATIONS

Acronym	Description
AAR	Aboriginal Ancestral Remains
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHMP	Aboriginal Cultural Heritage Management Plan
ACMA	Australian Communications and Media Authority
AEC	Areas of Environmental Concern
AEMO	Australian Energy Market Operator
ACHDDA	Aboriginal Heritage Due Diligence Assessment
AIA	Aviation Impact Assessment
APZ	Asset Protection Zone
BAM	Biodiversity Assessment Method
BBAMP	Bird and Bat Aviation Management Plan
BCS	Biodiversity Conservation Science Directorate
BDAR	Biodiversity Development Assessment Report
BUS	Bird utilisation surveys
CASA	Civil Aviation Safety Authority
CSM	Conceptual Site Model
DPHI	Department of Planning, Housing and Infrastructure
DPE	Department of Planning
EIS	Environmental Impact Statement
EMI	Electromagnetic Interference
ERM	Environmental Resources Management
ESOO	Electricity Statement of Opportunities
EP&A Act	Environmental Planning & Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
FRNSW	Fire and Rescue NSW
FTE	Full Time Equivalent
GW	Gigawatt
GWh	Giga-watt hours
kV	Kilovolt
LGA	Local Government Area
LVIA	Landscape and Visual Impact Assessment
MW	Megawatts
MWh	Megawatt hour
NEM	National Electricity Market

<b>Acronym</b>	<b>Description</b>
NPI	Noise Policy for Industry
NPWS	NSW National Parks and Wildlife Services
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OSOM	Oversize Overmass
PCT	Plant Community Type
PNTL	Project noise trigger levels
PSI	Preliminary Site Investigation
RAP	Registered Aboriginal Parties
REZ	Renewable Energy Zone
RFS	Rural Fire Services
SA	South Australia
SAII	Serious and irreversible impact
SCA	State Conservation Area
SES	NSW State Emergency Service
SSD	State Significant Development
SSR	Secondary Surveillance Radar
TECs	Threatened ecological communities
TfNSW	Transport for New South Wales
UNFCCC	United Nations Framework Convention on Climate Change Conference
VIS	Vegetation Integrity Scores
VZ	Vegetation Zone
WTG	Wind Turbine Generator

## EXECUTIVE SUMMARY

Acciona Energia Australia Global Pty Ltd. ('Acciona' or the 'Applicant') is progressing development of the Keri Keri Wind Farm (the Project), located in the rural locality of Keri Keri, NSW.

The Project is classified as State Significant Development (SSD) and, therefore, approval is required under Part 4, Division 4.7 of the *Environmental Planning & Assessment Act 1979* (EP&A Act). In accordance with the requirements of Part 4, Division 4.7 of the EP&A Act, the Applicant prepared an Environmental Impact Statement (EIS) to assess potential impacts that may result from the construction, operation and decommissioning of the Project. The EIS was put on public exhibition in 2024.

Submissions made during public exhibition, along with environmental and social constraints and constructability considerations have resulted in the Project being amended to that which was presented in the EIS. Amendments of note include the removal of 41 wind turbine generators (WTGs), a change in the location of 63 WTGs, removal of two site access points, and change in the location of ancillary infrastructure.

The amended Project has significantly reduced the potential for impacts on environmental and social aspects, specifically:

- A significant reduction in potential impacts to Aboriginal cultural heritage sites, specifically:
  - A reduction in the number of sites that may be directly impacted from 13 to one (an isolated artefact);
  - A reduction in the number of sites within the micro-siting corridor from 74 to 23;
- A significant reduction in impacts to biodiversity values, specifically:
  - Confirmation that no species at risk of serious and irreversible impact (SAII) would be subject to impacts from the Project;
  - Elimination of assumed presence through completion of appropriately timed targeted surveys, i.e., Mossgiel Daisy (*Brachyscome papillosa*), Chariot Wheels (*Maireana cheelii*), Slender Darling-pea (*Swainsona murrayana*);
  - Elimination of impacts to the following species credit species:
    - Slender Darling Pea (*Swainsona murrayana*);
    - Little Eagle (*Hieraaetus morphnoides*);
  - Elimination of impacts to PCT 26, PCT 44, PCT 160 and associated threatened species (i.e., these no longer occur in the Disturbance Footprint);
  - Reduced impacts (i.e., clearing) to PCT 164 by 206.31 ha;
  - Reduced impacts (i.e., clearing) to PCT 163 by 153.11 ha;
  - Reduction in the number of ecosystem offset credits by 44% (18,048 credits);
  - Reduction in the number of species offset credits by 94% (118,153 credits);
- Reduced amenity impacts (i.e., visual and noise) due to the removal of 41 WTGs, micro-siting of 57 WTGs, and relocation of 6 WTGs;

- Reduced traffic and transport impacts including:
  - A significant reduction in the number of heavy vehicle and OSOM movements;
  - Removal of the Port of Newcastle as a transport route option; and
- Reduced impacts to agricultural productivity due to the reduction in the area that will be disturbed by the Project.

As necessary, mitigation measures have been updated to ensure potential impacts are appropriately managed and mitigated (Appendix B). The updated mitigation measures provide further rigour to mitigation strategies and improve the viability of the Project.

# 1. INTRODUCTION

## 1.1 BACKGROUND

Acciona Energia Australia Global Pty Ltd. ('Acciona' or the 'Applicant') proposes to construct, operate and decommission the Keri Keri Wind Farm (the 'Project'), within the rural locality of Keri Keri, New South Wales (NSW). The regional context is shown in Figure 1-1.

The Applicant is seeking State Significant Development (SSD) consent for the Project under Part 4, Division 4.7 of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

The Project was determined to be a controlled action on 2 May 2022 and approval is also sought under Part 9 of *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Referral (EPBC Ref: 2022/9176).

In support of the SSD application (SSD - 38358962), an Environmental Impact Statement (EIS) was prepared for the Project (ERM, 2024). The EIS was publicly exhibited between 24 May 2024 and 20 June 2024 by the NSW Department of Planning, Housing and Infrastructure (DPHI).

During exhibition, 53 submissions relating to the Project EIS were received from government agencies, council, special interest groups and the public. However, four submissions were deemed duplicates and, therefore, 49 submissions have been considered in the Submissions Report (ERM, 2025).

Since exhibition of the EIS, the Applicant has amended the Project in response to submissions received, to further avoid and minimise impacts, to optimize constructability, and with consideration of the outcomes of engagement with government agencies, the community and other stakeholders.

This Amendment Report assesses the potential impacts associated with the Project's improved design and as required, provides additional recommendations for mitigation measures. The Amendment Report covers all the improvements made between exhibition of the EIS and the Response to Submissions stage. The Amendment Report has been prepared in accordance with the 'State Significant Development Guidelines – Preparing an Amendment Report' (NSW DPIE, 2022) and should be read in conjunction with the Submissions Report (ERM, 2025).

The key objectives of the Amendment Report are to:

- Describe the proposed amendments made to the Project in response to issues raised in public submissions and by government agencies, council and other stakeholders;
- Assess the environmental, social and economic impacts of the amended Project; and
- Help the community, landowners, government agencies, councils and the consent authority better understand the Project amendments and their potential impacts.

## 1.2 ORIGINAL PROJECT

The Project as presented in the EIS (the 'EIS Project layout') comprised the construction, operation and decommissioning (where applicable) of a wind farm, with up to 155 wind turbine generators (WTGs), and associated and ancillary infrastructure.

The key components of the Project as presented in the EIS included:

- Up to 155 WTGs with a maximum tip height of 291.5 metres (m), hub height of 200 m and blade length of 91.5 m;
- Three 33/330 kilovolt (kV) electrical substations;
- One switching station;
- A lithium-ion battery energy storage system (BESS) with a rated capacity of 200 Megawatt (MW) / 800 MW-hour (MWh);
- Underground and overhead 33 kV electrical reticulation and fibre optic cabling connecting the WTGs to the onsite substations (designed to follow access tracks where possible);
- A 330 kV overhead transmission line;
- Four site access points and an internal private access road network (combined total length of about 148.3 kilometres (km));
- Three operations and maintenance (O&M) facilities;
- Commissioning of four permanent meteorological monitoring masts (met masts) for power testing;
- Decommissioning of four temporary met masts;
- Upgrades of external roads and intersections to facilitate the transport and delivery of WTG components and associated infrastructure;
- Other ancillary infrastructure including security huts, biosecurity wash bays; and
- Temporary facilities such as concrete batching plants, hardstands and laydown areas, construction compounds, and workers accommodation.

The EIS Project layout is shown in Figure 1-2.

### 1.3 AMENDED PROJECT

Since exhibition of the EIS, the Applicant has made amendments to the Project to:

- Further avoid and/or minimise adverse environmental impacts;
- Protect sensitive areas and receivers identified through specialist assessments including biodiversity, heritage, visual, hazards and risks;
- Address matters raised in submissions and the outcomes of ongoing engagement with the community, landowners, government agencies, local council and other stakeholders;
- Maximise the yield of wind power generation through optimising the position of WTGs on-site and in consideration of heritage and environmental constraints; and
- Maintain minimum Project generation capacity to achieve commercial viability of the Project in the context of the cost required to connect to the existing electrical grid.

Specifically, the amendments include:

- Revision of the Project Area to remove two site access points;
- Removal of 41 WTGs;
- Micro-siting (moved <100 m) of 57 WTGs;
- Relocation (moved >100m) of 6 WTGs;

- Optimisation of electrical reticulation, including:
  - Eliminating 64.5 km of 33 kV overhead transmission;
  - Increase in the length of 33 kV underground transmission by 20.3 km;
  - Decrease in the length of 330 kV overhead transmission by 3.79 km;
  - Additional 220 kV or 330 kV transmission line (Switching Station to proposed connection point) by 0.7 km
- Reduction in the number of O&M facilities, from three to one;
- Reduction in the number of security huts, from four to two;
- Optimisation of internal access tracks, which has reduced the total length by 31.8 km (from 148.3 km to 116.5 km);
- Micro-siting (moved <100 m) of ancillary infrastructure including:
  - Three 33/330 kV substations;
  - 200 MW/800 MWh BESS;
- Reduction in the number of biosecurity wash bays from four to two (aligned with the reduction in site access points);
- Removal of the borrow pit;
- Removal of the option to use Port of Newcastle as a port of import, and associated transport route from the Port of Newcastle to site;
- Micro-siting (moved <100 m) of temporary infrastructure, including:
  - Worker accommodation camp;
  - Concrete batching plants;
  - Laydown areas;
  - Carparks;
  - Construction compounds;
- Reduction in the number of permanent meteorological masts, from four to three; and
- Reduction in the number of temporary meteorological masts, from four to three.

The amended Project provides significant environmental, social and economic benefits as outlined in Table 1-1.

**TABLE 1-1 ENVIRONMENTAL, SOCIAL AND ECONOMIC BENEFITS OF THE AMENDED PROJECT**

Aspect	Proposed Amendments	Benefits of Amendments
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>• Reduction in number of WTGs from 155 to 114;</li> <li>• Relocation and micro-siting of WTGs;</li> <li>• Reduction in extent of underground electrical reticulation and other power infrastructure;</li> <li>• Reduction in number of site access points and biosecurity wash bays to two;</li> <li>• Reduction in extent of site access tracks;</li> <li>• Reduction in number of permanent met masts to three; and,</li> <li>• Removal of proposed Port of Newcastle site access route reducing need for external road works.</li> </ul>	<p>The amended Project has led to further significant avoidance of impacts to native vegetation and threatened species and communities, including Serious and Irreversible Impacts (SAII) entities, as outlined in Section 6.1 and Appendix D Specifically, the amended Project has:</p> <ul style="list-style-type: none"> <li>• Avoided a further 366.07 ha of native vegetation by eliminating any impacts to Plant Community Type (PCT) 26, PCT 44 and PCT 160;</li> <li>• Reduced ecosystem offset credit liability by 44% (18,354 credits);</li> <li>• Avoided threatened species and threatened species' habitat, including: <ul style="list-style-type: none"> <li>◦ Fully avoided impacts to the Slender Darling-pea (<i>Swainsona murrayana</i>) and Little Eagle (<i>Hieraaetus morphnoides</i>);</li> <li>◦ Significantly reduced the potential for impacts to habitat associated with the Mossgiel Daisy (<i>Brachyscome papillosa</i>) and Chariot Wheels (<i>Maireana cheelii</i>), reduced by 86% and 97% respectively; and</li> </ul> </li> <li>• Commensurately, the species offset credit liability has reduced by 94% (118,153 credits).</li> </ul>
<b>Aboriginal Cultural heritage</b>	<ul style="list-style-type: none"> <li>• Reduction of the temporary Disturbance Footprint from 1,137 hectares (ha) to up to 764 ha;</li> <li>• Revised Project Area to remove two site access points;</li> <li>• Removal of 41 WTGs;</li> <li>• Micro-siting (moved &lt;100 m) of 57 WTGs;</li> <li>• Relocation (moved &gt;100m) of 6 WTGs; and</li> <li>• Change of location and revision of numbers for the ancillary infrastructure such as the BESS and substations.</li> </ul>	<p>The amended Project has resulted in a reduction in impacts on Aboriginal cultural heritage as outlined in Section 6.2 and Appendix E. Specifically:</p> <ul style="list-style-type: none"> <li>• the number of identified sites that may be subject to direct impacts has been reduced by 92% (from 13 to one (KK-046, an isolated artefact)); and</li> <li>• Similarly, the number of sites within the micro-siting corridor that may be subject to potential impact has reduced by 69% (from 74 to 23).</li> </ul> <p>This reflects a focus by the Applicant to avoid or minimise impacts on Aboriginal cultural heritage when amending the Project layout.</p>

Aspect	Proposed Amendments	Benefits of Amendments
<b>Noise</b>	<ul style="list-style-type: none"> <li>Reduction of WTGs from 155 to 114; and</li> <li>Micro-siting of 57 WTGs and relocation of six WTGs to increase the distance from sensitive receptors.</li> </ul>	<p>The amended Project has further reduced noise and vibration impacts, most notably by removing 41 WTGs, as outlined in Section 6.3 and Appendix G. Operation of the remaining 114 WTGs will not result in exceeding the 35 dB(A) noise threshold at any sensitive receiver. In particular, the removal and relocation of WTGs in proximity to the Yanga SCA has reduced predicted noise levels to below 16 dB(A), meeting relevant criteria with no adverse noise impacts expected.</p>
<b>Traffic and Transport</b>	<ul style="list-style-type: none"> <li>Reduced number of WTGs from up to 155 to 114 WTGs;</li> <li>Reduction in the temporary Disturbance Footprint from 1,137 ha to 764 ha;</li> <li>Reduction in the permanent Disturbance Footprint from 574 ha to 491 ha;</li> <li>Reduced construction period from an anticipated 24 months to 18 months (- 6 months);</li> <li>Reduction in the number of site access points from four to two ); and</li> <li>Removal of the Port of Newcastle.</li> </ul>	<p>The amended Project reduces traffic and transport impacts as outlined in Section 6.4 and Appendix I. Benefits of the amended Project to traffic, include:</p> <ul style="list-style-type: none"> <li>Fewer WTGs and a smaller disturbance footprint, resulting in fewer heavy vehicle (including OSOM) movements;</li> <li>A shorter construction period, reducing the duration of traffic impacts;</li> <li>Two less site access points, reducing local traffic during construction;</li> <li>Removal of the Port of Newcastle, eliminating associated upgrades along this route; and</li> <li>Only four locations along the remaining route will require upgrades for OSOM movements.</li> </ul>
<b>Landscape and Visual</b>	<ul style="list-style-type: none"> <li>Reduction in number of WTGs from 155 to 114;</li> <li>Reduction of ancillary infrastructure, e.g., number of O&amp;M facilities, met masts etc.; and</li> <li>Relocation of WTGs, ancillary infrastructure and temporary facilities.</li> </ul>	<p>The amended Project reduces the number of visible WTGs, further lowering impacts on residential dwellings and public viewpoints, as outlined in Section 6.5 and Appendix F.</p>
<b>Aviation</b>	<ul style="list-style-type: none"> <li>Reduction in the number of WTGs from 155 to 114;</li> <li>Micro-siting and relocation of WTGs;</li> <li>Optimisation of electrical reticulation; and</li> <li>Reduction in the number of met masts</li> </ul>	<p>The amended Project is mostly consistent with the EIS Project in terms of impacts to aviation, as outlined in Section 6.6 and Appendix J. Benefits of the amended Project, however, includes elimination of wake turbulence impacts on Jeraly Station.</p>

Aspect	Proposed Amendments	Benefits of Amendments
<b>Telecommunications and Electromagnetic Interference (EMI)</b>	<ul style="list-style-type: none"> <li>Reduction of WTGs from 155 to 114;</li> <li>Micro-siting / relocation of WTGs, ancillary infrastructure and temporary facilities; and</li> <li>Updated radiocommunications environment.</li> </ul>	<p>The amended Project includes the relocation of WTGs that were in proximity of three point-to-point links and associated radiocommunications towers, as outlined in Section 6.7 and Appendix K. As a result of this, no impacts on telecommunications assets or services are expected.</p>
<b>Water</b>	<ul style="list-style-type: none"> <li>Reduction of the temporary Disturbance Footprint from 1,137 ha to up to 764 ha;</li> <li>Revised Project Area to remove two site access points;</li> <li>Reduction in number of WTGs from 155 to 114;</li> <li>Reduction of ancillary infrastructure, e.g., number of O&amp;M facilities, met masts etc.; and</li> <li>Relocation of WTGs, ancillary infrastructure and temporary facilities.</li> </ul>	<p>The amended Project is mostly consistent with the EIS Project in terms of impacts to local hydrology and flooding, as outlined in Section 6.8 and Appendix H. The amended Project is still considered to be non-detrimental in terms of potential flood impacts.</p>
<b>Land and Agriculture</b>	<ul style="list-style-type: none"> <li>Reduction in the number of WTGs from 155 to 114;</li> <li>Reduction in the temporary Disturbance Footprint from 1,137 ha to 764 ha;</li> <li>Reduction in the permanent Disturbance Footprint from 574 ha to 491 ha; and</li> <li>Reduction in construction period from 24 months to 18 months.</li> </ul>	<p>The main benefit of the amended Project on agricultural impacts, is the reduction in the disturbance footprint, which has reduced the area of agricultural land that will be impacted, reducing impacts to agricultural productivity, as outlined in Section 6.9 and Appendix L.</p> <p>Other benefits to agricultural impacts from the amended Project, include:</p> <ul style="list-style-type: none"> <li>Reducing the potential loss of agricultural income during construction from about \$950,000 (over 24 months) to about \$532,000 (over 18 months); and</li> <li>Reducing the loss of agricultural income during operations from \$9,000 per annum to about \$5,000 per annum.</li> </ul> <p>Although impacts were considered negligible within the EIS, the amended Project layout has further reduced any potential impacts to land, soil and agricultural productivity on a regional scale.</p>

Aspect	Proposed Amendments	Benefits of Amendments
<b>Hazards</b>	<ul style="list-style-type: none"> <li>Reduction in the number of WTGs from 155 to 114; and</li> <li>Micro-siting (moved &lt;100 m) of 57 WTGs.</li> </ul>	The amended Project is mostly consistent with the EIS Project in terms of any hazards, as outlined in Section 6.10. Benefits of the amended Project, however, include reducing the number of WTGs contributing to the 10 per million per year (pmpy) risk criterion for active open space at the Willowvale rest area.
<b>Economic</b>	<ul style="list-style-type: none"> <li>Reduction in the number of WTGs from 155 to 114;</li> <li>Reduction in the temporary Disturbance Footprint from 1,137 ha to 764 ha; and</li> <li>Reduction in the permanent Disturbance Footprint from 574 ha to 491 ha.</li> </ul>	Although there is an overall reduction in the level of economic activity to be generated during the operational phase, the amended Project will still significantly contribute to the regional and NSW economies as outlined in Section 6.11 and Appendix N.
<b>Cumulative impacts</b>	<ul style="list-style-type: none"> <li>Reduction in the number of WTGs from 155 to 114;</li> <li>Reduction in the temporary Disturbance Footprint from 1,137 ha to 764 ha;</li> <li>Reduction in the permanent Disturbance Footprint from 574 ha to 491 ha; and</li> <li>Reduction in construction period from 24 months to 18 months.</li> </ul>	Since exhibition of the EIS, a further 11 projects have been identified, as outlined in Section 6.13. All relevant nearby projects have been considered throughout this assessment and accompanying technical assessments. Given the overall reduction in the scale of the amended Project compared with the EIS Project, no further cumulative impacts have been identified.

A detailed description of the amended Project is provided in Section 3. The amended Project layout is shown in Figure 1-3. An updated Project description is provided in Appendix A. An updated assessment of impacts relating to the amended Project is provided in Section 6. The assessments have been updated by ERM in-house specialists and sub-consultants. Where sub-consultants have updated assessments these are referred to as 'Updated' / 'Revised' / 'Addendum'; all other updated assessments use the generic term 'Amended'.

As necessary, additional mitigation measures have been proposed and/or previously recommended mitigation measures have been updated to ensure all potential impacts are appropriately managed. A complete list of mitigation measures for the Project is provided in Appendix B.

## 1.4 THE APPLICANT

Acciona Energy Australia Global is an Australian subsidiary of Acciona Energía, a global renewable energy company with around 13.5 gigawatts (GW) of installed capacity. Acciona Energía are headquartered in Spain and listed on the Madrid stock exchange with a market capitalisation of €7 billion.

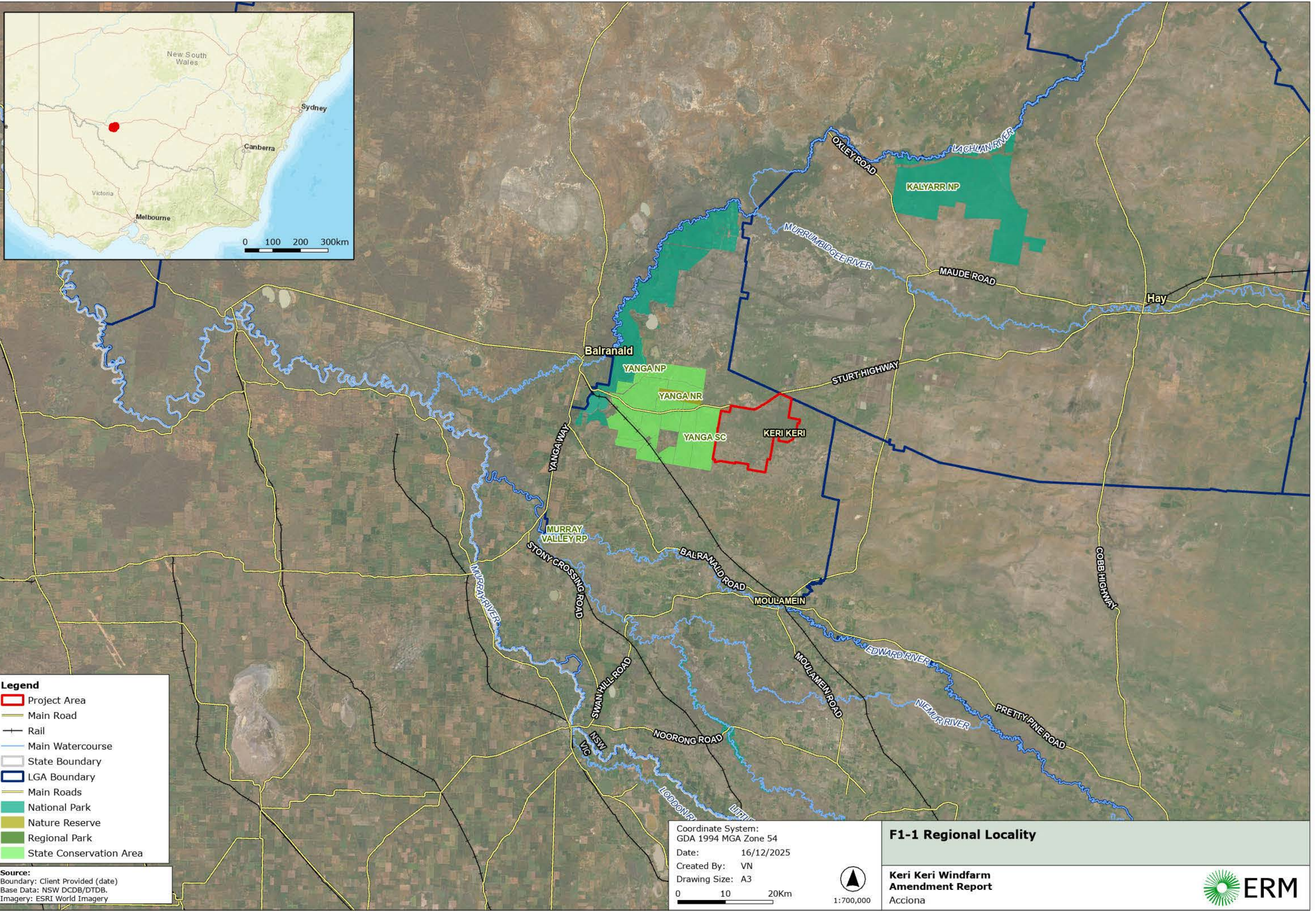
Acciona Energía is a key player in the renewable energy sector and has been carbon neutral since 2016. Since 2015, they have topped the Energy Intelligence “Top 100 Green Utilities” ranking.

Acciona Energy Australia Global established in Australia in 2002 and have invested more than A\$1.8 billion in renewable energy projects, including constructing 5 wind farms and 1 solar farm with a total installed capacity of 1 gigawatt (GW). Their Australian development portfolio includes the 923 MW McIntyre Wind Farm in Queensland, the company’s largest renewable energy facility globally. Acciona Energy Australia Global have a significant pipeline of advanced development projects, including over 2 GW of wind, solar photovoltaic, and battery energy storage.

Acciona Energy Australia Global details are as follows:

**ABN:** 54 600 910 647

**Address:** Level 3, 11 Eastern Road, South Melbourne, 3205.



- Legend**
- Project Area
  - Main Road
  - Rail
  - Main Watercourse
  - State Boundary
  - LGA Boundary
  - National Park
  - Nature Reserve
  - Regional Park
  - State Conservation Area

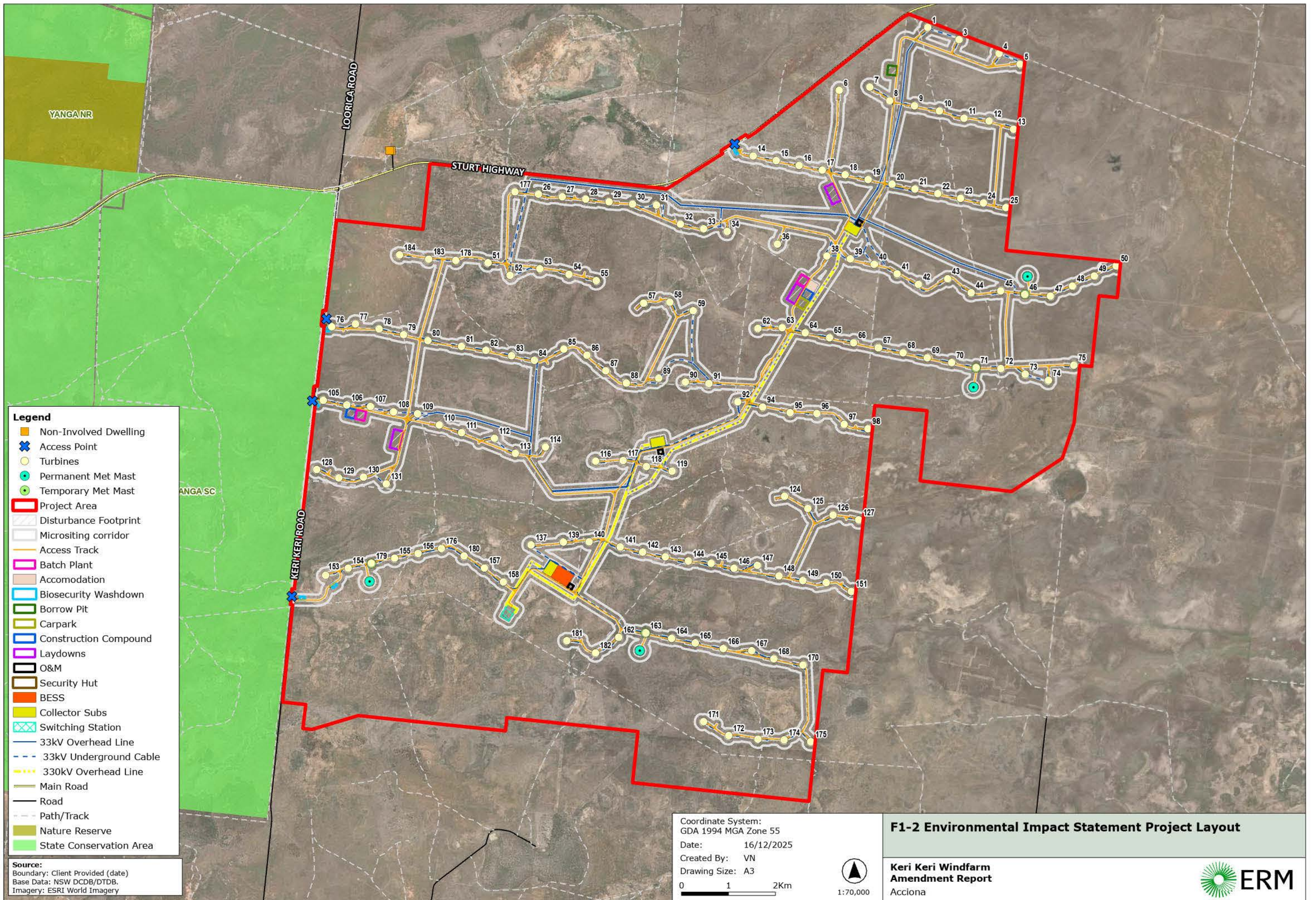
**Source:**  
 Boundary: Client Provided (date)  
 Base Data: NSW DCDB/DTDB.  
 Imagery: ESRI World Imagery

Coordinate System:  
 GDA 1994 MGA Zone 54  
 Date: 16/12/2025  
 Created By: VN  
 Drawing Size: A3  
 0 10 20km



**F1-1 Regional Locality**  
**Keri Keri Windfarm  
 Amendment Report**  
 Acciona





- Legend**
- Non-Involved Dwelling
  - Access Point
  - Turbines
  - Permanent Met Mast
  - Temporary Met Mast
  - Project Area
  - Disturbance Footprint
  - Micrositing corridor
  - Access Track
  - Batch Plant
  - Accomodation
  - Biosecurity Washdown
  - Borrow Pit
  - Carpark
  - Construction Compound
  - Laydowns
  - O&M
  - Security Hut
  - BESS
  - Collector Subs
  - Switching Station
  - 33kV Overhead Line
  - 33kV Underground Cable
  - 330kV Overhead Line
  - Main Road
  - Road
  - Path/Track
  - Nature Reserve
  - State Conservation Area

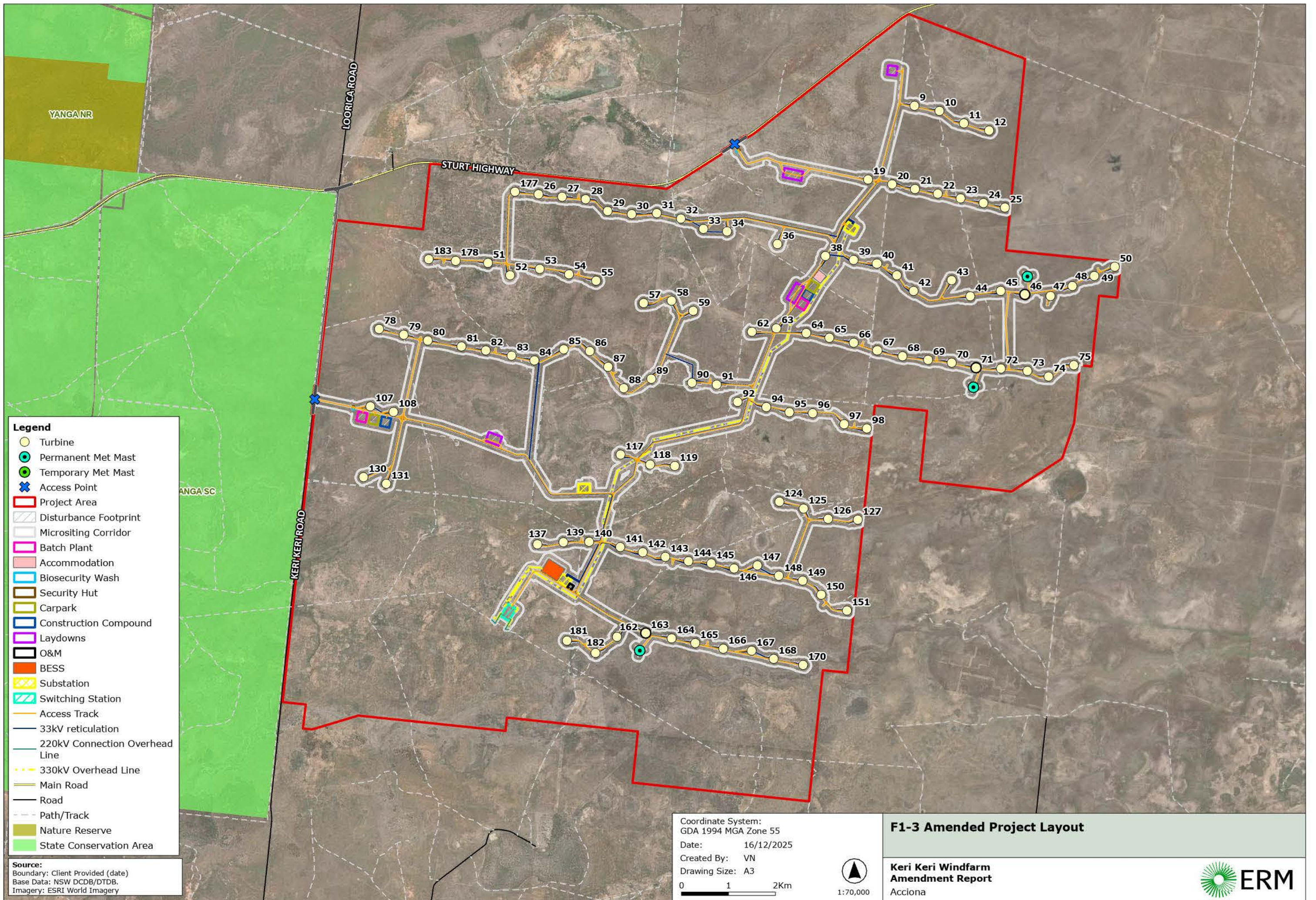
Source:  
 Boundary: Client Provided (date)  
 Base Data: NSW DCDB/DTDB.  
 Imagery: ESRI World Imagery

Coordinate System:  
 GDA 1994 MGA Zone 55  
 Date: 16/12/2025  
 Created By: VN  
 Drawing Size: A3  
 0 1 2Km  
 1:70,000

**F1-2 Environmental Impact Statement Project Layout**

**Keri Keri Windfarm  
 Amendment Report**

Acciona



- Legend**
- Turbine
  - Permanent Met Mast
  - Temporary Met Mast
  - Access Point
  - Project Area
  - Disturbance Footprint
  - Micrositing Corridor
  - Batch Plant
  - Accommodation
  - Biosecurity Wash
  - Security Hut
  - Carpark
  - Construction Compound
  - Laydowns
  - O&M
  - BESS
  - Substation
  - Switching Station
  - Access Track
  - 33kV reticulation
  - 220kV Connection Overhead Line
  - 330kV Overhead Line
  - Main Road
  - Road
  - Path/Track
  - Nature Reserve
  - State Conservation Area


**Source:**  
 Boundary: Client Provided (date)  
 Base Data: NSW DCDB/DTDB.  
 Imagery: ESRI World Imagery

Coordinate System:  
 GDA 1994 MGA Zone 55  
 Date: 16/12/2025  
 Created By: VN  
 Drawing Size: A3  
 0 1 2Km  
 1:70,000

**F1-3 Amended Project Layout**

**Keri Keri Windfarm  
 Amendment Report**

Acciona



## 2. STRATEGIC CONTEXT

### 2.1 STRATEGIC FRAMEWORK

The strategic context of the amended Project remains consistent with that described in Section 2 of the EIS (ERM, 2024). The amended Project remains aligned with current Australian Government and NSW climate change commitments and various strategies, policies, and plans across regional and local contexts, including:

- United Nations Sustainable Development Goals;
- United Nations Framework Convention on Climate Change Conference (UNFCCC) of Parties 28 (COP28), Dubai 2023;
- UNFCCC COP27, Egypt 2022, UNFCCC COP26, Glasgow 2021, UNFCCC COP21, Paris 2015;
- The Australian Government’s Renewable Energy Target;
- The Australian Government’s Powering Australia Plan
- Greenhouse gas emissions reduction targets described in the *Climate Change Act 2022*;
- NSW Net Zero Plan Stage 1: 2020-2030;
- NSW Electricity Strategy;
- NSW Transmission Infrastructure Strategy;
- NSW Electricity Infrastructure Roadmap;
- NSW South West Renewable Energy Zone;
- Contributing to the NEM;
- Riverina Murray Regional Plan;
- Murray River Local Strategic Planning Statement; and
- Murray River Community Strategic Plan 2022-2032.

Since preparation of the EIS, the Australian Energy Market Operator (AEMO) has published the 2025 Electricity Statement of Opportunities (ESOO). The ESOO provides technical and market data for the National Electricity Market (NEM) over a forecast period of 10 years from 2025-2026. The 2025 ESOO notes that Australia transition to a net zero emissions economy by 2050 continues to shape electricity consumption and demand. Key drivers of increasing demand are the rapid expansion of data centres, prospective industrial load and accelerating business electrification, and a downward revision in hydrogen production expectations.

The ESOO 2025 (AEMO, 2025) notes a 351 GW pipeline of renewable energy generation projects across the NEM in various stages of development; however, about 325 GW of this is categorised as ‘proposed’ projects that do not meet AEMO’s ‘commitment criteria’.

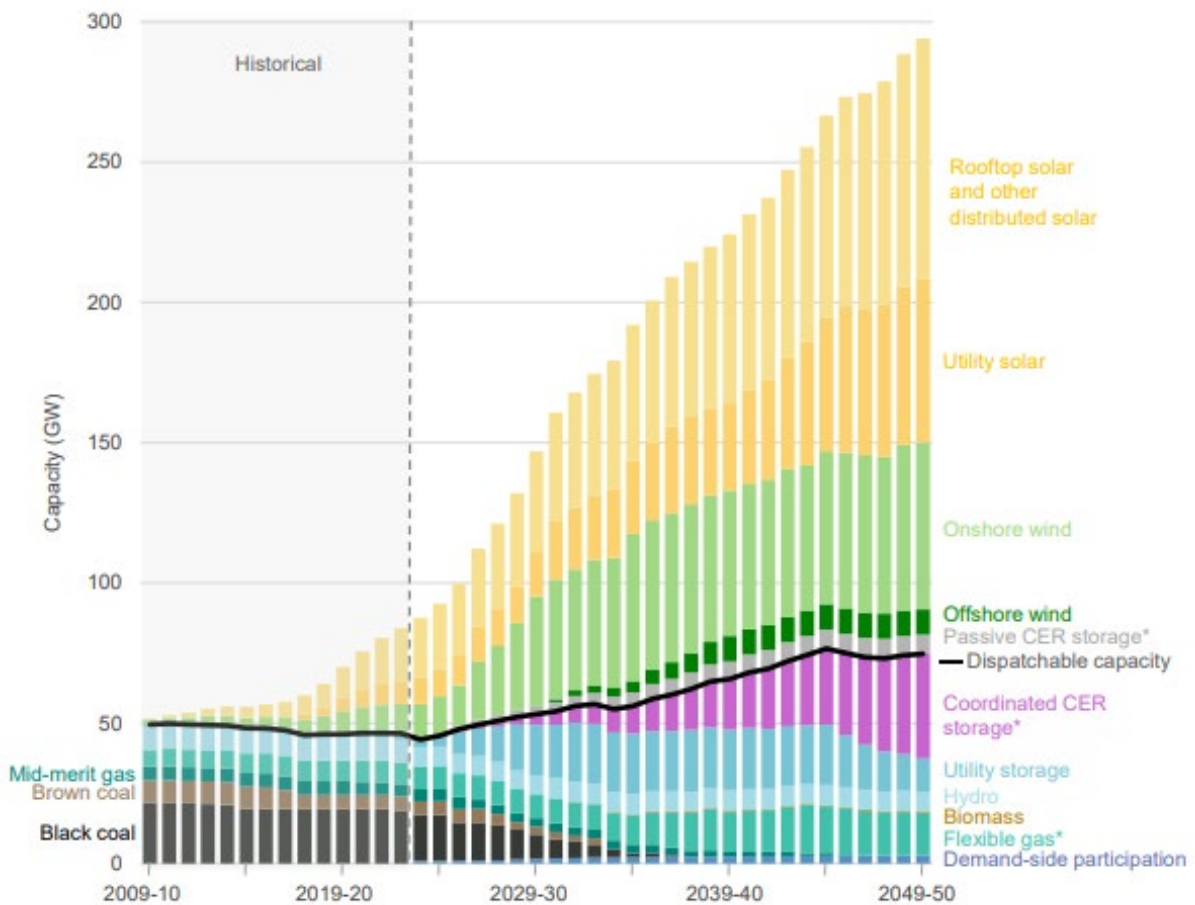
A challenge for wind and solar projects in NSW is commissioning the infrastructure in a timely manner to meet demand (e.g., secure suitable sites, obtain development consent, and progress through construction). The Clean Energy Council Power Playbook (CEC, 2023) states the need for the financial commitment of 5-7 GW per year of variable renewable energy generation projects across Australia to reach the targeted 82% renewables by 2030.

The 2024 Integrated System Plan (ISP) (AEMO, 2024) remains valid and highlights the planned retirement of existing coal fired electricity generation in NSW by 2040; however, it also forecasts that closure timeframes may be two to three times faster than those announced. At present, three of NSW coal-fired power stations accounting for over 6 GW of generation are planned to retire before 2030.

The Project remains consistent with the 2024 ISP and the ESOO 2025. The 2024 ISP (AEMO, 2024) states that the NEM must almost triple grid-scale variable renewable energy by 2030 and increase it six-fold by 2050. Four times the existing firming capacity is also required across the NEM to meet demand. This equates to the installation of approximately 6 GW of new renewable generation capacity every year across the NEM, compared to the current rate of less than 4 GW. Overall, the installed capacity of utility-scale wind and solar must increase from the current 21 GW to 127 GW by 2050.

The NEM forecasted generation mix is presented in Figure 2-1.

**FIGURE 2-1 NEM GENERATION MIX 2009-2049 (AEMO 2024)**



Variable forms of storage are required to firm both consumer-owned and utility-scale renewables at different times of the day and year. The NEM is forecast to need 36 GW / 522 GWh of storage capacity by 2034-2035, and 56 GW / 66 GWh by 2050.

The Project will assist in achieving state and national targets and the forecasts in the ISP and ESOO as:

- The Project will contribute positively to the sector-wide update of energy generation technology;
- The Project will generate enough renewable energy for about 426,000 average NSW homes, and displace approximately 2.4 million t CO<sub>2</sub><sup>e</sup> per annum;
- The Project will contribute to NSW and Australian Government emissions reduction targets;
- The Project is strategically located South West REZ (Figure 1-1), and aligns with the strategic objectives of the REZ, and relevant NSW and Australian Government strategies, policies, and plans across regional and local contexts;
- The Project Area was selected due to its:
  - Favourable wind resource;
  - Favourable topography;
  - Historical use for agricultural practices (grazing) and significant areas of predominantly cleared land;
  - Proximity to existing and planned transmission and distribution networks;
  - Location in a region with limited number of private dwellings;
  - Accessibility;
- The Project Layout has been amended to avoid and minimise environmental and social impacts and maximise the use of existing disturbed areas;
- The Project will provide ongoing economic benefits to the NSW and regional economy generating significant opportunities for local contractors and businesses to supply services during construction and operation, providing local employment, training and development opportunities for the regional workforce. Specifically, the Project is expected to generate:
  - Up to 650 Full Time Equivalent (FTE) jobs during construction; creating about:
    - \$217 million (M) in annual direct and indirect output;
    - \$74 M in annual direct and indirect value add;
    - \$22 M in annual direct and indirect household income;
    - 524 direct and indirect jobs;
  - Up to 12 FTE jobs during operations, creating about:
    - \$180M in annual direct and indirect regional output.
    - \$154M in annual direct and indirect regional value-added.
    - \$1M in annual direct and indirect household income.
    - 29 direct and indirect jobs.
  - The Project will provide a diversified income for host landholders through lease payments, which can be used to make their businesses more resilient to the impacts of droughts, fires, floods and commodity price fluctuations;
  - The Project will provide benefits to Project neighbours and the broader region through the establishment of a community benefit fund (CBF) to provide economic support to local non-profit organisations, community programs/events, local businesses, training, and services/infrastructure; and
- Potential impacts from the Project have been minimised and any residual impacts can be appropriately managed and/or offset in accordance with relevant policies.

## 2.2 SITE SETTING

A key early consideration in site selection for the Project was the excellent wind resource in the region combined with suitable topography, proximity and access to the existing 220 kV line, the planned Project EnergyConnect 330kV line, site accessibility, land ownership, community and stakeholder acceptance, and minimal environmental and social impacts.

Since submission of the EIS, the Project remains well suited to its regional and local context. The Project Area is located on land currently used for grazing and cropping. Wind farms and agricultural production can co-exist, and it is the intent of the Applicant that most of the Project Area will remain available for agricultural production during operation. Thus, the development of the Project as amended does not present major conflicts with its current or potential future land uses.

While grid connection has not been finalised and the Applicant was unsuccessful in obtaining rights to the SW REZ access scheme, they are pursuing several other options. These include:

- Data Centre Co-location (behind-the-meter partnership);
- Collaboration with TransGrid/Lumea and other developers to upgrade the existing 220 kV network infrastructure;
- Future SW REZ augmentations; and
- Joint transmission development partnerships with other developers.

Obtaining planning approval for the Project will enable progression of the transmission connection pathway. Other avenues through which the Project may connect to the network include:

- The failure of other developments that were awarded access rights and those rights being made open to other developers through another tender process; and
- Leveraging the potential for a future SW REZ transmission headroom assessment and an increase in the transfer capacity available, i.e., future SW REZ tenders.

### 3. DESCRIPTION OF THE AMENDMENTS

The amended Project layout, including siting of WTGs and other key infrastructure components, has been subject to an ongoing iterative design and siting process. This has been done with consideration of environmental, civil engineering and wind generation constraints and opportunities, as well as issues raised during ongoing community engagement.

Since the exhibition of the EIS, the Applicant has engaged further with landowners, Project neighbours, the broader community, local, State and Federal Government agencies, and business and stakeholder groups.

The Amended Project has:

- Further avoided and/or minimised adverse environmental impacts;
- Protected sensitive areas and receivers identified through specialist assessments including biodiversity, heritage, visual, hazards and risks;
- Addressed matters raised in submissions of the exhibited Project EIS and outcomes of ongoing engagement with the community, landowners, government agencies, local council and other stakeholders;
- Maximised the yield of wind power generation through suitable positioning of WTGs on-site and in consideration of heritage and environmental constraints; and
- Maintained minimum Project generation capacity to achieve commercial viability of the Project in the context of the cost required to connect to the existing electrical grid.

Table 3-1 provides a summary of the amendments to the Project since exhibition of the EIS and an updated Project description incorporating these amendments is provided in Appendix A.

TABLE 3-1 AMENDED PROJECT KEY CHANGES

Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
<b>Project Footprint</b>			
Project Area	18,012	18,006	Reduced by 6 ha (0.03%)
Temporary Disturbance Footprint	1,137 ha	Up to 764 ha	Reduced by 373 ha (33%).
Permanent Disturbance Footprint	574 ha	Up to 491 ha	Reduced by 83 ha (14%)
<b>WTGs</b>			
WTGs	155	114	Reduced by 41 WTGs (26%)
Rotor Diameter	Up to 183 m	Up to 183 m	No change
Blade Length	Up to 91.5 m	Up to 91.5 m	No change
Uppermost Blade Tip Height	Up to 291.5 m	Up to 291.5 m	No change
Tower (hub) Height	Up to 200 m	Up to 200 m	No change
WTG Hardstand Disturbance Area	Approx. 2.83 ha / WTG	Approx. 2.41 ha / WTG	Reduced by 0.42 ha / WTG
<b>Ancillary Infrastructure</b>			
330 kV transmission line	20.0 km	16.21 km	Reduced by 3.79 km (19%)
Underground 33 kV transmission line	175.3 km	195.6 km	Increased by 20.3 km (12%)
Overhead 33 kV transmission line	64.5 km	0 km	Reduced by 64.5 km (100%)
New 220 kV or 330 kV transmission line (Switching Station to proposed connection point)	-	0.7 km	Increased by 0.7 km (100%)
33/330 kV Substations	3	3	No change
	200 m x 300 m +35 m APZ all sides	190 m x 240 m +35 m APZ all sides	Reduced by 4.32 ha

Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
Switching Station	1	1	No change
	200 m x 300 m +35 m APZ on all sides	200 m x 300 m +35 m APZ on all sides	No change
BESS	200 MW / 800 MWh	200 MW / 800 MWh	No change
	400 m x 300 m +35 m APZ all sides	400 m x 300 m +35 m APZ all sides	No change
O&M Facility	3	1	Reduced by 2
	100 m x 100 m + 35 m APZ on all sides	100 m x 100 m + 35 m APZ on all sides	Reduced by 2 ha
Security Hut	4	2	Reduced by 2
	20 m x 20 m + 35 m APZ on all sides	20 m x 20 m + 35 m APZ on all sides	Reduced by 0.08 ha
Biosecurity Wash Bays	4	2	Reduced by 2
	70 m x 110 m + 35 m APZ on all sides	30 m x 30 m + 35 m APZ on all sides	Reduced by 2.9 ha
Internal Access Tracks	148.3 km	116.5 km	Reduced by 31.8 km
Site Access Points	4	2	Reduced by 2
Permanent Meteorological Masts	4	3	Reduced by 1
Transport Route	From: <ul style="list-style-type: none"> <li>• Port of Adelaide; and</li> <li>• Port of Newcastle.</li> </ul>	From: <ul style="list-style-type: none"> <li>• Port of Adelaide only.</li> </ul>	Elimination of transport route from Port of Newcastle

Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
<b>Temporary Facilities / Activities</b>			
Construction Duration	24 months, with peak construction activities over approx. 12 months	18 months, with peak construction activities over approx. 12 months	Duration has been reduced by 6 months
Construction Workforce	Up to 650 FTE	Up to 650 FTE	No change
Temporary Worker Accommodation Camp	1	1	No change
Temporary Meteorological Masts	4	3	Reduced by 1
Concrete Batching Plants	2	2	No change
Laydown Areas	3	4	Increased by 1
Construction Compound (e.g., site office, storage)	2	2	No change
Construction Carpark	0	2	Increased by 2
APZ Requirements for Temporary Facilities	<ul style="list-style-type: none"> <li>• Minimum 20 m per meteorological mast</li> <li>• Minimum 20 m all sides of buildings</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum 20 m per meteorological mast</li> <li>• Minimum 20 m all sides of buildings</li> </ul>	No change

## 4. STATUTORY CONTEXT

The statutory context of the Project remains consistent with that described in Section 4 of the EIS (ERM, 2024).

As set out in the EIS, the Project is declared SSD and approval is sought under Part 4, Division 4.7 of the EP&A Act. Under section 4.5(a) of the EP&A Act and s 2.7 of the Planning Systems SEPP, the consent authority for SSD is the Minister for Planning and Public Spaces unless any of the following circumstances apply, in which case the consent authority is the Independent Planning Commission:

- Murray River Council makes a submission by way of objection under the mandatory requirements for community participation;
- At least 50 submissions (other than from a council) are made by way of objection under the mandatory requirements for community participation; or
- The Applicant has disclosed a reportable political donation.

None of the above circumstances apply and, therefore, the Minister for Planning and Public Spaces is the consent authority for this Project.

An updated statutory compliance table that identifies all relevant statutory obligations and where these have been addressed is provided in Appendix C.

## 5. ENGAGEMENT

### 5.1 REGULATOR ENGAGEMENT

A summary of engagement undertaken by the Applicant with NSW government agencies and authorities since exhibition of the EIS is outlined in Table 5-1.

**TABLE 5-1 REGULATOR ENGAGEMENT OVERVIEW**

Engagement Activity	Description
<b>DPHI</b>	
20 August 2024	<ul style="list-style-type: none"> <li>Discussed DPHI requirements and expectations regarding submissions from several agencies (TfNSW, RFS, BCS and CASA), outline proposed refinements to the Project in response to submissions received, the need for an Amendment Report and Project submission timeline.</li> </ul>
7 November 2024	<ul style="list-style-type: none"> <li>Discussed progress with Response to Submissions, update proposed amendments to the Project and Project submission timeline.</li> </ul>
9 October 2025	<ul style="list-style-type: none"> <li>Discussed amended design, transmission connection, progress with Response to Submissions and Amendment Report.</li> </ul>
<b>BCS/CPHR</b>	
21 August 2024	<ul style="list-style-type: none"> <li>Discussed the BCS submission for the Project, the proposed response and Updated Biodiversity Development Assessment Report (BDAR) methodology to clarify and address issues raised in the BCS submissions.</li> <li>BCS confirmed the proposed methodology, and approach will be accepted as consistent with the transitional arrangements when the reviewing the Updated BDAR.</li> </ul>
28 August 2025	<ul style="list-style-type: none"> <li>Discussed progress with responses to BCS submission, additional survey effort</li> </ul>
<b>Heritage NSW</b>	
6 September 2024	<ul style="list-style-type: none"> <li>To discuss the Heritage NSW submission for the Project and provide an update on the engagement Acciona have undertaken with the Mutthi Mutthi and their preference to not undertake test excavation prior to Determination.</li> </ul>
<b>Department of Regional Development</b>	
17 July 2024	<ul style="list-style-type: none"> <li>Introduction to the Project and the Project Team</li> <li>To discuss regional opportunities that will be generated by the Project.</li> </ul>

### 5.2 COMMUNITY AND STAKEHOLDER ENGAGEMENT

The Applicant has continued to engage with and seek feedback from the community and other stakeholders as detailed in Table 5-2.

TABLE 5-2 COMMUNITY AND STAKEHOLDER ENGAGEMENT OVERVIEW

Engagement Activity	Description
<b>Landholder</b>	
23 May 2024	<ul style="list-style-type: none"> <li>Notification of Public Exhibition and link to information.</li> </ul>
28 November 2024	<ul style="list-style-type: none"> <li>Meeting in Echuca with landowner to brief on general Project updates and discuss status of Access Rights tender.</li> </ul>
3 February 2025	<ul style="list-style-type: none"> <li>Phone call with landowner to notify of unsuccessful Access Rights tender outcome.</li> </ul>
Ongoing, monthly	<ul style="list-style-type: none"> <li>Phone calls and emails with landowners to update on Project development status and ongoing network access options.</li> </ul>
<b>Nearby Communities, Community Groups and Business Groups</b>	
May 2024	<ul style="list-style-type: none"> <li>Advertisements in local publications and on social media to promote information sessions.</li> </ul>
23 May 2024	<ul style="list-style-type: none"> <li>Notification of Public Exhibition and link to information.</li> <li>Advertisement to promote information sessions.</li> <li>General Project update.</li> <li>Upcoming EIS information sessions.</li> <li>Environmental Impact Statement.</li> <li>Job and business opportunities.</li> </ul>
24 May 2024	<ul style="list-style-type: none"> <li>Notification of Public Exhibition and link to information.</li> <li>Pop-up sessions to promote EIS information sessions discussing: <ul style="list-style-type: none"> <li>General Project update.</li> <li>Upcoming EIS information sessions.</li> <li>Environmental Impact Statement.</li> <li>Job and business opportunities.</li> </ul> </li> </ul>
30 May 2024	<ul style="list-style-type: none"> <li>Information session to discuss the Environmental Impact Statement including emergency response and any other general interest.</li> </ul>
31 May 2024	<ul style="list-style-type: none"> <li>Discuss opportunities to support local organisations and activities.</li> <li>Concerns about housing.</li> <li>Discussion around not wanting assets removed.</li> <li>No concerns about the Project but interest in timelines and fire management.</li> </ul>
5 June 2024	<ul style="list-style-type: none"> <li>Discussion about positive reception to advertisement of the sessions.</li> <li>Information on the Project including decommissioning, transport route, impacts on the community.</li> <li>Discussion about positive reception to information provided to the community.</li> </ul>
6 June 2024	<ul style="list-style-type: none"> <li>Homes still are on 3G network that will be turned off.</li> <li>Bad internet in the mornings.</li> <li>Opportunities support local events.</li> <li>Opportunities to communicate with local community.</li> </ul>
11 June 2024	<ul style="list-style-type: none"> <li>No attendees.</li> </ul>
12 June 2024	<ul style="list-style-type: none"> <li>Community is more concerned with Transgrid as closer to town.</li> <li>More accommodation needed.</li> <li>Support for local events and facilities.</li> <li>Interested in the project layout, location, fire, and noise.</li> </ul>
28 June 2024	<ul style="list-style-type: none"> <li>Follow up to in person meeting, and other updates.</li> </ul>

<b>Engagement Activity</b>	<b>Description</b>
18 August 2024	<ul style="list-style-type: none"> <li>Request received to provide support for the Moulamein "Show 'n' Shine" event.</li> <li>Resulting discussion followed as the event was supported.</li> </ul>
29 September 2024	<ul style="list-style-type: none"> <li>Request received to provide support for the Moulamein Races.</li> <li>Event unable to be supported.</li> </ul>
29 October 2024	<ul style="list-style-type: none"> <li>Request received to provide support for the Moulamein Fishing competition.</li> <li>Event supported.</li> </ul>
12 November 2024	<ul style="list-style-type: none"> <li>General Project update.</li> <li>Opportunities associated with the Project.</li> <li>Support for community events and activities.</li> </ul>
8 March 2025 – 9 March 2025	<ul style="list-style-type: none"> <li>Support for the Moulamein Fishing Competition.</li> </ul>
19 April 2025	<ul style="list-style-type: none"> <li>Support for the Moulamein Preschool Annual Yabby Races and Easter Fair.</li> </ul>
24 April 2025	<ul style="list-style-type: none"> <li>Update on South West Renewable Energy Zone Access Rights.</li> </ul>
30 April 2025	<ul style="list-style-type: none"> <li>Communication to share information regarding successful applicants for Access Rights.</li> </ul>
<b>Traditional Owners, Aboriginal Community Members and Stakeholders, Aboriginal Partnerships and Registered Aboriginal Parties.</b>	
26 May 2024	<ul style="list-style-type: none"> <li>Meeting in person to discuss areas of interest and areas of concern.</li> </ul>
28 June 2024	<ul style="list-style-type: none"> <li>Follow up to in person meeting, and other updates.</li> </ul>
25 July 2024	<ul style="list-style-type: none"> <li>Meeting in person to discuss: <ul style="list-style-type: none"> <li>General Project Update.</li> <li>Development of an Aboriginal Participation Plan.</li> <li>Completion of Cultural Awareness Training.</li> </ul> </li> </ul>
15 August 2024	<ul style="list-style-type: none"> <li>Meeting online to introduce the Project.</li> <li>Develop an Aboriginal Partnerships Plan.</li> <li>Participation in workshops.</li> </ul>
2 August 2024 – 16 August 2024	<ul style="list-style-type: none"> <li>Discussed preferred dates for workshop.</li> <li>Invitation to Aboriginal Participation Plan workshop.</li> </ul>
20 August 2024	<ul style="list-style-type: none"> <li>Members of the Project Team participated in a day long On Country Cultural Awareness and Immersion session.</li> </ul>
29 August 2024	<ul style="list-style-type: none"> <li>Discussion on the Aboriginal Participation Plan where discussion focused on: <ul style="list-style-type: none"> <li>Project overview and update.</li> <li>Opportunities associated with the Project.</li> <li>Interest areas of Aboriginal Rights Holders and stakeholders.</li> <li>Development of an Aboriginal Participation Plan.</li> </ul> </li> </ul>
9 September 2024	<ul style="list-style-type: none"> <li>Emails to confirm discussions regarding timing of test excavations.</li> </ul>
10 September 2024	<ul style="list-style-type: none"> <li>Follow up information, from Aboriginal Participation Plan workshop.</li> </ul>
17 September 2024	<ul style="list-style-type: none"> <li>Sharing of draft Aboriginal Participation Plan for feedback.</li> <li>Discussion regarding the timing of test excavations.</li> </ul>
18 September 2024	<ul style="list-style-type: none"> <li>Sharing of draft Aboriginal Participation Plan for feedback.</li> <li>Discussion regarding the timing of test excavations.</li> </ul>

Engagement Activity	Description
19 September 2024	<ul style="list-style-type: none"> <li>• Introduction to the proposed Project and project update.</li> <li>• Follow up information provided, post meeting, including NSW Government guidelines.</li> </ul>
20 September 2024	<ul style="list-style-type: none"> <li>• Received and discussed Letter of Support for Keri Keri Wind Farm.</li> </ul>
22 September 2024	<ul style="list-style-type: none"> <li>• Request received to provide support for community program.</li> </ul>
9 October 2024 – 14 October 2024	<ul style="list-style-type: none"> <li>• Covering of Aboriginal Ancestral Remains (AAR).</li> </ul>
24 October 2024	<ul style="list-style-type: none"> <li>• Discussion on the outcome of fund request where the program was not supported.</li> </ul>
10 December 2024	<ul style="list-style-type: none"> <li>• ERM provided the updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and requested feedback from the RAPs.</li> </ul>
20 December 2024	<ul style="list-style-type: none"> <li>• Phone call raising concerns regarding not receiving ACHAR directly.</li> <li>• Email responding to Traditional Owners concerns about not receiving ACHAR directly.</li> </ul>
9 January 2025	<ul style="list-style-type: none"> <li>• Information provided by the Traditional Owner regarding preferred Archaeologist.</li> <li>• Printed copies of ACHAR provided via post.</li> </ul>
10 January 2025	<ul style="list-style-type: none"> <li>• Email to provide link and advise that printed copies of the ACHAR were provided via post.</li> </ul>
13 January 2025	<ul style="list-style-type: none"> <li>• Provided updated ACHAR link directly to Traditional Owner. Had previously been provided via a Registered Aboriginal Party.</li> </ul>
15 January 2025 – 21 May 2025	<ul style="list-style-type: none"> <li>• Covering of Aboriginal Ancestral Remains (AAR).</li> </ul>
23 January 2025	<ul style="list-style-type: none"> <li>• Status of the project and ability to fund works requested.</li> </ul>
1 February 2025	<ul style="list-style-type: none"> <li>• Discussion covered several topics: <ul style="list-style-type: none"> <li>◦ General Project update.</li> <li>◦ Feedback on proposal to cover Aboriginal ancestral remains.</li> <li>◦ Communication regarding unsuccessful in application for Access Rights.</li> <li>◦ Check in regarding updated Aboriginal Cultural Heritage Assessment Report (ACHAR)</li> </ul> </li> </ul>
2 February 2025	<ul style="list-style-type: none"> <li>• Discussion covered several topics: <ul style="list-style-type: none"> <li>◦ General Project update.</li> <li>◦ Feedback on proposal to cover Aboriginal ancestral remains.</li> <li>◦ Communication regarding unsuccessful in application for Access Rights.</li> <li>◦ Check in regarding updated Aboriginal Cultural Heritage Assessment Report (ACHAR)</li> </ul> </li> </ul>
5 February 2025	<ul style="list-style-type: none"> <li>• Follow up information provided, including information from the Aboriginal Participation Plan workshop.</li> </ul>
2 November 2025	<ul style="list-style-type: none"> <li>• ERM provided the updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and requested feedback from the RAPs.</li> </ul>

<b>Engagement Activity</b>	<b>Description</b>
<b>Murray River Shire Council</b>	
10 May 2024	<ul style="list-style-type: none"> <li>Notification of submission of the EIS and intention to be available in local communities during the Public Exhibition period.</li> </ul>
1 July 2025	<ul style="list-style-type: none"> <li>Update on Response to Submission timeframes.</li> </ul>
17 July 2025	<ul style="list-style-type: none"> <li>Murray River Council provided an update on Council staff.</li> </ul>
20 October 2025	<ul style="list-style-type: none"> <li>Introduction of Project and Project Team - for new Council staff.</li> <li>Request to provide update.</li> </ul>
29 October 2025	<ul style="list-style-type: none"> <li>Letter of Intent to enter into a Planning Agreement in relation to the Keri Keri Wind Farm.</li> </ul>
7 November 2025	<ul style="list-style-type: none"> <li>Several topics were discussed during this in person meeting covering: <ul style="list-style-type: none"> <li>Introduction to Project for new personnel.</li> <li>General Project update.</li> <li>Feedback on updated Council submission.</li> <li>Council interest areas and feedback.</li> <li>Voluntary Planning Agreement.</li> </ul> </li> </ul>
10 November 2025	<ul style="list-style-type: none"> <li>Follow up information provided post in person meeting.</li> </ul>
<b>Balranald Shire Council</b>	
10 May 2024	<ul style="list-style-type: none"> <li>Notification of submission of the EIS and intention to be available in local communities during the Public Exhibition period.</li> </ul>
20 October 2025	<ul style="list-style-type: none"> <li>Introduction of Project and Project Team - for new Council staff.</li> <li>Request to provide update. "</li> </ul>
6 November 2025	<ul style="list-style-type: none"> <li>ERM provided the updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and requested feedback from the RAPs.</li> </ul>
10 November 2025	<ul style="list-style-type: none"> <li>Follow up information provided post in person meeting.</li> </ul>
<b>Hay Shire Council</b>	
10 May 2024	<ul style="list-style-type: none"> <li>Notification of submission of the EIS and intention to be available in local communities during the Public Exhibition period.</li> </ul>

## 6. ASSESSMENT OF IMPACTS

This section provides a detailed summary of the findings of further assessment of the impacts of the proposed amendments, including details about the impacts of the amendments and the impacts of the amended Project.

Further to this, and in response to submissions received, the Yanga State Conservation Area (SCA) has been recognised throughout the assessment of impacts and consideration has been given to the issues outlined in the 'Developments Adjacent to National Parks and Wildlife Service Lands: Guidelines for Consent and Planning Authorities' (NPWS Guidelines) (NSW DPIE, 2020). Table 6-1 provides an overview of where the issues have been addressed, alongside proposed mitigation / management measures, noting that Yanga SCA was also considered throughout the EIS stage.

TABLE 6-1 IMPACTS ON YANGA STATE CONSERVATION AREA

Issue	Where Considered	Potential Impact(s) Associated with the Amended Project	Mitigation / Management Measures
Erosion and sediment control	<ul style="list-style-type: none"> <li>Amended Biodiversity Development Assessment Report (refer Appendix D)</li> <li>Addendum Flood Assessment (refer Appendix H)</li> <li>Conceptual Soil and Water Management Plan (ERM, 2024)</li> </ul>	Removal of vegetation and disturbance of groundcover from construction activities may expose the soil and increase the risk of erosion and subsequent sedimentation within Yanga SCA, however, the risk is considered minimal.	To be detailed in a dedicated, Project-specific Erosion and Sediment Control Plan which will incorporate the recommended approach outlined in s2.1 of the NPWS Guidelines (2020).
Stormwater runoff	<ul style="list-style-type: none"> <li>Conceptual Soil and Water Management Plan (ERM, 2024)</li> </ul>	Removal of vegetation and disturbance of groundcover from construction activities may increase the risk of discharge of stormwater to Yanga SCA, however, the risk is considered.	To be detailed in a dedicated Project-specific Soil and Water Management Plan which will incorporate the recommended approach outlined in s2.2 of the NPWS Guidelines (2020).
Wastewater	<ul style="list-style-type: none"> <li>Conceptual Soil and Water Management Plan (ERM, 2024)</li> </ul>	Wastewater disposal may increase the risk of discharge of wastewater to Yanga SCA if not designed, installed, operated or maintained correctly, however, the risk is considered minimal given that MRC's existing wastewater and sewage treatment plant are considered sufficient.	To be detailed in dedicated, Project-specific Soil and Water, and Waste Management Plans which will incorporate the recommended approach outlined in s2.3 of the NPWS Guidelines (2020).
Pests, weeds and edge effects	<ul style="list-style-type: none"> <li>Amended Biodiversity Development Assessment Report (refer Appendix D)</li> <li>Amended Agricultural Impact Assessment (refer Appendix L)</li> </ul>	The project may lead to an increase in invasive species and decline in biodiversity within Yanga SCA. Clearing vegetation along or near the boundary of Yanga SCA may lead to edge effects such as the increased drying of soils and consequent changes to vegetation at the land boundary. The edge effect may lead to a decline in fauna species that are sensitive to changes in vegetation, and an increase in predation along the edge of the SCA.	To be detailed in the following specific management plans: <ul style="list-style-type: none"> <li>Feral Pest Management Program</li> <li>Weed Management Plan</li> <li>Construction Environmental Management Plan</li> </ul> All of which will incorporate the recommended approach in s2.4 of the NPWS Guidelines (2020).

Issue	Where Considered	Potential Impact(s) Associated with the Amended Project	Mitigation / Management Measures
Fire and the location of asset protection zones	<ul style="list-style-type: none"> <li>Bushfire Risk Assessment (ERM, 2024))</li> </ul>	<p>The Project has the potential to alter fire regimes in the area, which in turn may degrade Yanga SCA, the risk of which will be exacerbated by climate change. The Yanga SCA is mapped as bushfire prone lands; however, most historic fires originate from sources outside the park and from human-caused ignitions. Therefore, fire management needs to be integrated within the bushfire management of the Project, to protect the SCA from potential fires from the Project or adjacent lands.</p>	<p>Mitigation will be a combination of complementary strategies, that incorporate the recommended approach in s2.5 of the NPWS Guidelines (2020), including (but not limited to):</p> <ul style="list-style-type: none"> <li>Asset Protection Zones (APZs).</li> <li>Monitoring masts.</li> <li>Measures during construction, such as: <ul style="list-style-type: none"> <li>Additional water supplies.</li> <li>Firefighting equipment.</li> <li>Signage.</li> </ul> </li> <li>Measures during operation, such as: <ul style="list-style-type: none"> <li>SCADA System.</li> <li>Liaise with NSW RFS, CASA, RAAF and local aerial operators to develop safe working and emergency procedures.</li> </ul> </li> <li>Proposed road upgrades will complement the existing fire control strategies within Yanga SCA.</li> <li>Emergency Management and Operations Plan.</li> <li>Activities under transmission line restricted.</li> <li>Water storage for fire response.</li> </ul>
Boundary encroachments and access through NPWS land	N/A – the Project will not result in encroachment or require access through NPWS land	No impact identified.	N/A
Visual, odour, noise, vibration, air quality and amenity impacts	<ul style="list-style-type: none"> <li>Amended Noise and Vibration Impact Assessment (refer Appendix G);</li> <li>Addendum Landscape and Visual Impact Assessment (refer Appendix F)</li> </ul>	No impact identified.	N/A

Issue	Where Considered	Potential Impact(s) Associated with the Amended Project	Mitigation / Management Measures
Threats to ecological connectivity and groundwater-dependent ecosystems	<ul style="list-style-type: none"> <li>Amended Biodiversity Development Assessment Report (refer Appendix D)</li> </ul>	<p>Naturally vegetated areas adjoining the Yanga SCA provide ecological connectivity through the Project Area. Removal of vegetation may result in a reduction in habitat connectivity value, not only from the loss in vegetation, but also from an increase in edge effects (such as light, and noise pollution).</p> <p>The areas of native shrubland and grasslands within the Project Area may contain some connectivity value, particularly for small and cryptic species.</p>	<p>The NPWS Guidelines (2020) recommend vegetation close to the Yanga SCA that exhibit ecological connectivity should be retained. Therefore, vegetation removal in proximity to the SCA has been limited and removal will not result in complete isolation of any habitat patches due to the narrow, linear nature of the Project.</p>
Cultural heritage	<ul style="list-style-type: none"> <li>Amended Aboriginal Cultural Heritage Assessment Report (refer Appendix E)</li> </ul>	No impact identified	N/A
Access to parks	N/A – the Project will not compromise public and/or NPWS access to Yanga SCA	No impact identified	N/A

## 6.1 BIODIVERSITY

### 6.1.1 BACKGROUND

The Biodiversity Development Assessment Report (BDAR) prepared for the EIS (ERM, 2024) has been updated to assess potential impacts to biodiversity associated with the amended Project (Amended BDAR; Appendix D). The Amended BDAR includes updates, as necessary, to respond to matters raised in submissions.

Amendments relevant to potential impacts to biodiversity include:

- Reduction in number of WTGs from 155 to 114;
- Relocation and micro-siting of WTGs;
- Reduction in extent of underground electrical reticulation and other power infrastructure;
- Reduction in number of site access points and biosecurity wash bays to two;
- Reduction in extent of site access tracks;
- Reduction in number of permanent met masts to three; and,
- Removal of proposed Port of Newcastle site access route reducing need for external road works.

The Amended BDAR has been prepared in accordance with the 'Biodiversity Assessment Method 2020' (BAM) (NSW DPIE, 2020) and relevant, applicable guidelines, including NPWS Guidelines (NSW DPIE, 2020).

### 6.1.2 IMPACT ASSESSMENT

#### 6.1.2.1 BIODIVERSITY VALUES WITHIN THE SUBJECT LAND

The amended Project has resulted in further avoidance and minimisation of impacts to biodiversity values. Most notably, turbines originally proposed in proximity to raptor nesting sites, remnant woodland habitat, ephemeral wetlands and habitat for the Plains-wanderer (*Pedionomus torquatus*) have been removed or relocated.

Since exhibition of the EIS, additional field surveys have been undertaken. Data from these surveys has been used to update vegetation mapping, accurately delineate threatened species polygons, and inform the collision risk assessment (refer Table 6-2).

No threatened ecological communities (TECs) or entities at risk of serious and irreversible impacts (SAII) were found to occur within the Subject Land.

**TABLE 6-2 SURVEYS COMPLETED SINCE EXHIBITION OF THE EIS**

Season	Date(s)	Survey Methods	Company
<b>Subject Land</b>			
Autumn 2024	27 – 31 May 2024	• Bird Utilisation Surveys (BUS)	• ERM
Winter 2024	26 – 30 August 2024	• BUS • Targeted threatened fauna surveys	• ERM

Season	Date(s)	Survey Methods	Company
Spring 2024	15 – 28 September 2024	<ul style="list-style-type: none"> <li>BAM plots</li> <li>Targeted threatened flora transects</li> <li>Targeted threatened fauna surveys</li> </ul>	<ul style="list-style-type: none"> <li>ERM</li> <li>Hunter Ecology</li> </ul>
	26 – 30 November 2024	<ul style="list-style-type: none"> <li>BUS</li> <li>BAM plots</li> <li>Targeted threatened flora transects</li> <li>Targeted threatened fauna surveys</li> </ul>	<ul style="list-style-type: none"> <li>ERM</li> </ul>
Spring 2025	29 September – 2 October 2025	<ul style="list-style-type: none"> <li>BAM plots</li> <li>Targeted threatened flora transects</li> <li>Targeted threatened fauna surveys</li> </ul>	<ul style="list-style-type: none"> <li>ERM</li> </ul>
<b>Transport Route</b>			
Spring 2025	September 2025	<ul style="list-style-type: none"> <li>BAM plots</li> <li>Targeted threatened flora transects</li> </ul>	<ul style="list-style-type: none"> <li>ERM</li> </ul>

## Native Vegetation

The amended Project has resulted in a reduction in the Disturbance Footprint from 1,137 ha (temporary Disturbance Footprint – EIS) to 764 ha (temporary Disturbance Footprint – amended Project). This represents a 27% reduction in impacts, which has avoided impacts to 366.07 ha of native vegetation. Impacts to native vegetation are now confined to PCT 164 and PCT 163. Impacts on PCT 26, PCT 44 and PCT 160 have been avoided.

Table 6-3 identifies the biodiversity values that are required to be offset as per subsection 9.2.1(1) of the BAM. Vegetation Integrity Scores (VISs) were obtained for each Vegetation Zone (VZ) (refer Figure 6-1) through the collection of BAM plots, which aided in the delineation of PCTs across the Subject Land. VISs were compared to their proposed clearance to result in the ecosystem credits expected due to impacts from the amended Project.

Ecosystem offset credits required for the amended Project have been reduced (from the EIS BDAR) by 18,048 credits, representing a significant reduction in impacts on native vegetation.

**TABLE 6-3 IMPACTS THAT REQUIRE AN OFFSET – ECOSYSTEM CREDITS**

VZ	PCT ID	Condition	TEC	VIS	Biodiversity Risk Weighting	Impact Area (ha)	Ecosystem Credits Required
<b>Subject Land</b>							
VZ01	164	Grassy	No	80.1	1.5	197.37	5,929
VZ02	164	Open	No	53.1	1.5	138.82	2,766
VZ03	164	Degraded	No	36.5	1.5	18.33	251
VZ04	164	Dense	No	91.4	1.5	223.98	7,680
VZ05	164	Gilgais	No	68.2	1.5	70.92	1,815
VZ06	163	Shrubland	No	98.3	1.5	115.47	4,256
<b>Transport Route</b>							
VZ07	159	Haul Route	No	53.9	2.5	0.17	6

## Threatened Species and Threatened Species' Habitat

The amended Project, informed by additional survey effort, has also avoided direct impacts to the Slender Darling Pea (*Swainsona murrayana*) and the Little Eagle (*Hieraaetus morphnoides*). Impacts to the Little Eagle (*Hieraaetus morphnoides*) were eliminated due to a lack of breeding habitat in the Subject Land, while impacts to the Slender Darling-pea (*Swainsona murrayana*) were eliminated as the amended Project avoids records and habitat for this species. Potential impact to the Mossgiel Daisy (*Brachyscome papillosa*) and Chariot Wheels (*Maireana cheelii*) remain; however, these have been significantly reduced (by 86% and 97% respectively).

Species offset credits for the amended Project have been reduced (from the EIS BDAR) by 118,153 credits representing a significant reduction in impacts on threatened species and threatened species' habitat.

Table 6-4 summarises potential impacts to species credit species that will require offsetting.

**TABLE 6-4 IMPACTS THAT REQUIRE AND OFFSET – SPECIES CREDITS**

Candidate Species		BC Act Status <sup>1</sup>	EPBC Act Status <sup>1</sup>	Biodiversity Risk Weighting	Loss of Habitat (ha)	Species Credits Required
Common Name	Scientific Name					
Mossgiel Daisy	<i>Brachyscome papillosa</i>	V	V	2.00	162.02	6,444
Chariot Wheels	<i>Maireana cheelii</i>	V	V	2.00	27.97	1,217

1. V=Vulnerable

### 6.1.2.2 INDIRECT IMPACTS

The amended Project could result in the following indirect impacts on biodiversity:

- Inadvertent impacts on adjacent habitat or vegetation;
- Reduced viability of adjacent habitat due to edge effects;
- Transportation of weeds and pathogens from the subject site to adjacent vegetation;
- Trampling of threatened flora species;
- Increase in predators; and
- Increase in pest animal populations.

The potential for indirect impacts has been reduced commensurate with the reduction in elements of the amended Project description. Mitigation measures proposed in the EIS and Amended BDAR will avoid or minimise the potential for indirect impacts.

### 6.1.2.3 PRESCRIBED IMPACTS

The amended Project is anticipated to have similar prescribed impacts (to those presented in the EIS); however, the potential magnitude and spatial extent of these impacts is significantly reduced. Prescribed impacts may relate to:

- Impacts on hydrological processes;
- Increased risk of introduction of predatory mammal species;
- Increased risk of vehicle strike; and
- Risk of turbine strike.

#### 6.1.2.4 CUMULATIVE IMPACTS

If constructed, reasonably foreseeable projects in the vicinity of the Project (Section 8.8 of Appendix D) may result in the removal of about 11,000 ha of native vegetation and habitat for threatened species. Clearing of native vegetation is largely confined to chenopod shrublands, most notably PCT 164 which is a degraded native vegetation community that generally has few high biodiversity values.

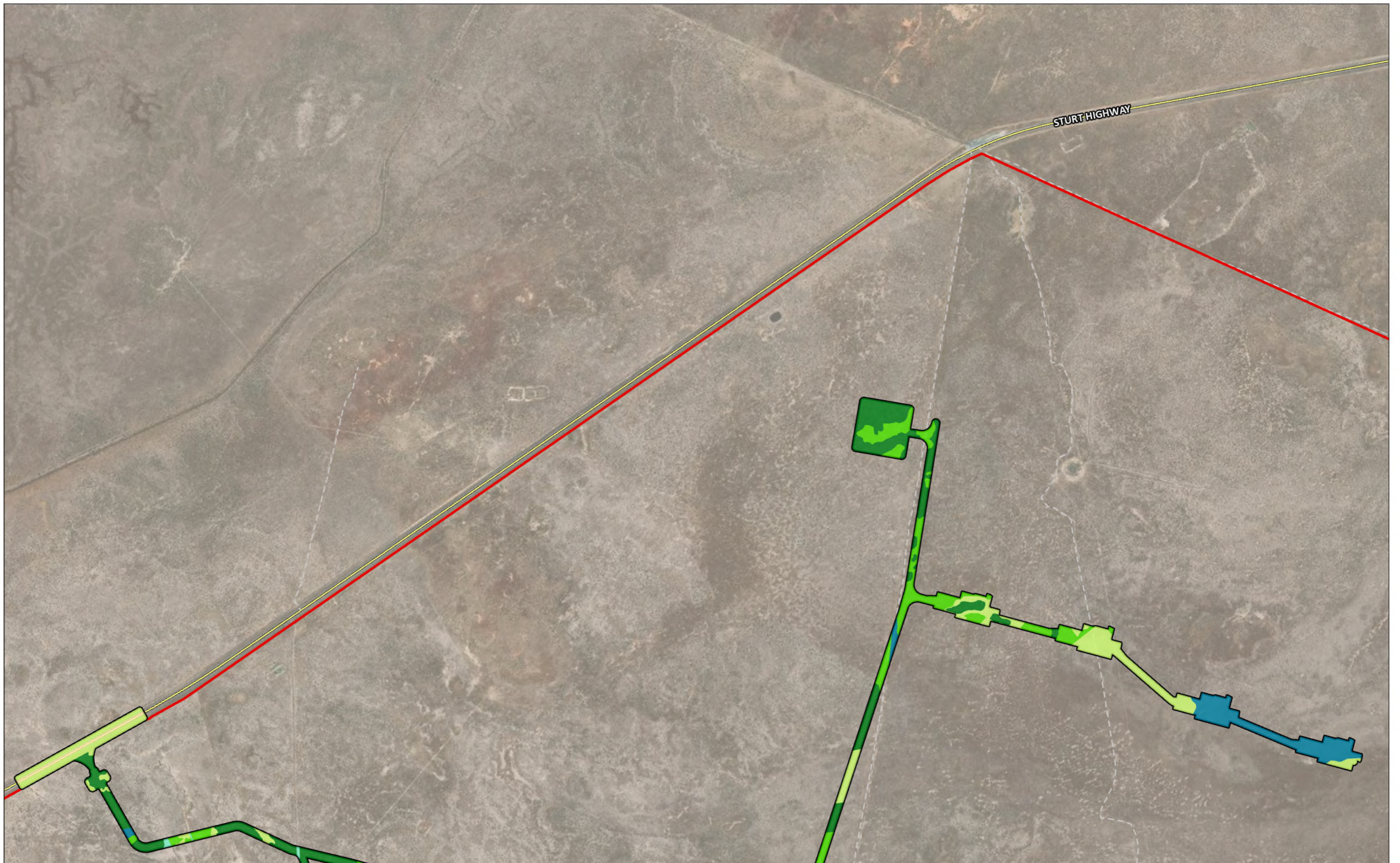
Woody vegetation is rare in the region and, where it does exist, it is likely to contain some of the highest biodiversity values found in the Murrumbidgee IBRA subregion. The project will not impact on any woody vegetation. Habitat for threatened species has been avoided by the amended Project, by concentrating development in already disturbed areas of PCT 164. These areas were assessed to have low diversity and sparse vegetation cover, as opposed to other vegetation types that comprise higher biodiversity values.

Relatively speaking, potential Project impacts are negligible, representing about 0.1% of clearing that may occur for reasonably foreseeable projects in the vicinity of the Project. As such, the Project is unlikely contribute to cumulative impact on biodiversity values within the region.

#### 6.1.3 UPDATED MITIGATION AND MANAGEMENT

Both ecosystem offset credits and species offset credits have reduced significantly as a result of the amended Project. The Amended BDAR details the mitigation and management measures proposed to avoid or minimise impacts to biodiversity values.

In response to submissions received, a draft Bird and Bat Adaptive Management Plan has been produced and is attached as Appendix A of the Amended BDAR (refer Appendix D). In addition to the management plans outlined in the EIS BDAR (Construction Environmental Management Plan and Pest Control Management Plan), the amended BDAR also includes recommendations for the development of a Biodiversity Management Plan, Construction Traffic Management Plan, and a Soil and Water Management Plan.



**Legend**

- Project Area
- Subject Land
- Main Road
- Road

--- Path/Track

**Vegetation Zone**

- PCT163 - VZ6
- PCT164 - VZ1

PCT164 - VZ2

PCT164 - VZ3

PCT164 - VZ4

Non-native Vegetation



Coordinate System:  
GDA 1994 MGA Zone 54  
Date: 19/12/2025  
Created By: VN  
Drawing Size: A3  
0 200 400m

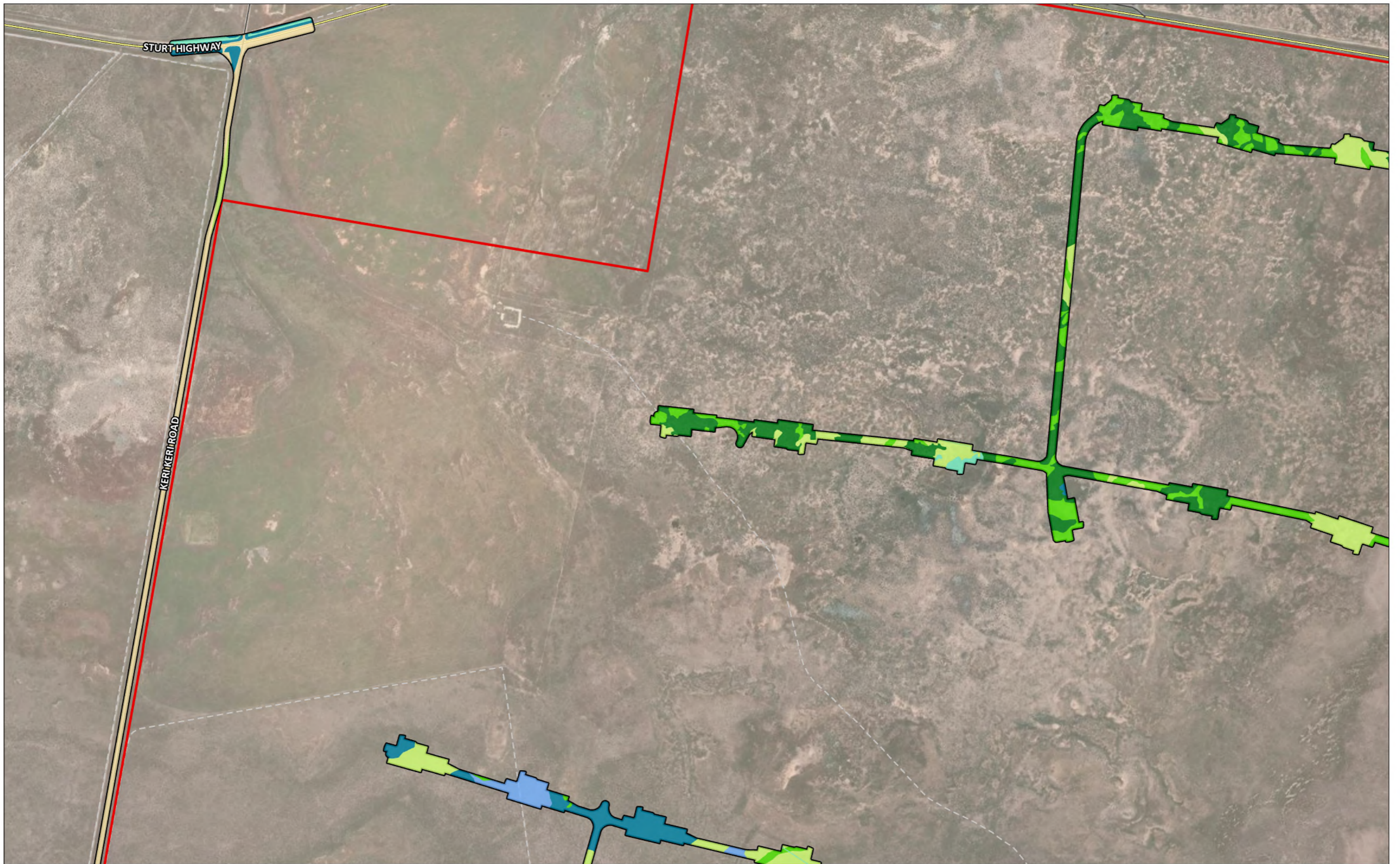


1:15,000

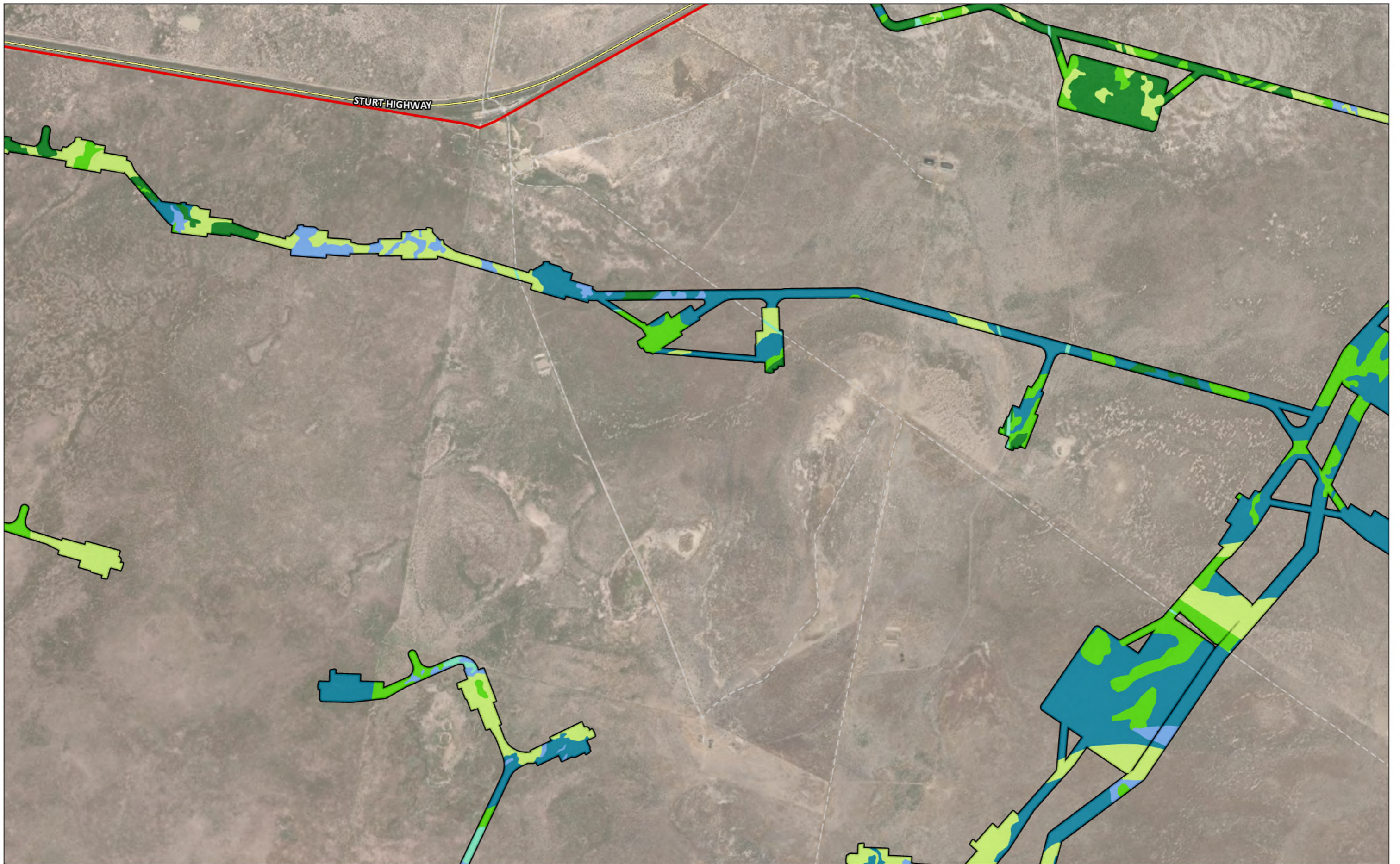
**F6-1 Vegetation Zones within the Subject Land  
Map 1 of 9**

**Keri Keri Windfarm  
Amendment Report**  
Acciona





<p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid red; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Project Area</li> <li><span style="border: 1px solid black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Subject Land</li> <li><span style="border-bottom: 1px solid black; width: 15px; margin-right: 5px;"></span> Main Road</li> <li><span style="border-bottom: 1px solid grey; width: 15px; margin-right: 5px;"></span> Road</li> <li><span style="border-bottom: 1px dashed grey; width: 15px; margin-right: 5px;"></span> Path/Track</li> </ul>	<p><b>Vegetation Zone</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: darkgreen; margin-right: 5px;"></span> PCT163 - VZ6</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: lightgreen; margin-right: 5px;"></span> PCT164 - VZ1</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: mediumgreen; margin-right: 5px;"></span> PCT164 - VZ2</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: cyan; margin-right: 5px;"></span> PCT164 - VZ3</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: blue; margin-right: 5px;"></span> PCT164 - VZ4</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: lightblue; margin-right: 5px;"></span> PCT164 - VZ5</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: yellow; margin-right: 5px;"></span> Non-native Vegetation</li> </ul>		<p>Coordinate System: GDA 1994 MGA Zone 54</p> <p>Date: 19/12/2025</p> <p>Created By: VN</p> <p>Drawing Size: A3</p> <p>0 200 400m</p> <p>1:15,000</p>	<p><b>F6-1 Vegetation Zones within the Subject Land</b> <b>Map 2 of 9</b></p> <p><b>Keri Keri Windfarm</b> <b>Amendment Report</b> Acciona</p>
---	--	---	--	--	--



**Legend**

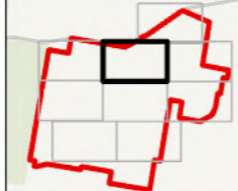
- Project Area
- Subject Land
- Main Road
- Road

--- Path/Track

**Vegetation Zone**

- PCT163 - VZ6
- PCT164 - VZ1

- PCT164 - VZ2
- PCT164 - VZ3
- PCT164 - VZ4
- PCT164 - VZ5



Coordinate System:  
GDA 1994 MGA Zone 54  
Date: 19/12/2025  
Created By: VN  
Drawing Size: A3  
0 200 400m

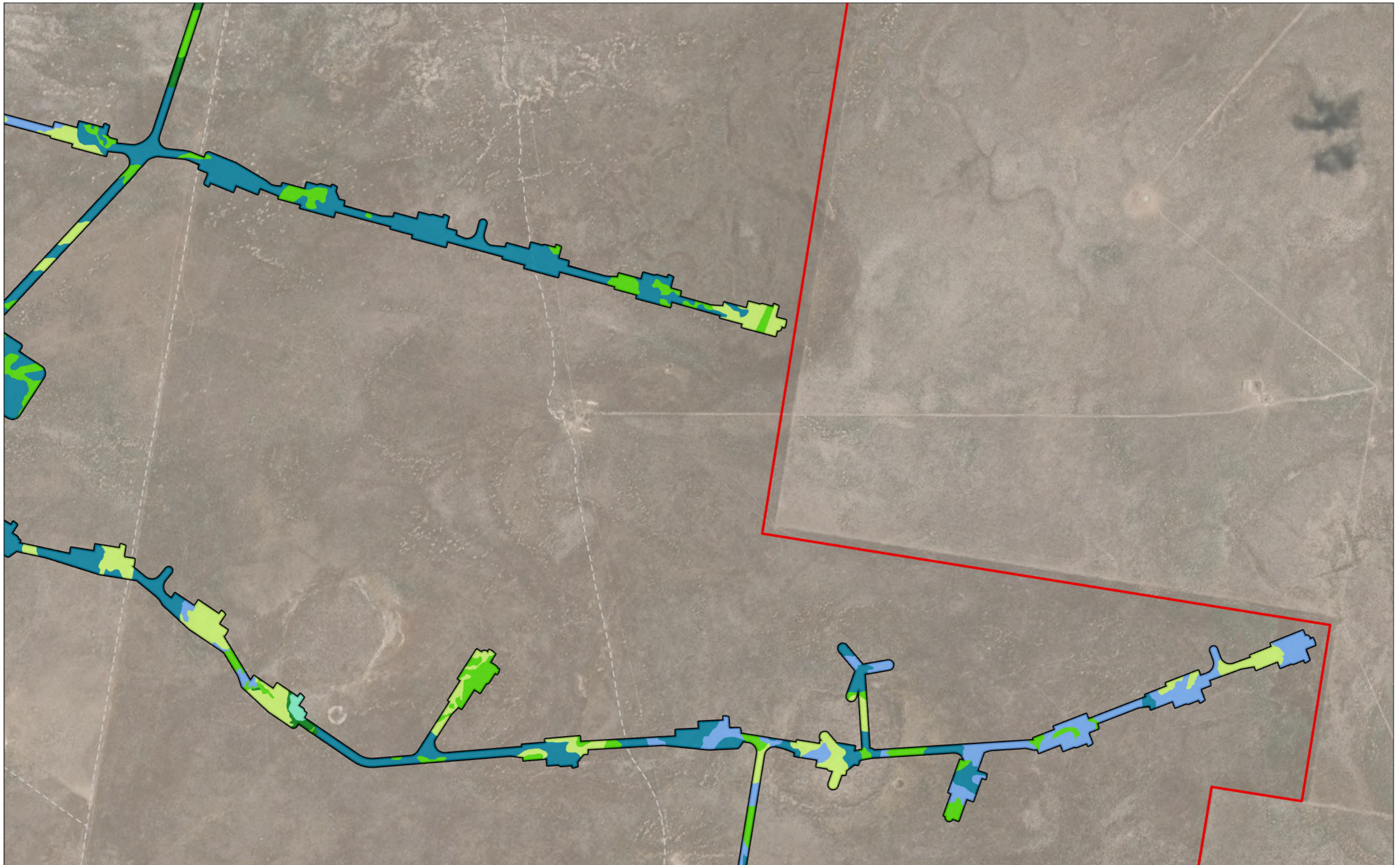


1:15,000

**F6-1 Vegetation Zones within the Subject Land  
Map 3 of 9**

**Keri Keri Windfarm  
Amendment Report**  
Acciona





**Legend**

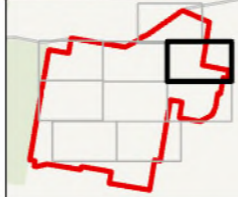
- Project Area
- Subject Land
- Main Road
- Road

--- Path/Track

**Vegetation Zone**

- PCT163 - VZ6
- PCT164 - VZ1

- PCT164 - VZ2
- PCT164 - VZ3
- PCT164 - VZ4
- PCT164 - VZ5



Coordinate System:  
GDA 1994 MGA Zone 54  
Date: 19/12/2025  
Created By: VN  
Drawing Size: A3  
0 200 400m

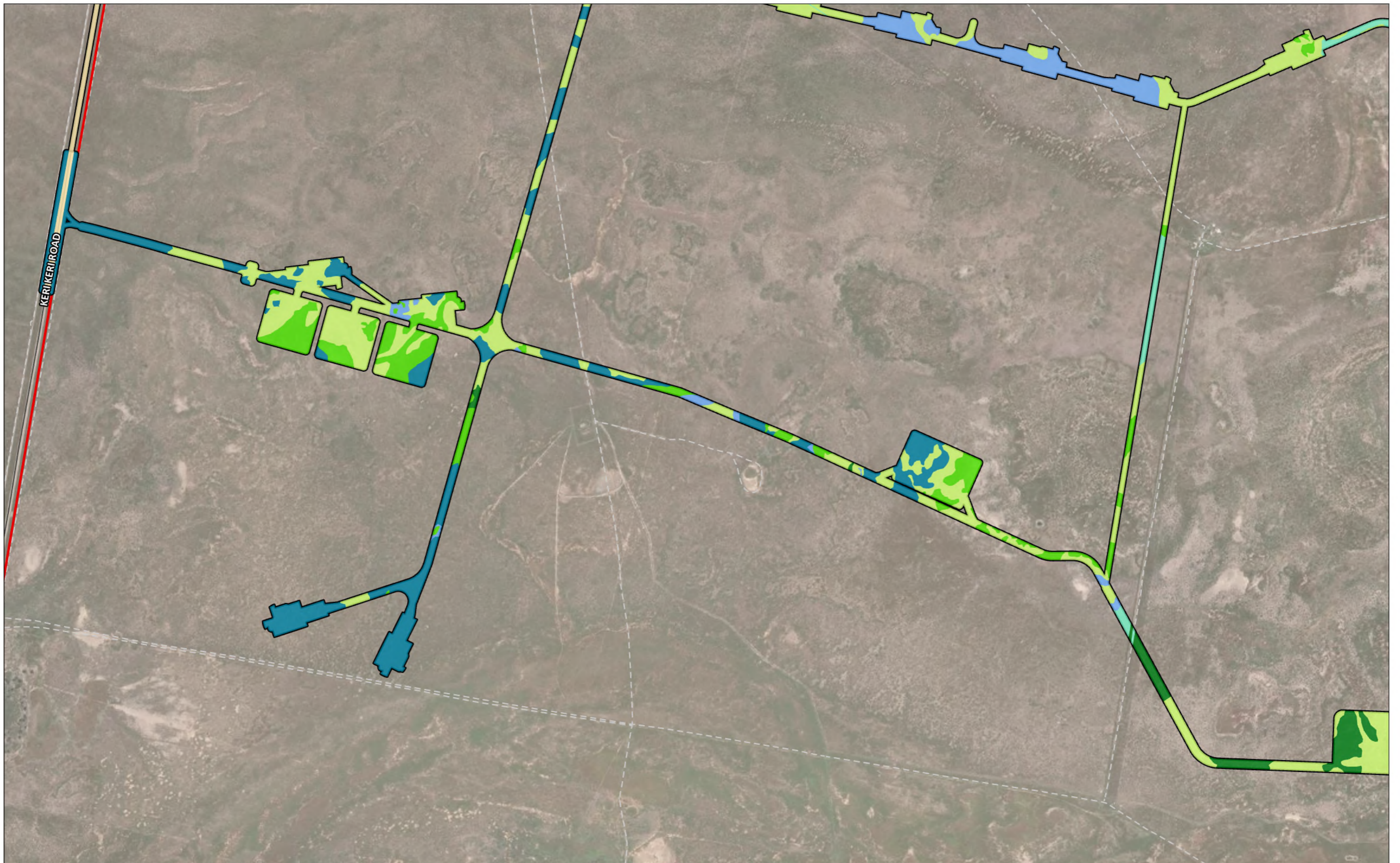


1:15,000

**F6-1 Vegetation Zones within the Subject Land  
Map 4 of 9**

**Keri Keri Windfarm  
Amendment Report**  
Acciona

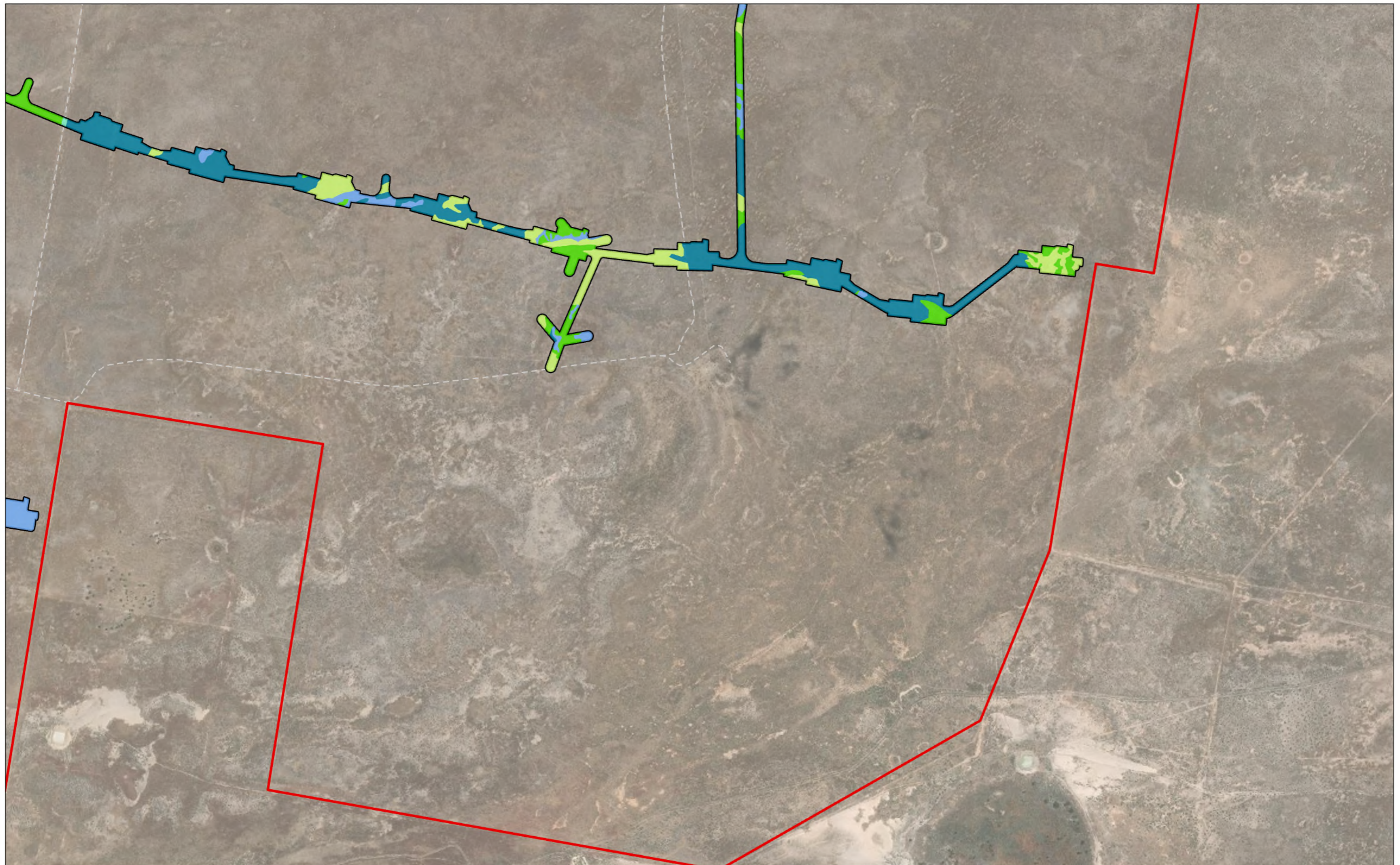




<p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid red; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Project Area</li> <li><span style="border: 1px solid black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Subject Land</li> <li><span style="border-bottom: 1px solid black; width: 15px; margin-right: 5px;"></span> Main Road</li> <li><span style="border-bottom: 1px solid gray; width: 15px; margin-right: 5px;"></span> Road</li> <li><span style="border-bottom: 1px dashed gray; width: 15px; margin-right: 5px;"></span> Path/Track</li> </ul>	<p><b>Vegetation Zone</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #008000; margin-right: 5px;"></span> PCT163 - VZ6</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #90EE90; margin-right: 5px;"></span> PCT164 - VZ1</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #32CD32; margin-right: 5px;"></span> PCT164 - VZ2</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #40E0D0; margin-right: 5px;"></span> PCT164 - VZ3</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #008080; margin-right: 5px;"></span> PCT164 - VZ4</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #6495ED; margin-right: 5px;"></span> PCT164 - VZ5</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: #FFD700; margin-right: 5px;"></span> Non-native Vegetation</li> </ul>		<p>Coordinate System: GDA 1994 MGA Zone 54</p> <p>Date: 19/12/2025</p> <p>Created By: VN</p> <p>Drawing Size: A3</p> <p>0 200 400m</p>	<p style="text-align: center;"><b>F6-1 Vegetation Zones within the Subject Land</b> <b>Map 5 of 9</b></p> <p style="text-align: center;"><b>Keri Keri Windfarm</b> <b>Amendment Report</b> Acciona</p> <div style="text-align: right;"> <span style="font-size: 24px; font-weight: bold; vertical-align: middle;">ERM</span> </div>
---	--	---	--	--	---



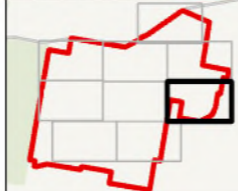
<p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid red; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Project Area</li> <li><span style="border: 1px solid black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Subject Land</li> <li><span style="border-bottom: 1px solid black; width: 15px; margin-right: 5px;"></span> Main Road</li> <li><span style="border-bottom: 1px solid black; width: 15px; margin-right: 5px;"></span> Road</li> </ul>	<p>--- Path/Track</p> <p><b>Vegetation Zone</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: darkgreen; margin-right: 5px;"></span> PCT163 - VZ6</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: lightgreen; margin-right: 5px;"></span> PCT164 - VZ1</li> </ul>	<ul style="list-style-type: none"> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: green; margin-right: 5px;"></span> PCT164 - VZ2</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: cyan; margin-right: 5px;"></span> PCT164 - VZ3</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: blue; margin-right: 5px;"></span> PCT164 - VZ4</li> <li><span style="display: inline-block; width: 15px; height: 10px; background-color: lightblue; margin-right: 5px;"></span> PCT164 - VZ5</li> </ul>		<p>Coordinate System: GDA 1994 MGA Zone 54</p> <p>Date: 19/12/2025</p> <p>Created By: VN</p> <p>Drawing Size: A3</p> <p>0 200 400m</p> <p>1:15,000</p>	<p><b>F6-1 Vegetation Zones within the Subject Land</b> <b>Map 6 of 9</b></p> <p><b>Keri Keri Windfarm</b> <b>Amendment Report</b> Acciona</p>
--	---	--	--	--	--



**Legend**  
 Project Area  
 Subject Land  
 Main Road  
 Road

--- Path/Track  
**Vegetation Zone**  
 PCT164 - VZ1  
 PCT164 - VZ2

PCT164 - VZ3  
 PCT164 - VZ4  
 PCT164 - VZ5



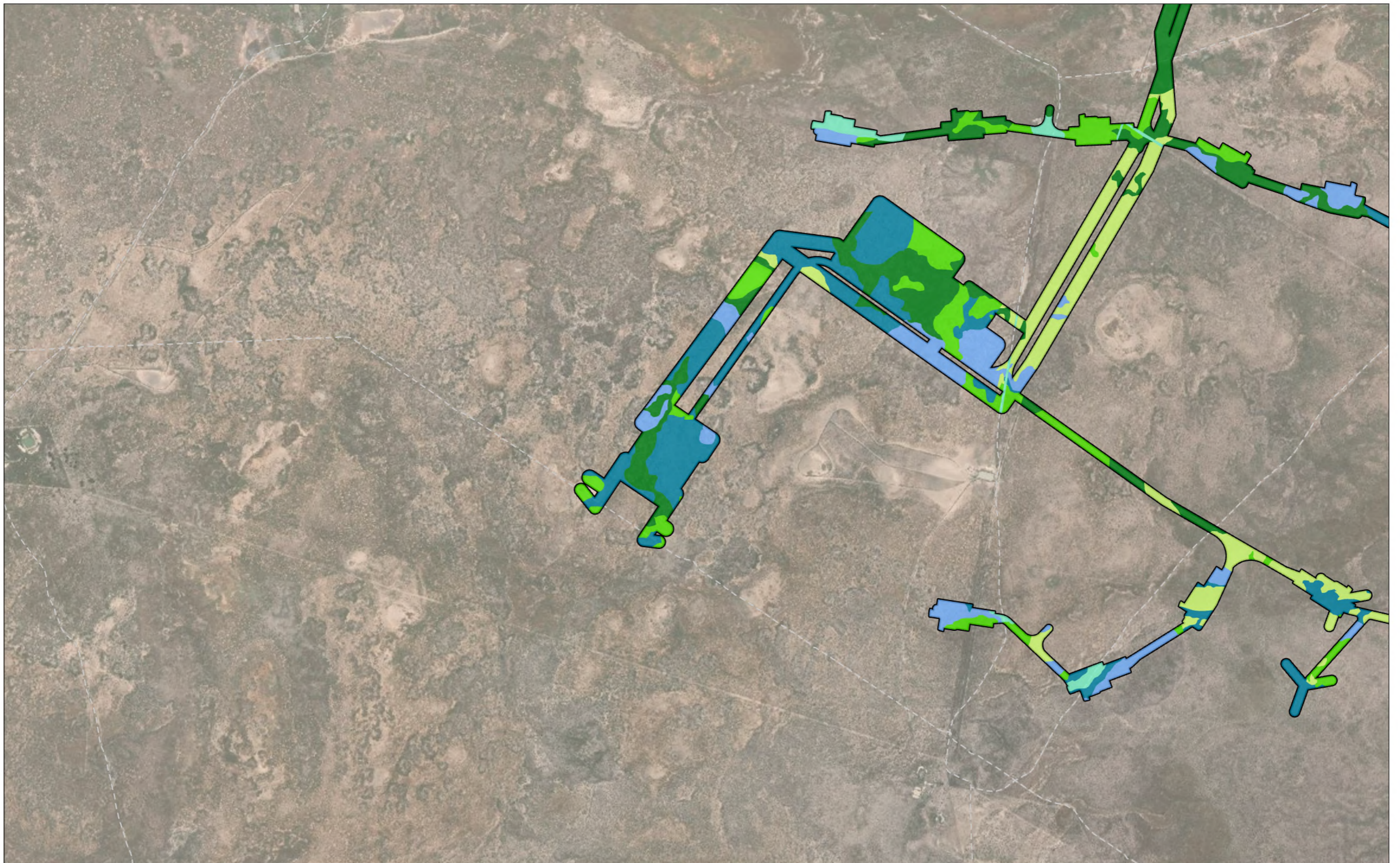
Coordinate System:  
 GDA 1994 MGA Zone 54  
 Date: 19/12/2025  
 Created By: VN  
 Drawing Size: A3  
 0 200 400m



**F6-1 Vegetation Zones within the Subject Land  
 Map 7 of 9**

**Keri Keri Windfarm  
 Amendment Report**  
 Acciona





**Legend**

- Project Area
- Subject Land
- Main Road
- Road

--- Path/Track

**Vegetation Zone**

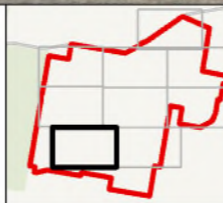
- PCT163 - VZ6
- PCT164 - VZ1

PCT164 - VZ2

PCT164 - VZ3

PCT164 - VZ4

PCT164 - VZ5



Coordinate System:  
GDA 1994 MGA Zone 54  
Date: 19/12/2025  
Created By: VN  
Drawing Size: A3  
0 200 400m



1:15,000

**F6-1 Vegetation Zones within the Subject Land  
Map 8 of 9**

**Keri Keri Windfarm  
Amendment Report**  
Acciona

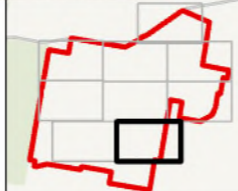




**Legend**  
 [Red outline] Project Area  
 [Black outline] Subject Land  
 [Thick line] Main Road  
 [Thin line] Road

--- Path/Track  
**Vegetation Zone**  
 [Dark Green] PCT163 - VZ6  
 [Light Green] PCT164 - VZ1

[Bright Green] PCT164 - VZ2  
 [Dark Blue] PCT164 - VZ4  
 [Light Blue] PCT164 - VZ5



Coordinate System:  
 GDA 1994 MGA Zone 54  
 Date: 19/12/2025  
 Created By: VN  
 Drawing Size: A3  
 0 200 400m



1:15,000

**F6-1 Vegetation Zones within the Subject Land  
 Map 9 of 9**

**Keri Keri Windfarm  
 Amendment Report**  
 Acciona



## 6.2 ABORIGINAL CULTURAL HERITAGE

### 6.2.1 BACKGROUND

The Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared for the EIS (ERM, 2024a) has been updated to assess potential impacts to Aboriginal cultural heritage associated with the amended Project (Amended ACHAR; Appendix E). The Amended ACHAR includes updates, as necessary, in response to matters raised in submissions received for the EIS.

Amendments relevant to potential impacts to Aboriginal cultural heritage include:

- Reduction of the temporary Disturbance Footprint from 1,137 ha to up to 764 ha;
- Revised Project Area to remove two site access points;
- Removal of 41 WTGs;
- Micro-siting (moved <100 m) of 57 WTGs;
- Relocation (moved >100m) of 6 WTGs; and
- Change of location and revision of numbers for the ancillary infrastructure such as the BESS and substations.

The amendments to the Project layout were largely to avoid landforms associated with cultural heritage sensitivity and conserve the most culturally important sites recorded during the Aboriginal cultural heritage assessment.

The Amended ACHAR was prepared in accordance with:

- 'Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW, 2010a);
- 'Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW' (DECCW, 2010b);
- 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW' (OEH, 2011);
- 'The Australia International Council on Monuments and Sites, Charter for Places of Cultural Significance' (ICOMOS, 2013); and
- NPWS Guidelines (NSW DPIE, 2020).

Additional engagement with Registered Aboriginal Parties (RAPs) was warranted due to revisions made to the ACHAR to address submissions raised by Heritage NSW, and to assess the amended Project. The revised ACHAR was provided to the RAPs in December 2024 (via email) and again in October 2025 (via email) for review. No additional comments or feedback was received from the RAPs.

The Applicant has also engaged more broadly with the Aboriginal community to discuss test excavation and appropriate management and mitigation measures (Appendix C and Appendix R of the Amended ACHAR). The consensus from the Aboriginal community was to avoid or delay test excavation until impacts on Aboriginal cultural heritage sites were certain. As a result, no test excavations have been undertaken.

### 6.2.2 IMPACT ASSESSMENT

#### 6.2.2.1 PROJECT AREA

The amended Project layout has conserved the most culturally and scientifically significant Aboriginal cultural heritage sites recorded within the Project Area. The amendments to the

project mean that only one recorded Aboriginal cultural heritage site will be directly impacted by Project activities.

During Aboriginal cultural heritage surveys undertaken for the Project, 209 new sites were recorded in the Project Area. Of these, site KK-046 (an isolated artefact) may be directly impacted.

The micro-siting corridor of the amended Project also overlaps 23 Aboriginal cultural heritage sites. These include isolated or small numbers of artefacts and hearth stones. Despite these sites being within the Project's Disturbance Footprint, impacts from Project activities should be able to be avoided. Another 19 sites are within 50 m of the micro-siting corridor. These also consist of isolated or small numbers of artefacts or hearth stones.

In amending the Project, the Applicant has reduced the number of recorded sites that may be subject to direct impacts from the Project from 13 to one (KK-046). Similarly, the number of sites within the micro-siting corridor that may be subject to potential impact has reduced from 74 to 23.

This reflects a focus by the Applicant to avoid or minimise impacts on Aboriginal cultural heritage. Recorded sites within the broader Project Area will remain to illustrate the significant Aboriginal cultural heritage of the area and allow the Aboriginal community to educate others about their history and culture.

As necessary, mitigation and management measures have been updated to further avoid and minimise impacts to identified Aboriginal cultural heritage Sites. This is discussed further in Section 6.2.3.

#### 6.2.2.2 TRANSPORT ROUTE

An Aboriginal Cultural Heritage Due Diligence Assessment (ACHDDA) was undertaken to assess the road upgrades required along the transport route proposed for the Project (refer to Appendix I). The ACHDDA was informed by an Updated Traffic and Transport Assessment (Appendix I).

Four locations along the transport route will require upgrades to facilitate transport of project components, primarily the WTG blades.

The key findings of the ACHDDA include:

- Two previously recorded Aboriginal heritage sites (AHIMS # 47-6-0058 and AHIMS # 47-6-0015) are in the vicinity of the upgrade required at Balranald (Pinch Point 02); however, these sites are not within the Disturbance Footprint of Pinch Point 02, which has been significantly disturbed (e.g., by the construction of a network of roads) and, therefore, there is unlikely to be archaeologically sensitive material within the Disturbance Footprint; and
- There are no previously recorded Aboriginal heritage sites within or near the remaining locations that require upgrades, and these locations are unlikely to contain archaeologically sensitive material given they have been extensively disturbed by past activities.

### 6.2.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation and management measures have been updated to avoid or minimise impacts on Aboriginal cultural heritage during construction of the Project, including upgrades required along the transport route.

The Aboriginal cultural heritage values identified within the Project Area can be appropriately managed by implementing these measures, as summarised below:

- Micro-siting of project elements will be implemented as the primary mitigation measure to avoid disturbing all recorded Aboriginal cultural heritage sites and any that may be found during construction or operation. Micro-siting should occur within the boundary of the area previously surveyed wherever possible. If micro-siting was to occur within any areas that have not been previously surveyed, additional precautions should be undertaken as directed by the ACHMP (see point below);
- The Applicant will develop an Aboriginal Cultural Heritage Management Plan (ACHMP) to be approved by the Planning Secretary. The ACHMP will be developed in consultation with Traditional Owners and Heritage NSW and will include procedures for the long-term management of artefacts and an Unexpected Finds Protocol;
- The Applicant will continue to liaise with the Project landowners and Traditional Owners to develop appropriate stock management strategies to limit further disturbance to Aboriginal cultural heritage sites;
- The Applicant will consider appointing and training a Traditional Owner Liaison to appropriately coordinate access for staff and contractors to culturally sensitive areas and provide cultural awareness training; and
- The Applicant will consider working with the Traditional Owners to develop and implement additional research opportunities that would extend the understanding of the Aboriginal heritage values within the Project Area beyond the Disturbance Footprint and place them in context of the broader cultural landscape of the Plains region, and the internationally significant story of this area and its connection to the Willandra Lakes and Lake Mungo.

The following mitigation measures are proposed to avoid impacts to Aboriginal cultural heritage at locations where road upgrades are required along the transport routes:

- Cultural Awareness Induction: All personnel involved with construction activities that involve ground disturbance are to undertake a cultural awareness induction, which will include identification of potential Aboriginal cultural heritage objects, identification of historic heritage finds, and implementation of the Unexpected Finds Protocol; and
- Unexpected Finds Protocol: If suspected Aboriginal or historic heritage objects or items are found, the Unexpected Finds Protocol provided in the ACHMP must be followed.

## 6.3 NOISE AND VIBRATION

### 6.3.1 BACKGROUND

The Noise and Vibration Impact Assessment (NVIA) prepared for the EIS (ERM, 2024b) has been updated to assess impacts relevant to the amended Project and, as necessary, address matters raised in submissions (Amended NVIA, Appendix G).

Amendments to the Project that are relevant to the Amended NVIA include:

- Reduction of WTGs from 155 to 114; and
- Micro-siting of 57 WTGs and relocation of six WTGs to increase the distance from sensitive receptors.

In addition to aspects assessed in the NVIA prepared to inform the EIS, the Amended NVIA includes:

- Assessment of a representative receptor on the Yanga SCA boundary;
- Updated mitigation measures to reduce noise impacts in the Yanga SCA to below 40dB(A) at the boundary; and
- Conservatively applying a base noise limit criterion of 35 dB(A).

The Amended NVIA was prepared in accordance with:

- 'Interim Construction Noise Guideline 2009' (ICNG) (NSW ICNG, 2009);
- 'South Australia (SA) Environment Protection Authority's (EPA's) Wind Farms Environmental Noise Guidelines' (SA EPA, 2021);
- 'NSW DPHI Wind Energy Guideline, Technical Supplement for Noise Assessment' (the Technical Supplement) (DPHI, 2024);
- 'Noise Policy for Industry' (NPI) (EPA, 2017);
- 'NSW Road Noise Policy' (DECCW, 2011);
- 'NSW Assessing Vibration: A Technical Guideline' (AVTG) (DECC, 2006); and
- NPWS Guidelines (NSW DPIE, 2020).

### 6.3.2 IMPACT ASSESSMENT

Noise from the amended layout of 114 WTGs was modelled assuming a hub height of 179 m and a maximum sound power level of 108.9 A-weighted decibels (dB(A)) as per the proposed wind turbine model.

The worst-case predicted wind turbine noise levels at the nearest non-associated dwellings were assessed against the Technical Supplement (DPHI, 2024) and no exceedances were observed.

#### 6.3.2.1 NOISE CRITERIA

The Technical Supplement (DPHI, 2024) provides a framework for the assessment of operational noise generated by WTGs and other Project infrastructure. The assessment includes modelling to determine operational noise levels at non-associated dwellings in the vicinity of the Project. A conservative operational noise threshold of 35 dB(A) has been adopted for non-associated dwellings.

The ICNG (2009) sets project-specific noise management levels for works undertaken within recommended standard hours for construction. These apply to all identified residential receivers (associated and non-associated). The noise management levels specified in the EIS also apply to the amended Project.

Assessment of Project-specific noise needs to consider intrusive noise levels, amenity noise levels, and sleep disturbance noise levels. Collectively these set the Project noise trigger levels (PNTLs). The PTNLs specified in the EIS also apply to the amended Project.

The RNP specifies noise criteria for construction traffic that are required to be achieved at residential dwellings along the transport route and adjacent to the Project Area. The road traffic noise assessment criteria specified in the EIS for residential dwellings also applies to the amended Project.

#### 6.3.2.2 BACKGROUND NOISE MONITORING

Background noise monitoring was conducted at four locations to establish the ambient noise environment of the area surrounding the Project. Monitoring data was used to establish Project-specific criteria.

#### 6.3.2.3 OPERATIONAL NOISE IMPACT

Modelling of operational noise from the amended Project layout demonstrates that there will be no exceedance of the 35 dB(A) criteria at any residential dwelling. The highest predicted noise level at associated receivers is 25 dB(A) (receivers R93 and R62), which are located about 6.5 km from the nearest WTG. The highest predicted noise level at non-associated receivers is 34 dB(A) (receivers R19 and R99), which are located about 2.4 km from the nearest WTG. A noise contour map showing noise propagation from the Project WTGs is provided in Figure 6-2. Additionally, noise levels at the nearby Yanga SCA are predicted to be below 16 dB(A), which complies with the relevant noise criteria. Therefore, no adverse noise impacts are expected within Yanga SCA.

#### Low Frequency Noise

Low-frequency noise is not a significant characteristic of modern wind turbine noise; however, a detailed assessment of low-frequency noise was undertaken as part of the Amended NVIA, in accordance with the Technical Supplement (DPHI, 2024) and the NPI (EPA, 2017). The Amended NVIA concluded that there will be no low frequency noise impact at any residential receiver.

#### 6.3.2.4 CONSTRUCTION NOISE IMPACTS

The amended Project does not change the assessment outcomes for construction noise as detailed in the EIS. A noise management plan is not required as construction noise will not exceed relevant noise criteria.

#### 6.3.2.5 TRAFFIC NOISE IMPACTS

The amended Project does not change the assessment outcomes for traffic noise as detailed in the EIS.

### 6.3.2.6 VIBRATION IMPACTS

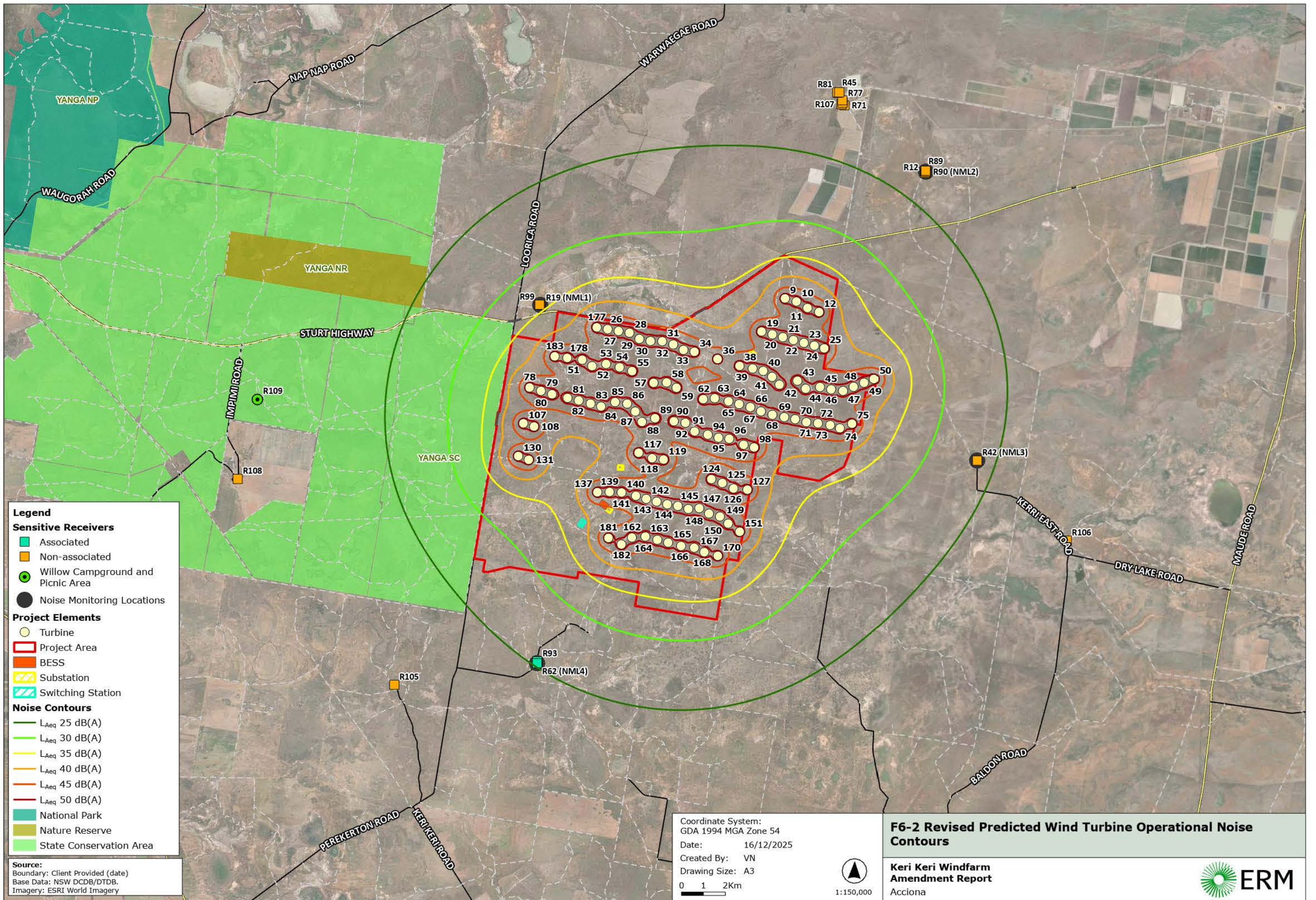
The amended Project does not change the assessment outcomes for vibration impacts as detailed in the EIS.

### 6.3.2.7 CUMULATIVE NOISE IMPACTS

Cumulative noise impacts were reassessed to ensure that the amended Project in conjunction with other relevant developments would not exceed acceptable noise levels. Cumulative noise impacts relevant to the amended Project remain consistent with those presented in the EIS.

### 6.3.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation measures proposed in the EIS are appropriate to mitigate potential noise impacts in Yanga SCA (i.e., ensure noise levels do not exceed 40 dB(A) as per the submission received from NPWS). The amended Project does not necessitate any additional mitigation measures. Those proposed in the EIS will be adequate to mitigate and manage the potential for noise and vibration resulting from the amended Project.



**Legend**

**Sensitive Receivers**

- Associated (Green square)
- Non-associated (Orange square)
- Willow Campground and Picnic Area (Green circle)
- Noise Monitoring Locations (Black circle)

**Project Elements**

- Turbine (Yellow circle)
- Project Area (Red outline)
- BESS (Orange outline)
- Substation (Yellow hatched area)
- Switching Station (Blue hatched area)

**Noise Contours**

- $L_{Aeq}$  25 dB(A) (Green line)
- $L_{Aeq}$  30 dB(A) (Light Green line)
- $L_{Aeq}$  35 dB(A) (Yellow line)
- $L_{Aeq}$  40 dB(A) (Orange line)
- $L_{Aeq}$  45 dB(A) (Dark Orange line)
- $L_{Aeq}$  50 dB(A) (Red line)

**Other Features**

- National Park (Teal area)
- Nature Reserve (Brown area)
- State Conservation Area (Light Green area)

**Source:**  
 Boundary: Client Provided (date)  
 Base Data: NSW DCDB/DTDB.  
 Imagery: ESRI World Imagery

Coordinate System:  
 GDA 1994 MGA Zone 54  
 Date: 16/12/2025  
 Created By: VN  
 Drawing Size: A3  
 0 1 2Km  
 1:150,000

**F6-2 Revised Predicted Wind Turbine Operational Noise Contours**

**Keri Keri Windfarm  
 Amendment Report**  
 Acciona



## 6.4 TRAFFIC AND TRANSPORT

### 6.4.1 BACKGROUND

The Traffic and Transport Impact Assessment (TTIA) prepared for the EIS (TTPP, 2024) has been updated to assess potential impacts relating to transport and traffic associated with the amended Project (Updated TTIA; Appendix I). The Updated TTIA has also been revised, as necessary, in response to relevant matters raised in submissions received for the EIS.

Proposed amendments relevant to the Updated TTIA are:

- Reduced number of WTGs from up to 155 to 114 WTGs (-41 WTGs);
- Reduced construction period from an anticipated 24 months to 18 months (- 6 months);
- Reduction in the number of site access points from four to two (one on Keri Keri Road and one on Sturt Highway); and
- Removal of the Port of Newcastle for importation of Project components and, therefore, a reduction in the number of road upgrades required.

The Updated TTIA was prepared in accordance with:

- 'Guide to Traffic Generating Developments' (RTA, 2002);
- 'Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections' (Austroads, 2021);
- 'Austroads Guide to Traffic Management Part 3: Traffic Studies and Analysis' (Austroads, 2020); and
- 'Austroads Guide to Traffic Management Part 6: Intersections, Interchanges, and Crossings' (Austroads, 2019).

### 6.4.2 IMPACT ASSESSMENT

#### 6.4.2.1 TRAFFIC VOLUMES AND ROAD NETWORK CAPACITY

The geometric assessment of the transport route alternatives has demonstrated that routes can satisfactorily accommodate the swept path movements of the proposed construction vehicle types albeit with the need to adjust road infrastructure and intersection layouts / furniture at four locations.

The assessment of the road network operation demonstrated that the road network on the transport routes has sufficient capacity to accommodate the peak construction traffic generation of the amended Project.

An amended assessment for all construction vehicle traffic volumes and vehicle types for each public and private access to the state road network was undertaken, including:

- AM/PM construction traffic volumes for worst case scenario at each public and private access;
- Background traffic volumes measured in AM/PM network peaks, annual growth applied to peak construction and accumulative traffic volumes for AM/PM peak traffic hours of any significant projects (i.e., cumulative impacts); and
- Inputs for turn warrant assessment/s for each public and private access to the state road network.

A mid-block capacity assessment was used to assess the impact of the Project on road capacity and performance. The assessment demonstrates that the Sturt Highway would operate at Level of Service A (LoS A)<sup>1</sup> during peak construction. This suggests that the capacity of the Sturt Highway would not be adversely impacted by the Project.

Traffic flows along Keri Keri Road are low (0 - 1 vehicles/hour surveyed in peak periods). However, the use of Keri Keri Road for construction access (up to 93 vehicles/hour in peak) represents a LoS A.

#### 6.4.2.2 SITE ACCESS

A review of driver sight distances at each of the site access points was undertaken. Design speeds for the Sturt Highway access and the Sturt Highway / Keri Keri Road intersection are 120 km/h (+10 km/h on the posted speed limit). Design speeds for the Keri Keri Road access are 80 km/h.

For the Sturt Highway access and the Sturt Highway / Keri Keri Road intersection the maximum safe intersection sight distance (SISD) is 324 m (refer Table 6-5). The available sight distances exceed 500 m at both locations and in both directions. Similarly, the SISD for Keri Keri Road access point is 181 m and the available sight distance exceeds this. As such the available sight distances at the Project access points comply with the minimum Austroad SISD requirements.

**TABLE 6-5 REQUIRED DRIVER SIGHT DISTANCE AT SITE ACCESSES**

Design Speed (km/h)	SISD (m)
<b>80</b>	<b>181</b>
90	214
100	248
110	285
<b>120</b>	<b>324</b>

#### 6.4.2.3 TURN WARRANTS

The turn warrant assessments were undertaken for:

- Sturt Highway / Site Access (new intersection); and
- Sturt Highway / Keri Keri Road / Loorica Road intersection (existing intersection).

For both the Sturt Highway / Keri Keri Road / Loorica Road intersection, and the site access point on the Sturt Highway, based on Project peak construction traffic generation plus cumulative development traffic, warrants for a Channelised Right Turn Lane (short) (CHRs) are met. A formal Basic Left Treatment (BAL) was also determined to be satisfactory for these locations.

<sup>1</sup> LOS A is a condition of free flow in which individual drivers are virtually unaffected by the presence of others in the traffic stream. Freedom to select desired speeds and to manoeuvre within the traffic stream is extremely high, and the general level of comfort and convenience provided is excellent.

SIDRA modelling to assess the capacity of site access points concluded that site access points would perform acceptably with the peak construction traffic from the Project and cumulative traffic generation associated with other developments.

#### 6.4.2.4 OSOM TEMPORARY INTERSECTION TREATMENTS

The Transport Route Assessment has been updated to consider the amended Project (Appendix B of Appendix I) and the updated transport route is shown in Figure 6-3. The Applicant has decided to remove the Port of Newcastle as an option for the import of Project components. As such, the transport route from the Port of Newcastle is no longer being considered, which significantly reduces the road upgrades required to facilitate transport of Project components to the site.

The Port of Adelaide will be retained as an import port and, therefore, the transport route has been assessed from where that route meets the NSW border – at Euston. Four locations along the transport route in NSW were identified (through swept path analysis) as requiring upgrades to facilitate the movement of oversize overmass (OSOM) vehicles. Strategic designs for these upgrades have been provided (Appendix E of Appendix H).

#### 6.4.2.5 ON SITE CARPARKING AND WORKFORCE ACCOMMODATION

Car parking required for vehicles associated with the construction and operation of the Project will be wholly accommodated on-site.

The Updated TIA also includes more detail regarding the workforce accommodation, specifically:

- The workforce accommodation rosters, shifts and mode share along with traffic generation for AM and PM peaks during peak construction;
- A turn warrant assessment for peak construction traffic generation scenarios with consideration of background growth and cumulative traffic from other developments; and
- Worst case scenario associated with Project generated traffic during peak construction.



### 6.4.3 UPDATED MITIGATION AND MANAGEMENT

In addition to the traffic mitigation and management measures presented in the EIS, the transport route assessment (Appendix B of Appendix I) has been updated to manage impacts on other road users, measures include:

- OSOM vehicle movements from the Port of Newcastle have been removed from the amended Project; and
- OSOM will access the site from the west through Balranald.

Further details of managing impacts on other road users will be provided in a Traffic and Transport Management Plan (TTMP). The requirements of the TTMP are specified in the Updated TTIA and will be included in the Conditions of Consent for the Project.

With consideration and implementation of the key mitigation measures outlined in the EIS and the Amended TIA, it is considered that the construction and operation of the Project can be undertaken without significant adverse impacts to the operation, capacity or safety of the surrounding road network

## 6.5 LANDSCAPE AND VISUAL

### 6.5.1 BACKGROUND

The Landscape and Visual Impact Assessment (LVIA) prepared for the EIS (Moir, 2024) has been updated to assess potential impacts to landscape and viewshed associated with the amended Project (Addendum LVIA; Appendix F). The Addendum LVIA also includes updates, as necessary, in response to matters raised in relevant submissions.

Project amendments relevant to potential landscape and visual impacts include:

- Reduction in number of WTGs from 155 to 114;
- Reduction of ancillary infrastructure, e.g., number of O&M facilities, met masts etc.; and
- Relocation of WTGs, ancillary infrastructure and temporary facilities.

The Addendum LVIA also includes:

- Further consideration of the impacts of night lighting on Yanga SCA;
- Consideration of the impact(s) of the amended Project on the visual environment at NSW National Parks and Wildlife Service (NPWS) staff accommodation, Oakhampton Cottage and Oakhampton Irrigation Cottage; and
- An updated shadow flicker assessment.

The Addendum LVIA was prepared in accordance with the:

- 'Wind Energy: Visual Assessment Bulletin' (NSW DPE, 2016);
- 'Wind Energy Guideline' (NSW DPHI, 2024); and
- NPWS Guidelines (NSW DPIE, 2020).

### 6.5.2 IMPACT ASSESSMENT

The reduction in WTGs associated with the amended Project has reduced the horizontal extent of visible infrastructure. Therefore, fewer WTGs are visible from residential dwellings and public viewpoints, particularly for the two non-associated dwellings (Dwelling 19 and Dwelling 99) identified in the LVIA as having a moderate visual impact rating. As such, the results presented in the LVIA should be considered conservative.

#### 6.5.2.1 NIGHT LIGHTING

##### **Aviation Lighting**

The LVIA was informed by the Aviation Impact Assessment (AIA; (Aviation Projects, 2024)) prepared to inform the EIS, which determined that obstacle lighting on WTGs was not required for the Project. However, the agency advice provided by the Civil Aviation Safety Authority (CASA) recommended that obstacle lighting be installed on the nacelle of WTGs. The Amended AIA recognises CASAs submission and has recommended that a lighting plan be developed in accordance with the 'NASF Guideline D'. The lighting plan would identify which WTGs require obstacle lighting.

Aviation obstacle lighting is designed to ensure visibility for aircraft rather than observers at ground-level. This focus on airspace visibility aligns with regulatory safety requirements and minimises unnecessary light spill or pollution toward the ground.

While it is acknowledged that light spill and glow can extend beyond the immediate area of the light source, the intensity of these effects diminishes rapidly with distance.

The amended Project layout has resulted in a minimum 1.2 km setback from the eastern boundary of the Yanga SCA. As per the LVIA, a 1.2 km setback will result in only 5% of the nominal light intensity being visible within Yanga SCA. Based on this, no significant lighting impacts resulting from aviation lighting are anticipated at the Yanga SCA.

Prior to construction, a lighting plan will be prepared in accordance with National Airports Safeguarding Framework (NASF) Guideline D and in consultation with CASA. This lighting plan will identify which WTGs will require obstacle lighting, as it is expected that not all WTGs will require obstacle lighting.

### **Ancillary Lighting**

Lighting will be required at the temporary workforce accommodation camp, construction compound and other temporary elements of the Project. These temporary facilities have been sited such that they are a considerable distance to receivers that may be impacted by light pollution.

Similarly, lighting will be required at permanent infrastructure such as the O&M, substation, switching yard, and security facilities. These facilities are located at least 5 km from the Yanga SCA and from residential dwellings. The light sources at these facilities will be low-candela lighting; there will be no permanently illuminated lighting installed. Lighting will be temporary, intermittent (like motion-activated lights), or turned on and off as needed.

Although, light pollution at the Yanga SCA is unexpected, the Applicant will implement measures to further avoid light spill, including that lighting will be designed to comply with the requirements of the 'Australian Standard 4282: Control of Obtrusive Effects of Outdoor Lighting' (Standards Australia, 2023) and the 'National Light Pollution Guidelines for Wildlife' (DCCEEW, 2023).

The Project does not fall within the Dark Sky Region; however, the Applicant will also consider the recommended lighting practices outlined in the 'NSW Dark Sky Planning Guidelines' (NSW DPE, 2023) during the detailed design phase of the Project.

#### **6.5.2.2 OAKHAMPTON COTTAGE AND OAKHAMPTON IRRIGATION COTTAGE**

The NPWS has accommodation for staff appointed to manage the Yanga National Park and SCA. These facilities, Oakhampton Cottage and Oakhampton Irrigation Cottage, are over 15 km from the Project boundary. At this distance, especially considering intervening vegetation surrounding the Project Area, the potential visual impact has been assessed as negligible.

#### **6.5.2.3 UPDATED SHADOW FLICKER ASSESSMENT**

The assessment of shadow flicker has been updated to consider the amended Project. The amended Project layout provides a 1.2 km buffer between Project WTGs and the Yanga SCA. The updated shadow flicker assessment is shown in Figure 6-4 and demonstrates that shadow flicker will not influence Yanga SCA.

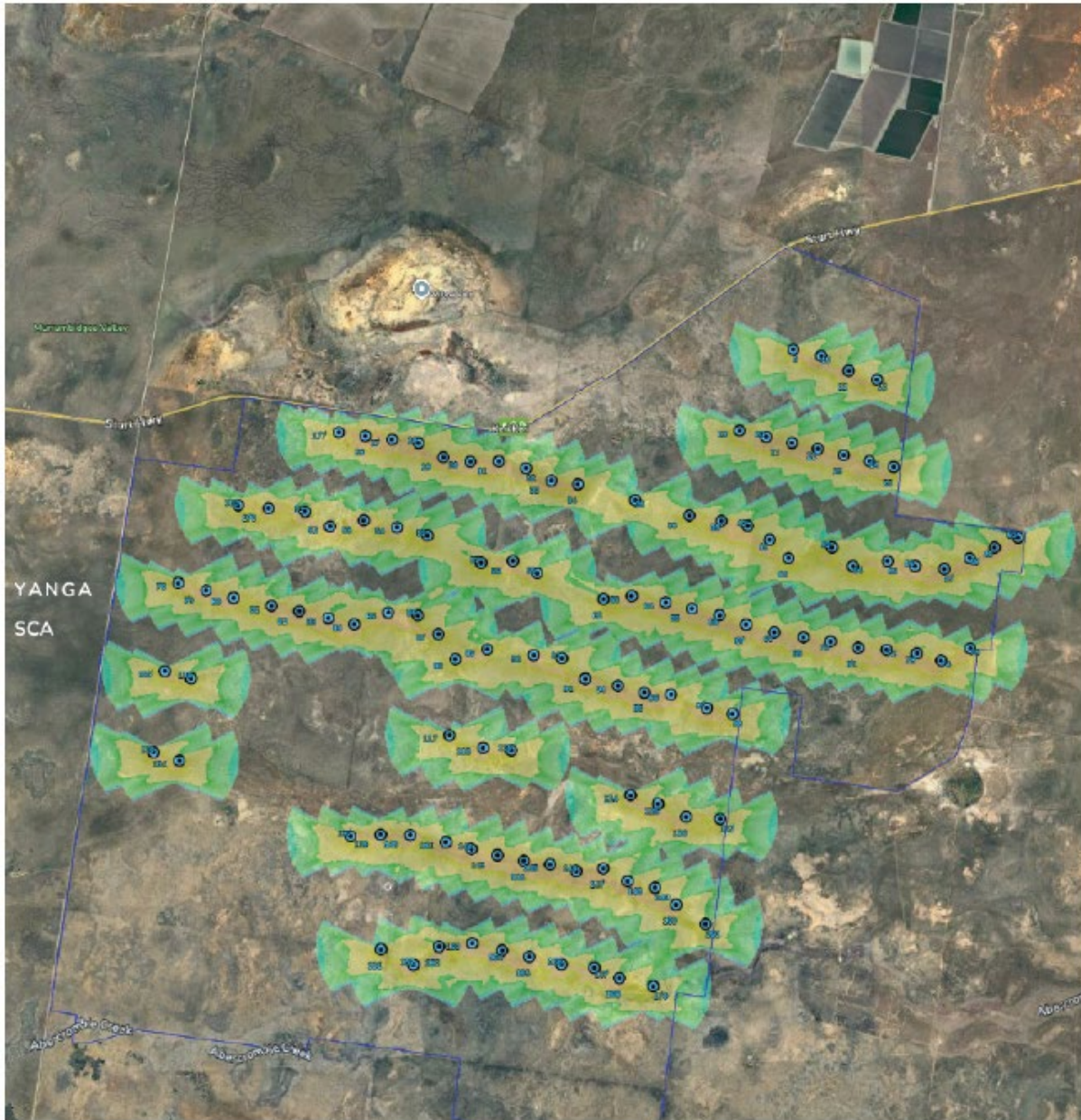
### 6.5.3 UPDATED MITIGATION AND MANAGEMENT

The amended Project has resulted in reduced visual impacts. Specifically, the reduction in the number of WTGs has decreased the horizontal extent of visible infrastructure, which has resulted in fewer WTGs being visible from key public viewpoints and residences.

Mitigation measures proposed in the EIS will, therefore, be adequate to mitigate and manage impacts to landscape character and viewshed. Additional measures proposed include:

- Lighting at permanent infrastructure compounds will in accordance with 'Australian Standard 4282: Control of Obtrusive Effects of Outdoor Lighting' (Standards Australia, 2023) and the 'National Light Pollution Guidelines for Wildlife' (DCCEEW, 2023); and
- If obstacle lighting is installed, shielding will be used to prevent light spill.

FIGURE 6-4 REVISED SHADOW FLICKER ASSESSMENT



Legend

	0.1 - <10.0 Hours
	10.0 - <30.0 Hours
	30.0 - <100.0 Hours
	100.0 - <500.0 Hours
	500.0 - <1,000.0 Hours
	1,000.0 - <=2,000.0 Hours



Shadow Flicker Assessment - Amended Project Layout  
 Basemap Source - Google Earth, 2025

## 6.6 AVIATION

### 6.6.1 BACKGROUND

The Aviation Impact Assessment (AIA) prepared for the EIS (Aviation Projects, 2024) has been updated to assess potential impacts on aviation and airspace from the amended Project (Amended AIA; Appendix J). The Amended AIA has also been revised, as necessary, to respond to relevant submissions.

Project amendments relevant to potential aviation impacts include:

- Reduction in the number of WTGs from 155 to 114;
- Micro-siting and relocation of WTGs;
- Optimisation of electrical reticulation; and
- Reduction in the number of permanent and temporary met masts from four to three.

The Amended AIA was prepared in accordance with:

- *Civil Aviation Regulations 1998 (CAR)*;
- *Civil Aviation Safety Regulations 1998 (CASR)*;
- 'National Airport Safeguarding Framework (NASF) Guideline D: Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers' (National Airports Safeguarding Advisory Group, 2012);
- Civil Aviation Safety Authority (CASA) advisory material including:
  - 'Guidelines for Aeroplanes with MTOW Not Exceeding 5,700 kg – Suitable Places to Take Off and Land' (CASA, 2022);
  - 'Operations in the Vicinity of Non-controlled Aerodromes' (CASA, 2025);
  - 'Reporting of Tall Structures' (CASA, 2021);
  - 'Obstacles (Including Wind Farms) Outside the Vicinity of a CASA Certified Aerodrome' (CASA, 2022);
- Other requirements as advised by Airservices Australia; and
- 'ISO 31000:2018 Risk Management – Guidelines'.

### 6.6.2 IMPACT ASSESSMENT

#### 6.6.2.1 BALRANALD AIRPORT

The amended Project does not impact on the nearest non-instrument-certified airport, Balranald Airport (YBRN), as the amended Project is located beyond the maximum horizontal extent of YBRN's obstacle limitation surfaces (up to 2.7 km for the conical surface and 1.6 km for the take-off and approach surfaces). As there is no instrument flight procedure at YBRN, no Procedures for Air Navigation Services – Aircraft Operations assessment was required.

#### 6.6.2.2 AIR ROUTES AND GRID LSALTS

##### **Grid LSALT**

An assessment of relevant airspace grid lowest safe altitude (LSALT) was undertaken for the highest WTGs of the amended Project. The Project spans across two Grid LSALTs horizontally,

referred to as 'left' and 'right'. The highest WTG in the left 1,800 ft Grid LSALT sector is about 360.2 m (1,181.7 ft above mean sea level (AMSL)), which is 381.7 ft higher than the 800 ft obstacle height limit (OHL). The highest WTG in the right 1,800 ft Grid LSALT sector is about 361.7 m (1,186.8 ft AMSL), which is 386.8 ft higher than the 800 ft OHL. The 1,800 ft Grid LSALTs will need to be increased by 400 ft to 2,200 ft AMSL. The Applicant will engage with Airservices Australia prior to the construction of the Project regarding the changes to Grid LSALTs. The proposed met masts are also within two airspace Grid LSALTs; however, these are not as high as the WTGs.

### **Air Route LSALTs**

Two air routes located within 7 nautical miles (NM) of the Project, W762 and H246, will be impacted by the amended Project. The Air Route LSALT for W762 will need to be raised 100 ft to 2,200 ft AMSL and the Air Route LSALT for H246 will need to be raised 200 ft to 2,200 ft AMSL. The Applicant will engage with Airservices Australia prior to the construction of the Project regarding the changes to Air Route LSALTs.

### **Uncertified Aerodromes**

The amended Project does not result in significant changes (to those identified in the EIS) to uncertified aerodromes within 3 NM of the Project; the amended Project is more than 3 NM from the nearest uncertified aerodromes, Jeraly Station and Keri Keri Aerodrome.

#### **6.6.2.3 NSW NATIONAL PARKS AND WILDLIFE SERVICE (NPWS)**

NPWS raised concerns regarding two aerial operation facilities, Jeraly Station and Keri Keri Aerodrome; however, both are more than 26 km (~14 NM) from the closest WTGs. This exceeds the 3 NM radius, within which impacts to uncertified aerodromes are required to be assessed.

NPWS also raised concerns about night lighting on WTGs and ancillary infrastructure. A lighting plan will be developed by the Applicant in consultation with CASA, NPWS and other relevant stakeholders. The plan will consider safety (paramount) as well as potential amenity impacts. If required, obstacle lighting on WTGs and other infrastructure will be a minimum 200 candela intensity. The Applicant is also committed to developing operational procedures in consultation with NPWS to minimize the any impacts to NPWS estates from obstacle lighting, while to ensure safety for air services.

#### **6.6.2.4 POTENTIAL WAKE TURBULENCE IMPACTS**

There remains a limited possibility of wake turbulence affecting operations of aircraft arriving and departing at the Keri Keri Aerodrome, consistent with the EIS. However, WTGs that were closest to Jeraly Station aircraft landing area (ALA) have been removed in the amended Project and, therefore, wake turbulence is not expected at Jeraly Station ALA.

#### **6.6.2.5 AIRSPACE PROTECTION, AVIATION FACILITIES AND RADAR INSTALLATIONS**

The amended Project will not impact on airspace protection (controlled or designated airspace) or aviation facilities at YBRN.

Mt Macedon Secondary Surveillance Radar (SSR) is the closest radar facility to the Project, about 296 km to the south. The amended Project is outside the range of the Mt Macedon radar and, therefore, the Project will not impact this facility.

### 6.6.2.6 RISK ASSESSMENT

The risk assessment for the amended Project remains consistent with the outcomes of EIS.

### 6.6.2.7 LIGHTING OF WTGS

A lighting plan will be prepared prior to construction of the Project, in accordance with NASF Guideline D and in consultation with CASA, NPWS, Project landowners and neighbours. As necessary, obstacle lighting installed will be a minimum 200 candela intensity.

### 6.6.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation measures proposed in the EIS are sufficient to address impacts related to the proposed amendments, with the addition of:

- A lighting plan will be prepared prior to construction of the Project, in accordance with NASF Guideline D and in consultation with CASA, NPWS, Project landowners and neighbours. As necessary, obstacle lighting installed will be a minimum 200 candela intensity.

## 6.7 TELECOMMUNICATIONS AND ELECTROMAGNETIC INTERFERENCE

### 6.7.1 BACKGROUND

The Electromagnetic Interference (EMI) Assessment (Middleton Group, 2023) prepared for the EIS has been updated to assess the amended Project and to address a submission received from NPWS, dated 15 July 2024 (Amended Telecommunications and EMI Assessment, Appendix K).

Amendments relevant to impacts to EMI and telecommunications include:

- Reduction of WTGs from 155 to 114;
- Micro-siting / relocation of WTGs, ancillary infrastructure and temporary facilities; and
- Updated radiocommunications environment.

Nearby radiocommunications licenses that may be impacted by the Project were identified from the Australian Communications and Media Authority (ACMA) Register (accessed 4 December 2025). The Amended EMI has considered changes in nearby radiocommunication licences or services as well as the amended Project.

### 6.7.2 IMPACT ASSESSMENT

The Amended EMI identified four point-to-point links and associated radiocommunications towers operated by the NSW Telco Authority within a 2 km buffer of Project WTGS, while three links pass through the Project Area. This is consistent with the findings of the EIS.

WTGs in proximity to identified point-to-point links and/or associated radiocommunication towers have been relocated. This was undertaken in consultation with the asset operators and with consideration of NSW RFS advice that potential impact from EMI must be reduced.

The Amended EMI concludes that the Project is unlikely to have a material impact on existing telecommunication services.

The Amended EMI demonstrates that there is no change in impacts for other services, including:

- Wireless and satellite internet services;
- Broadcast and digital radio;
- Broadcast, digital and satellite television;
- Trigonometry stations; and
- GPS.

In response to NSW NPWS advice, the Applicant has committed to maintaining the operational performance of any NPWS radio links. As necessary, the Applicant will implement measures to avoid and/or manage operational issues that may occur to point-to-point links or mobile radio performance during operation of the Project.

### 6.7.3 UPDATED MITIGATION AND MANAGEMENT

An additional mitigation and management measure has been recommended, to establish a reporting pathway between the Applicant and NPWS to prevent and manage any operational issues which arise due to Project operations on point-to-point links or mobile radio performance.

All other mitigation and management measures proposed in the EIS remain consistent and are considered sufficient to address impacts that may arise from the amended Project.

## 6.8 WATER

### 6.8.1 BACKGROUND

The flooding and hydrology assessment prepared to inform the EIS (BMT, 2024) has been updated to assess potential impacts relating to hydrology and flooding associated with the amended Project (Addendum Flood Assessment; Appendix H). The Addendum Flood Assessment also includes updates, as necessary, in response to matters raised in submissions.

Amendments relevant to potential impacts on flooding and hydrology include:

- Reduction of the temporary Disturbance Footprint from 1,137 ha to up to 764 ha;
- Revised Project Area to remove two site access points;
- Reduction in number of WTGs from 155 to 114;
- Reduction of ancillary infrastructure, e.g., number of O&M facilities, met masts etc.; and
- Relocation of WTGs, ancillary infrastructure and temporary facilities.

The Addendum Flood Assessment was prepared in accordance with:

- 'Australian Disaster Resilience Handbook 7 Managing the Floodplain: A Guide to Best Practice in Flood Risk Management in Australia' (Australian Institute for Disaster Resilience, 2017);
- 'Guide to Road Design Part 5: Drainage-General and Hydrology Considerations' (Austroads, 2023);
- 'Guidebook to the Estimation of Probable Maximum Precipitation: Generalised Southeast Australia Method' (BoM, 2006);
- 'Flood Risk Management Guideline FB02: Flood Function' (DPHI, 2023); and
- 'Review of ARR Design Inputs for NSW' (NSW OEH, 2019).

The Addendum Flood Assessment includes updated hydraulic modelling (TUFLOW) of 5%, 1%, 0.5% and 0.2% annual exceedance probability (AEP) and probable maximum flood (PMF) events. Updates were also made to the riverine hydraulic models of catchments located within the Project Area to assess breakout flooding. This included:

- Assessment of the potential impact of the amended Project on flood behaviour (design events);
- Assessment of the impact climate change may have on flood behaviour during operations; and
- Recommended mitigation measures to reduce the risk of flooding on the amended Project and reduce the impact of the amended Project on existing flood behaviour.

### 6.8.2 IMPACT ASSESSMENT

The Addendum Flood Assessment determined that flooding impacts that may result from the amended Project are generally consistent with those detailed for the EIS Project layout. There is no measurable change in flood levels or flood behaviour between the amended Project and the EIS Project. The amended Project would also not have a measurable impact on flood behaviour under future climate change scenarios.

The amended Project will not have an impact on peak flood levels during a 1% AEP flood event; however, areas of the amended Project layout may be affected by flood velocities commensurate with Hazard Category H1 to H3 (Figure 6-5). However, this does not correspond to significant flood hazards. Hazards are localised in areas surrounding the Abercrombie Creek flow path.

Breakout flows from the Murrumbidgee River during extreme flood events does not affect water levels or increase flood risk within the Project Area.

Most of the Project Area remains flood free in the 5% AEP event; however, access to and within the Project Area may be limited in these events. Areas within the site may become inundated in a PMF event, with depths of up to 2 m estimated around some WTG locations and commensurate Hazard Category H4 (refer to Figure 6-6). Risks associated with access or isolation during flood events from the 5% AEP or greater will be mitigated through appropriate emergency management.

### 6.8.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation and management measures recommended to prevent or minimise flood impacts and risks to the project during operational and construction stages will be adequate to minimise risk to and from the amended Project. No additional mitigation measures are recommended. The Applicant will continue to engage with NSW State Emergency Services (SES) regarding flood emergency management.

FIGURE 6-5 DEVELOPED CASE - PMF WITH REGIONAL INFLOWS PEAK FLOOD DEPTH AND LEVEL

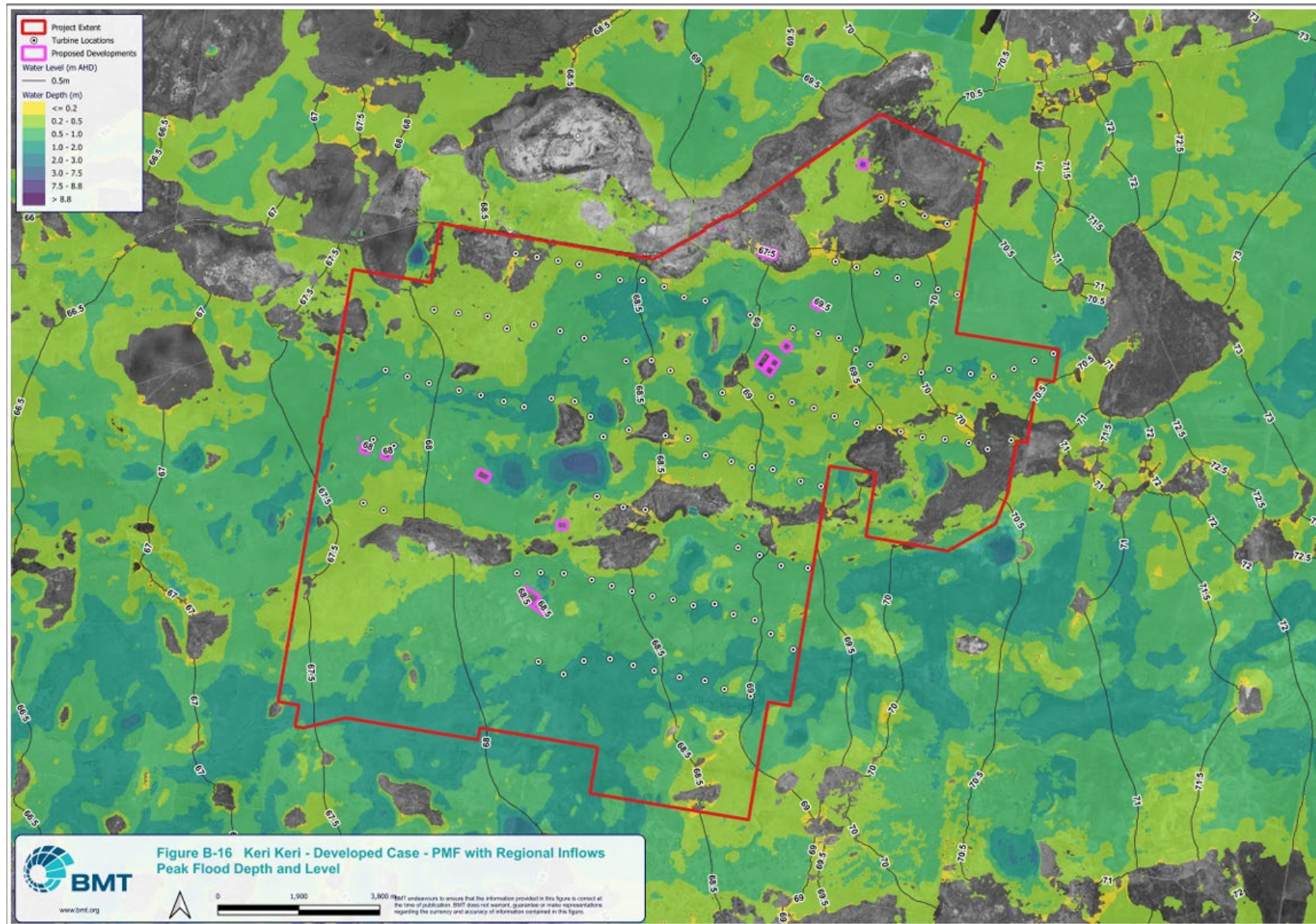
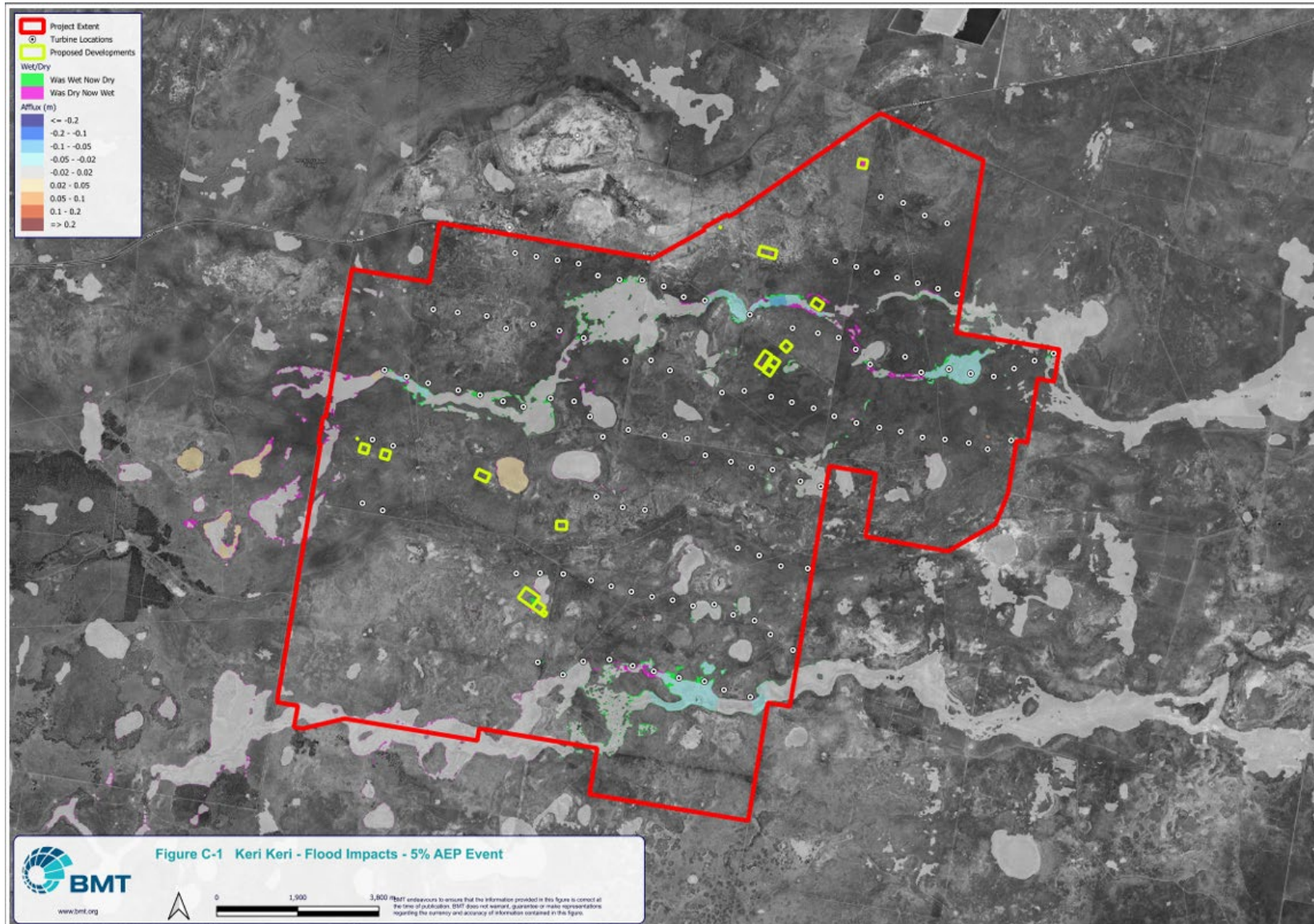


FIGURE 6-6 FLOOD IMPACTS - 5% AEP EVENT



## 6.9 LAND AND AGRICULTURE

### 6.9.1 BACKGROUND

The Agricultural Impact Assessment (AGIA) prepared for the EIS (Tremain Ivey Advisory, 2024) has been updated to assess potential impacts to land, soils and agriculture associated with the amended Project (Amended AGIA; Appendix L). The Amended AGIA has also addressed, as necessary, relevant submissions raised on the Project EIS.

Project amendments relevant to potential impacts on land, soil and agricultural include:

- Reduction in the number of WTGs from 155 to 114;
- Reduction in the temporary Disturbance Footprint from 1,137 ha to 764 ha;
- Reduction in the permanent Disturbance Footprint from 574 ha to 491 ha; and
- Reduction in construction period from 24 months to 18 months.

The Amended AGIA was prepared in accordance with:

- 'Cumulative Impact Assessment Guidelines for State Significant Projects' (NSW DPIE, 2021);
- 'Riverina Murray Regional Plan 2041' (NSW DPE, 2023);
- 'Land and Soil Capability Assessment Scheme' (NSW OEH, 2012);
- 'Agricultural Land Use Mapping Resources in NSW' (NSW DPI, 2017);
- 'Infrastructure Proposals on Rural Land' (NSW DPI, 2013); and
- 'Interim Protocol for Site Verification and Mapping of Biophysical Strategic Agricultural Land' (NSW OEH, 2013).

### 6.9.2 IMPACT ASSESSMENT

#### 6.9.2.1 CONSTRUCTION AND OPERATIONAL IMPACTS

The reduction in the size of the amended Project (compared to the EIS Project) and shortening of the construction timeframe have reduced the potential loss of agricultural land and, commensurately, the potential loss of grazing income during construction of the Project. Notably, the loss of grazing income during construction is influenced by the decision of the landowner for Property 1 to completely destock this area during construction. Regardless, the amended Project has reduced the potential loss of agricultural income during construction from about \$950,000 (over 24 months) to about \$532,000 (over 18 months).

The loss of agricultural income during operations is negligible and has been reduced compared to the EIS Project from about \$9,00 per annum to about \$5,000 per annum. This loss is significantly offset by the income the landowners will receive through lease payments from the Applicant.

On a regional scale, the amended Project layout has significantly reduced potential impacts to land, soil and agricultural productivity.

#### 6.9.2.2 CUMULATIVE IMPACTS

Cumulative impacts on agriculture in the region that may arise from the Project being constructed and operated concurrently with other major Projects are expected to be minor.

All projects in the region have relatively minor impact on agricultural productivity, as all will allow agricultural activities to continue across most of the respective project areas. The collective area of agricultural land removed from production in relation to the total project area of these projects is small relative to the total area in the region that is available for agricultural production. Consequently, regional-scale impacts on agricultural production are expected to be minor or negligible. Impacts on employment within the agricultural sector due to the Project and other relevant developments are expected; however, it is expected that supply and demand will cover the shortfalls.

### 6.9.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation measures proposed in the EIS are deemed adequate to address potential impacts related to the amended Project.

## 6.10 PRELIMINARY HAZARDS ANALYSIS

### 6.10.1 BACKGROUND

The Preliminary Hazard Analysis (PHA) prepared for the EIS (Arriscar Pty Ltd, 2024) has been updated to assess the risk of a blade throwing event at the Willowvale rest area, and the separation distance between BESS containers (Amended PHA; Appendix M). The Amended PHA has also addressed, as necessary, relevant submissions raised in the Project EIS.

Project amendments relevant to potential impacts on preliminary hazards include:

- Reduction in the number of WTGs from 155 to 114; and
- Micro-siting (moved <100 m) of 57 WTGs.

The Amended PHA was prepared in accordance with the:

- 'State Environmental Planning Policy (Resilience and Hazards)' (NSW Government, 2021);
- 'Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis' and Multi-level Risk Assessment' (HIPAP 6) (DPIE, 2011a);
- 'Hazard Industry Planning Advisory Paper No 4 – Risk Criteria for land Use Safety Planning' (HIPAP 4) (DPIE, 2011b);
- 'Hazardous and Offensive Development Application Guidelines: Applying SEPP 33' (Applying SEPP 33) (DPIE, 2011c); and
- 'AS/NZS 5139:2019 Electrical Installations – Safety of Battery Systems for use with Power Conversion Equipment' (Standards Australia, 2019).

### 6.10.2 IMPACT ASSESSMENT

#### 6.10.2.1 BLADE THROW RISK ANALYSIS

The previous risk analysis in the PHA (Arriscar Pty Ltd, 2024) found that WTGs 26, 177 and 186 contribute to the risk at the Willowvale rest area.

The Amended PHA reassessed the Project against HIPAP4 for the revised layout. To ensure the 10 per million per year (pmpy) individual risk criterion for active open space was met, WTG 186 was removed. Further analysis showed the Willowvale rest area remained within the 10 pmpy contour, with WTG 177 the main blade throw risk contributor; based on this, it was recommended that WTG 177 be relocated 50 m to the south.

#### 6.10.2.2 BESS CONTAINER SEPARATION DISTANCES

The amended Project will not change the hazards and risks associated with the BESS as assessed in the EIS. A minimum 3 m separation distance between adjacent BESS containers is still recommended. The BESS layout will be subject to further detailed design, which will consider the recommendations of the PHA, specifically the required spacing between BESS units.

DPHI requested clarification on whether the 200 MW/800 MWh BESS could fit within the proposed BESS area footprint, with consideration of the minimum separation distance required between BESS units. The Amended PHA includes an indicative layout for a 200 MW/800 MWh BESS with 3 m separation distance between BESS units within the 400 m x 300 m BESS compound. This demonstrates that there is adequate area within the BESS compound for the BESS units and inverters associated with the 200 MW/800 MWh BESS.

The BESS layout will be subject to further detailed design, which will consider the recommendations of the updated PHA, specifically the required spacing between BESS units.

#### 6.10.3 UPDATED MITIGATION AND MANAGEMENT

The amended Project layout does not satisfy the HIPAP 4 risk criteria for active open space (10 pmpy). Based on a sensitivity analysis, it is recommended that WTG 177 be relocated a minimum of 50 m to the south of the current location to satisfy the risk criteria, which is expected to be able to be accommodated within the micro-siting corridor.

The minimum 3 m separation distance between adjacent BESS containers proposed in the EIS is still sufficient to address impacts related to the BESS.

## 6.11 ECONOMIC

### 6.11.1 BACKGROUND

The Economic Assessment (EA) prepared for the EIS (Gillespie Economics , 2024) has been updated to assess potential economic impacts associated with the amended Project (Updated EA; Appendix N). The Updated EA includes updates, as necessary, in response to matters raised in submissions received for the EIS.

Amendments relevant to potential economic impacts include:

- Reduction in the number of WTGs from 155 to 114;
- Reduction in the temporary Disturbance Footprint from 1,137 ha to 764 ha; and
- Reduction in the permanent Disturbance Footprint from 574 ha to 491 ha.

### 6.11.2 IMPACT ASSESSMENT

Input-output (IO) analysis was used to identify the economic impact of the amended Project in terms of four main indicators:

- Gross regional output – the gross value of business turnover in a region;
- Value-added – the difference between the gross value of business turnover and the costs of the inputs of raw materials, components and services bought in to produce the gross regional output. These costs exclude wage costs;
- Income – the wages paid to employees including imputed wages for self-employed and business owners; and
- Employment – the number of people employed (including self-employed, full-time, and part-time).

The Study Area assessed in the Updated EA is consistent with that assessed in the EIS - the combined LGAs of Murray River, Balranald and Hay. These are included based on their potential to:

- Provide labour and non-labour inputs to the Project;
- Derive economic benefits from the construction and operation of the Project;
- Experience impacts from reduction in agricultural activity; and
- Experience impacts from increased demand for labour and other inputs to production.

#### 6.11.2.1 CONSTRUCTION IMPACTS

Over the 18-month construction phase, average monthly employment is estimated to peak at 650 FTE employees, with average annual employment for the peak 12-months of construction (year two) being 400 FTE employees. The assessment has conservatively assumed that all machinery manufacturing will occur outside the state of NSW.

Construction expenditure is associated with the manufacturing of equipment and expenditure across the following construction sectors (based on the IO industry classification):

- Heavy and Civil Engineering Construction Sector – includes businesses involved in engineering construction and project management services for a diverse range of activities including on-site assembly of heavy electrical machinery from prefabricated components, transmission lines, road construction etc.;

- Construction Services Sector – includes businesses involved in earthmoving work such as levelling of construction sites, excavation of foundations, trench digging, concreting services, electrical services, hire of earthmoving plant with operator etc.; and
- Non-Residential Building Construction Sector – includes businesses engaged in the construction of industrial buildings.

Based on the IO analysis, \$141 M of expenditure would be required across these sectors to generate this level of onsite workforce for a year, consistent with the EIS Project. Table 6-6 provides an overview of the average annual construction impacts for the peak 12-months of construction.

**TABLE 6-6 ANNUAL ECONOMIC IMPACTS ASSOCIATED WITH CONSTRUCTION**

Impact	EIS Project		Amended Project		Variation	
	Region	NSW	Region	NSW	Region	NSW
Direct and indirect output	\$217 M	\$340 M	\$217 M	\$340 M	Nil	Nil
Direct and indirect value-added	\$74 M	\$135 M	\$74 M	\$135 M	Nil	Nil
Direct and indirect household income	\$22 M	\$93 M	\$22 M	\$93 M	Nil	Nil
Direct and indirect jobs	524	910	524	910	Nil	Nil

#### 6.11.2.2 OPERATIONAL IMPACTS

A similar IO assessment was undertaken for the operations phase of the amended Project, taking into consideration the lower generating capacity. An overview of the average annual operational impacts are shown in Table 6-7.

**TABLE 6-7 ANNUAL ECONOMIC IMPACTS ASSOCIATED WITH OPERATION**

Impact	EIS Project		Amended Project		Variation	
	Region	NSW	Region	NSW	Region	NSW
Direct and indirect output	\$244 M	\$340 M	\$180 M	\$209 M	-\$64 M	-\$131 M
Direct and indirect value-added	\$210 M	\$135 M	\$154 M	\$168 M	-\$56 M	+\$33 M
Direct and indirect household income	\$1 M	\$93 M	\$1 M	\$10 M	Nil	-\$83 M
Direct and indirect jobs	34	910	29	104	-5	-806

#### 6.11.2.3 CUMULATIVE IMPACTS

No further cumulative impacts have been identified.

### 6.11.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation measures proposed in the EIS are deemed adequate to address potential impacts related to the amended Project.

## 6.12 PRELIMINARY SITE INVESTIGATION

### 6.12.1 BACKGROUND

A submission received from the DPHI requested the undertaking of a Preliminary Site Investigation (PSI) (Appendix O) to provide information on past and present potentially contaminating activities and land uses. The PSI assessed the likelihood of contamination (including soils, groundwater, ground gas, surface water and sediments), potential contamination types and the need for further investigation / management.

The PSI included:

- A desktop assessment of publicly available information for the Project Area including relevant government databases and published soil, geology and topographic maps;
- Development of a Preliminary Conceptual Site Model (CSM) and completion of a qualitative risk evaluation; and
- Development of proposed risk mitigation and management measures.

The PSI was carried out in accordance with guidance set out in the:

- National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended 2013 ('the ASC NEPM');
- Consultants Reporting on Contaminated Land, Contaminated Land Guidelines (NSW Environment Protection Authority, 2020); and
- Other relevant guidance prepared or endorsed by the NSW Environment Protection Authority (EPA).

### 6.12.2 IMPACT ASSESSMENT

#### 6.12.2.1 DESKTOP REVIEW

The desktop review identified the following Areas of Environmental Concern (AEC):

- AEC – 1 (within the Project Area) – historical mining and exploration;
- AEC – 2 (both within and outside of the Project Area) – Agricultural land potentially impacted by historical herbicide and pesticide applications; and
- AEC – 3 (both within and outside of the Project Area) – Agricultural land impacted by primary production activity.

Table 6-8 provides a summary of the location and characteristics of each AEC.

TABLE 6-8 AREAS OF ENVIRONMENTAL CONCERN (AEC)

AEC	Detail	Discussion/Comment
AEC - 1 – Historical mining and exploration	<p><b>Historical Mining and Exploration Activity</b> Historical mining and exploration titles have been identified for the Project Area and surrounding areas.</p>	<p>Historical mining activities were confirmed to have occurred within the Project Area and surrounding the Project Area for resources minerals and petroleum and could have resulted in contamination of soil, surface water and/or groundwater. Contaminants of Potential Concern (COPCs) include:</p> <ul style="list-style-type: none"> <li>• Petroleum hydrocarbons;</li> <li>• Polycyclic aromatic hydrocarbons (PAHs);</li> <li>• Solvents;</li> <li>• Heavy metals, particularly copper, lead, molybdenum, zinc and silver; and</li> <li>• Asbestos.</li> </ul>
AEC – 2 – Agricultural land potentially impacted by historical herbicides applications	<p><b>Agricultural Land – Herbicide and Pesticide Applications</b> The Project Area and surrounding areas have been associated with agricultural activity since at least the 1950s. Current licenses for herbicide application were not identified for the Project Area, however it is likely that herbicides and pesticides have been utilised within the Project Area and in the surrounding areas during this time.</p>	<p>The use of herbicides and pesticides could have results in contamination of soil, surface water and/or groundwater within the Project Area.</p> <p>COPCs include:</p> <ul style="list-style-type: none"> <li>• Herbicides and pesticides; and</li> <li>• Heavy metals associated with herbicides, particularly arsenic, copper, lead, cadmium, chromium, nickel, cobalt, zinc and mercury.</li> </ul>
AEC – 3 – Agricultural Land potentially impacted by primary production activity	<p><b>Agricultural Land – Agricultural Primary Production Activity</b> The Project Area and surrounding areas have been associated with agricultural activity since at least the 1950s. It is possible that fuels and degreasers were stored and/or used in relation to farm machinery/vehicle maintenance /demolition and could have resulted in unlicensed disposal of waste materials within the Project Area and in surrounding areas (i.e. buried waste), including animal carcasses.</p>	<p>No records regarding fuel/chemical use (except for the herbicides listed in AEC-2) or historical unlicensed waste disposal were identified within the Project Area or surrounding areas; however, it is possible these activities could have occurred and could have resulted in contamination of soil, surface water and/or groundwater within the Project Area.</p> <p>COPCs include:</p> <ul style="list-style-type: none"> <li>• Petroleum hydrocarbons;</li> <li>• Solvents;</li> <li>• PAHs;</li> <li>• Polychlorinated biphenyls (PCBs);</li> <li>• Phenols;</li> <li>• Heavy metals; and</li> <li>• Asbestos.</li> </ul>

### 6.12.2.2 PRELIMINARY CONCEPTUAL SITE MODEL

Based on the preliminary CSM, the relative level of risk of contamination associated with current and historical land use practices has been characterised (Table 6-9). This considers risk prior to implementation of any mitigation and measurement measures.

TABLE 6-9 RELATIVE LEVEL OF RISK OF CONTAMINATION

AEC No.	Likelihood	Consequence (Extent, Severity, Duration)	Risk Rating
AEC - 1 – Historical mining and exploration	Possible	Minor (1,4,2)	Low
AEC - 2 – Agricultural land potentially impacted by historical herbicides applications	Possible	Minor (1,4,2)	Low
AEC - 3 – Agricultural Land potentially impacted by primary production activity	Possible	Minor (1,4,2)	Low

### 6.12.3 UPDATED MITIGATION AND MANAGEMENT

Based on the risk evaluation presented in the PSI there is a low risk to human health and/or sensitive ecological receptors associated with current and historical land use practices. These risks can be managed through the implementation of mitigation measures outlined in Table 6-10.

TABLE 6-10 MITIGATION MEASURES – CONTAMINATION

Objective	Mitigation Measure	
Managing unexpected contamination during construction	<p>An Unexpected Finds Procedure should be developed as part of the Construction Environmental Management Plan (CEMP) and implemented during construction of the project. The Unexpected Finds Procedure should include requirements for cessation of work within the affected area(s) until after the following occurred:</p> <ul style="list-style-type: none"> <li>• Inspection of the suspected contamination by a qualified contaminated land specialist;</li> <li>• Collection of samples for analysis based on observations (soil, groundwater, surface water, etc.), followed by laboratory analysis;</li> <li>• Assessment of laboratory analytical results against applicable land use or waste classification criteria in accordance with applicable statutory guidelines; and</li> <li>• Management of the contamination in accordance with applicable statutory guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation (intrusive Maintenance worker) – if required based on observations during construction</li> </ul>

Based on the low-risk rating for AECs, further investigation is not required prior to commencement of construction of the Project.

## 6.13 CUMULATIVE IMPACTS

### 6.13.1 BACKGROUND

Cumulative impacts for the Project were assessed in the EIS in accordance with the 'Cumulative Impact Assessment Guidelines for State Significant Projects' (CIA Guidelines) (DPIE, 2022).

This Amendment Report provides an updated cumulative impact assessment that considers, as necessary, the amended Project and any changes to impacts associated with other relevant projects, and/or any other relevant projects that have arisen since exhibition of the EIS. The 'status' of projects considered in the cumulative impact assessment in the EIS has also been updated, where necessary. Similarly, relevant future projects that have been added, or withdrawn from the planning system have been considered.

### 6.13.2 IMPACT ASSESSMENT

Construction of the amended Project is anticipated to commence in Q4 2027, although yet to be confirmed. Although the start date of construction is tentative, overlap of the construction period with other projects in the region is likely to occur. Other relevant projects of particular concern are the Wilan Wind Farm, directly north of the Project, the Baldon Wind Farm, directly east of the Project and the Abercrombie Wind, directly northeast and west of the Project.

Several projects may have cumulative impacts relating to traffic and transport, and social factors, e.g., accommodation and worker influx, local employment and procurement.

Since exhibition of the Project EIS, other relevant future projects that require consideration for cumulative impacts include:

- Wilan Wind Farm (Kilara);
- Boooroorban (Saltbush) Wind Farm (Octopus Investments);
- Abercrombie Wind Farm (Vestas Development Australia);
- Koorakee Energy Park (Squadron Energy).
- Euston Wind Farm (DP Energy);
- Mallee Wind Farm (Spark Renewables);
- Gol Gol Wind Farm (Squadron Energy);
- Dinawan Solar Farm (Spark Renewables);
- Mallee Solar Farm (Spark Renewables);
- Balranald Mineral Sands Project (Iluka Resources Limited); and
- Gol Gol Battery Energy Storage System (Squadron Energy).

All projects considered are shown in Figure 6-8 and detailed in Table 6-11.

### 6.13.3 UPDATED MITIGATION AND MANAGEMENT

Mitigation measures proposed in the EIS are considered adequate to address cumulative impacts related to the amended Project.

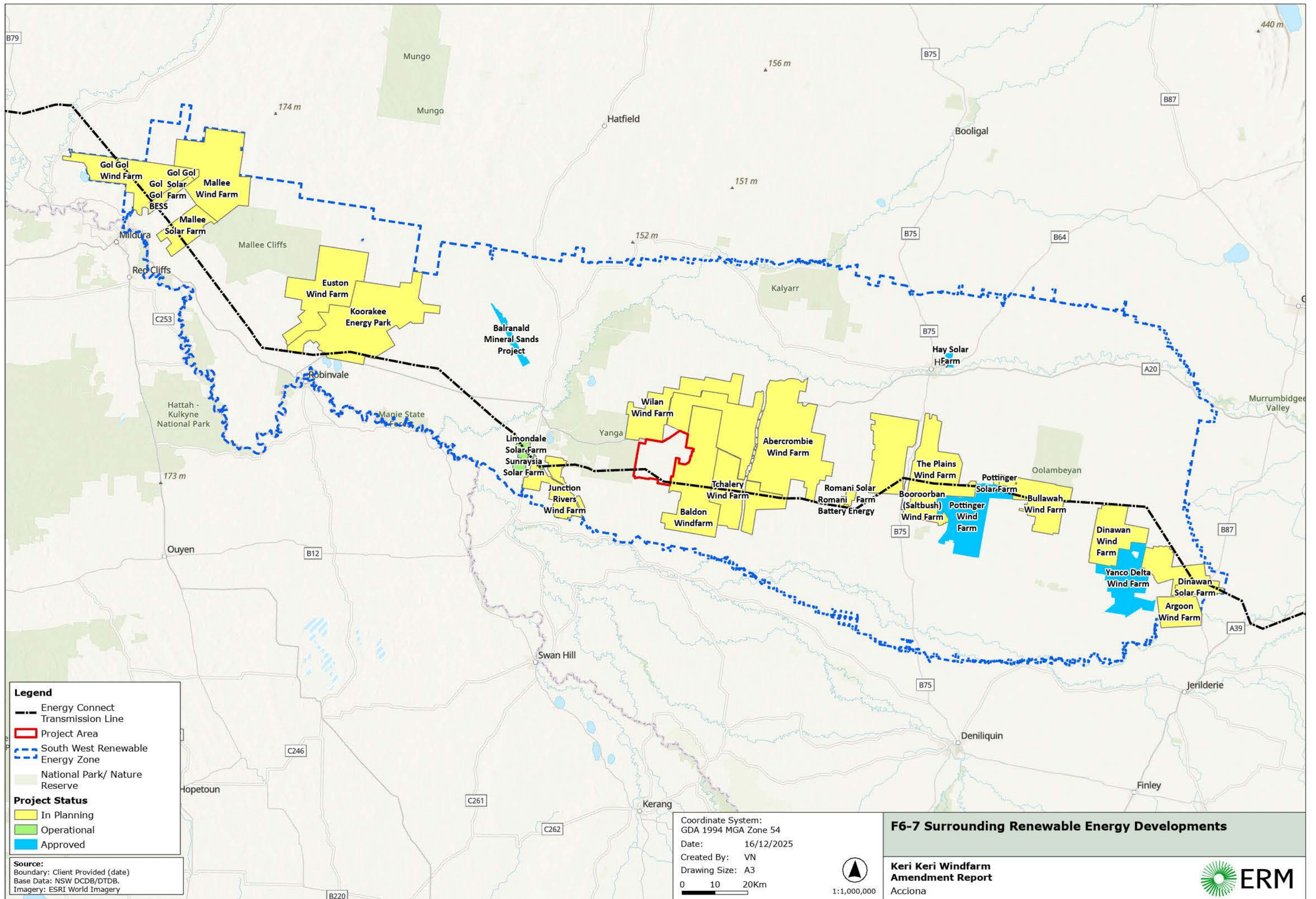


TABLE 6-11 RELEVANT FUTURE PROJECTS TO CONSIDER FOR CUMULATIVE IMPACTS

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
<b>Wind Energy Developments</b>			
Baldon Wind Farm (Assessment)	<ul style="list-style-type: none"> <li>Nominal generating capacity 1,400 MW.</li> <li>Up to 175 WTGs with a maximum height of 300 m to blade tip.</li> <li>BESS (200 MW/400MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 400 FTE.</li> <li>Operational workforce 35 FTE.</li> <li>Temporary workers' accommodation will be established within the project area.</li> </ul>	13 km south-east	<ul style="list-style-type: none"> <li>Construction expected to commence Q1 2026.</li> <li>Construction period of 3.5 years.</li> <li>Commissioning expected Q2 2029.</li> </ul>
Wilan Wind Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>Nominal generating capacity of up to 800 MW.</li> <li>Up to 107 WTGs with maximum height of 300 m to blade tip.</li> <li>BESS (200 MW/800 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 400 FTE.</li> <li>Operational workforce 10-15 FTE.</li> <li>Temporary workers accommodation will be established, with the location subject to Project design and community consultation.</li> </ul>	13 km north	<ul style="list-style-type: none"> <li>Construction expected to commence early 2025.</li> <li>Construction period is 24 to 30 months.</li> <li>Commissioning is expected in 2027 or 2028.</li> </ul>
Tchelery Wind Farm (Response to Submissions)	<ul style="list-style-type: none"> <li>Nominal generating capacity of 577 MW.</li> <li>Up to 74 WTGs with maximum height of 270 m to blade tip.</li> <li>BESS (350 MW/1,450 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 530 FTE.</li> <li>Operational workforce of up to 20 FTE.</li> <li>Temporary workers' accommodation will be established within the project area.</li> </ul>	25 km south-east	<ul style="list-style-type: none"> <li>Construction expected to commence early 2027.</li> <li>Construction period is approximately 3 years.</li> <li>Commissioning is expected to be early 2030.</li> </ul>

<sup>2</sup> Indicative direct-line distances from the approximate centre points of the Project sites

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
Junction Rivers Wind Farm (formerly Burrawong Wind Farm)  (Assessment)	<ul style="list-style-type: none"> <li>Nominal generating capacity 750 MW.</li> <li>Up to 107 WTGs with a maximum height of 300 m to blade tip.</li> <li>BESS (250 MW/500 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 250 FTE.</li> <li>Operational workforce 10-15 FTE.</li> <li>Existing facilities in Balranald and other options in Kyalite and surrounding region will be utilised for construction staff accommodation.</li> </ul>	33 km south-west	<ul style="list-style-type: none"> <li>Construction is expected to commence within six months of development approval.</li> <li>Construction period of 48 months.</li> </ul>
The Plains Wind Farm  (Assessment)	<ul style="list-style-type: none"> <li>Nominal generating capacity of up to 1,800 MW.</li> <li>Up to 226 WTGs with maximum height of 280 m to blade tip plus ancillary infrastructure.</li> <li>Peak construction workforce 700 FTE.</li> <li>Operational workforce 40 FTE onsite and 6 FTE offsite.</li> </ul>	56 km north-east	<ul style="list-style-type: none"> <li>Construction expected to commence in Q1 2027.</li> <li>Construction period of 40 months (peak 24 months).</li> <li>Commissioning expected 2028-2029.</li> </ul>
Booroorban (Saltbush) Wind Farm  (Prepare EIS)	<ul style="list-style-type: none"> <li>Generating capacity of up to 400 MW.</li> <li>Up to 70 turbines with a maximum height of 280m to blade tip.</li> <li>BESS (600 MW/ 1200 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce of approximately 280 FTE.</li> <li>Operational workforce of approximately 28 FTE.</li> </ul>	130 km south east	<ul style="list-style-type: none"> <li>Construction is expected to begin in 2028.</li> <li>Construction period of 30 months.</li> <li>Commissioning is expected mid-2030.</li> </ul>
Pottinger Wind Farm  (Approved)	<ul style="list-style-type: none"> <li>Nominal generating capacity of 750 MW.</li> <li>Up to 108 WTGs with maximum height of 280 m to blade tip.</li> <li>BESS (500 MW/2000 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 450 FTE.</li> <li>Operational workforce 40 FTE.</li> <li>Temporary workers accommodation located within the Project Area or located offsite.</li> </ul>	99 km east	<ul style="list-style-type: none"> <li>Construction of WTGs is expected to commence in Q4 2026.</li> <li>Construction period up to 55 months including design, procurement, construction and commissioning.</li> <li>Commissioning expected in Q3 2027.</li> </ul>

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
Bullawah Wind Farm (Assessment)	<ul style="list-style-type: none"> <li>Nominal generating capacity of 750 MW.</li> <li>141 WTGs with maximum height of 300 m to blade tip.</li> <li>BESS (storage of 359 MW/718 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 380 FTE.</li> <li>Operational workforce 40 FTE.</li> <li>Temporary workers accommodation may be located within the Project Area (as required).</li> </ul>	115 km east	<ul style="list-style-type: none"> <li>Construction is expected to commence in Q4 2025.</li> <li>Construction period is about 34-months.</li> <li>Commissioning expected 2027 (full scale operations).</li> </ul>
Yanco Delta Wind Farm (Approved)	<ul style="list-style-type: none"> <li>Nominal generating capacity of 1,500 MW.</li> <li>Up to 208 WTGs with maximum height of 270 m to blade tip.</li> <li>BESS (500 MW/500 MWh) and ancillary infrastructure</li> <li>Peak construction workforce 300 FTE.</li> <li>Operational workforce of 20-30 FTE.</li> <li>Workforce accommodation is expected to rely on available rental, motel and other accommodation in surrounding townships and regional centres.</li> </ul>	151 km east	<ul style="list-style-type: none"> <li>Construction expected to commence in 2027 and be completed by 2031</li> <li>Construction period is about 36 months.</li> <li>Commissioning expected to be late 2027.</li> </ul>
Dinawan Wind Farm (Assessment)	<ul style="list-style-type: none"> <li>Nominal generating capacity of 1,500 MW.</li> <li>Up to 200 WTGs with maximum height of 280 m to blade tip.</li> <li>BESS (300 MW/1200 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 800 FTE.</li> <li>Operational workforce up to 50 FTE.</li> <li>Workforce accommodation is expected to rely on available rental, motel and other accommodation in surrounding townships and regional centres.</li> </ul>	153 km south-east	<ul style="list-style-type: none"> <li>Construction expected to commence in 2025.</li> <li>Construction period of up to 36 months.</li> <li>Commissioning is expected in 2028.</li> </ul>

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
Argoon Wind Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>• Estimated generating capacity of up to 901 MW.</li> <li>• Up to 105 WTGs with maximum height of 249 m to blade tip.</li> <li>• BESS (460 MW/2300 MWh) and ancillary infrastructure.</li> <li>• Peak construction workforce 340 FTE.</li> <li>• Operational workforce between 6 and 12 FTE.</li> <li>• Temporary workforce accommodation will be included if required.</li> </ul>	158 km east	<ul style="list-style-type: none"> <li>• Construction is estimated to commence within one year of project approval.</li> <li>• Construction period is about 24-36 months.</li> </ul>
Abercrombie Wind Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>• Estimated generating capacity of up to 2.5 GW.</li> <li>• Up to 348 WTGs with maximum height of 300 m to blade tip.</li> <li>• BESS (500 MW/2000 MWh) and ancillary infrastructure.</li> <li>• Peak construction workforce 600 FTE.</li> <li>• Operational workforce between 30 and 40 FTE.</li> <li>• Temporary workforce accommodation will be included if required.</li> </ul>	40 km east	<ul style="list-style-type: none"> <li>• Construction is expected to commence within Q1 2028.</li> <li>• Construction period is approximately 5 years.</li> </ul>
Koorakee Energy Park (Prepare EIS)	<ul style="list-style-type: none"> <li>• Development of a 2 GW energy park with solar farm, wind farm and BESS</li> <li>• Up to 167 WTGs with a total height of 270 meters to blade tip.</li> <li>• BESS (1 GW/ 12 GWh) and ancillary infrastructure.</li> <li>• Construction workforce between 300 to 400 FTE.</li> <li>• Operation workforce between 10 to 15 FTE.</li> </ul>	116 km north-west	<ul style="list-style-type: none"> <li>• Construction is estimated to commence in late 2025.</li> <li>• Construction period is about 24-36 months.</li> <li>• Commissioning is expected in 2028-2029.</li> </ul>
Euston Wind Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>• Estimated generating capacity of up to 691 MW.</li> <li>• Up to 96 WTGs with maximum height of 275 m to blade tip.</li> <li>• BESS (500 MW/2000 MWh) and ancillary infrastructure.</li> <li>• Peak construction workforce 250 FTE.</li> <li>• Operational workforce of approximately 15 FTE.</li> </ul>	123 km west	<ul style="list-style-type: none"> <li>• Construction estimated to commence in Q2 2025</li> <li>• Construction period about 18-24 months</li> <li>• Commissioning in Q2 2027</li> </ul>

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
Mallee Wind Farm (Response to Submissions)	<ul style="list-style-type: none"> <li>Expected generating capacity of up to 402 MW.</li> <li>Up to 76 WTG with a maximum height of 280 m to blade tips.</li> <li>BESS (100 MW/ 200 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce 400 FTE.</li> <li>Operational workforce of approximately 30 FTE.</li> </ul>	90 km north-west	<ul style="list-style-type: none"> <li>Construction planned to commence in 2026 for approximately 3-years.</li> </ul>
Gol Gol Wind Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>Expected generating capacity of up to 840 MW.</li> <li>Up to 120 WTGs with a maximum height of 280 m to blade tips.</li> <li>Transmission and ancillary infrastructure.</li> <li>Peak construction workforce between 300 and 400 FTE.</li> <li>Operational workforce of approximately 10 to 15 FTE.</li> </ul>	140 km north-west	<ul style="list-style-type: none"> <li>Construction period approximately 24 to 36 months.</li> <li>Construction is estimated to commence late 2028.</li> <li>Commissioning expected in 2028.</li> </ul>
<b>Solar Energy Developments</b>			
Limondale Solar Farm (Operational)	<ul style="list-style-type: none"> <li>Generating capacity 250 MW with 868,00 solar panels.</li> <li>BESS and ancillary infrastructure.</li> <li>Peak construction workforce of 200 FTE and operational workforce of 4-7 FTE.</li> </ul>	40 km west	<ul style="list-style-type: none"> <li>Currently operational.</li> </ul>
Sunraysia Solar Farm (Operational)	<ul style="list-style-type: none"> <li>Generating capacity 200 MW. With 750,000 solar panels and ancillary infrastructure.</li> <li>Peak construction workforce of 250 FTE and operational workforce of at least 2 FTE.</li> </ul>	42 km west	<ul style="list-style-type: none"> <li>Currently operational.</li> </ul>
The Plains Solar Farm (Withdrawn)	<ul style="list-style-type: none"> <li>Nominal generating capacity of 400 MW with 900,000 solar panels.</li> <li>BESS with a capacity of up to 400 MW/1.6 GWh.</li> <li>Peak construction workforce of up to 278 FTE employees</li> <li></li> </ul>	72 km east	<ul style="list-style-type: none"> <li>Construction is expected to commence in 2026.</li> <li>Construction period is approximately 18 months.</li> <li>Commissioning is expected in 2028.</li> </ul>

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
Hay Solar Farm (Approved)	<ul style="list-style-type: none"> <li>Generating capacity 110 MW with 430,000 solar panels.</li> <li>150 FTE during peak construction and between 2 and 5 FTE during operation.</li> <li>Currently under construction.</li> </ul>	93 km north-west	<ul style="list-style-type: none"> <li>Construction period is expected to last 12-months.</li> </ul>
Pottinger Solar Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>Generating capacity 300 MW with 750,000 solar panels.</li> <li>BESS (500 MW/2000 MWh) and ancillary infrastructure.</li> <li>Peak construction workforce of 220 FTE and operational workforce of 4 FTE.</li> <li>Temporary workforce accommodation to be investigated.</li> </ul>	102 km east	<ul style="list-style-type: none"> <li>Construction expected to commence in 2026.</li> <li>Construction period is estimated to take 24-36 months including commissioning.</li> </ul>
Southdown Solar Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>Generating capacity 130 MW with 335,000 solar panels and other associated infrastructure.</li> <li>Workforce of up to 200 FTE during construction.</li> </ul>	130 km south-east	<ul style="list-style-type: none"> <li>Construction was expected to commence in 2022 but has not yet begun.</li> <li>Construction period is about 15 months.</li> </ul>
Currawarra Solar Farm (Approved)	<ul style="list-style-type: none"> <li>Generating capacity 195 MW with 654,000 solar panels with associated infrastructure.</li> <li>Workforce of approximately 200 FTE during construction and 4 FTE during operations.</li> </ul>	140 km south-east	<ul style="list-style-type: none"> <li>Construction period is expected to last for 18 months.</li> </ul>
Dinawan Solar Farm (Assessment)	<ul style="list-style-type: none"> <li>Generating capacity of 800 MW with 2 million solar PV panels with associated infrastructure.</li> <li>BESS (330MW/600 MWh) and ancillary infrastructure.</li> </ul>	240 km south-east	<ul style="list-style-type: none"> <li>Construction is expected to commence in 2025.</li> <li>Construction period is estimated to take 18-36 months, including commissioning.</li> <li>Commissioning expected in 2026.</li> </ul>
Mallee Solar Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>Development of an 600 MW solar farm, associated infrastructure and BESS with a capacity of 200 MW/400 MWh.</li> <li>Construction workforce of approximately 300 FTE.</li> <li>Operational workforce of approximately 10 FTE.</li> </ul>	90 km north-west	<ul style="list-style-type: none"> <li>Construction is expected to commence early in 2026.</li> <li>Construction period is estimated to take 24 to 36 months.</li> </ul>

Project	Description	Approximate Distance (km) <sup>2</sup>	Construction Period / Timeline
Gol Gol Solar Farm (Prepare EIS)	<ul style="list-style-type: none"> <li>Development of a 600 MW solar farm with approximately 2 million solar PV modules and ancillary infrastructure.</li> <li>Construction workforce of approximately 200 FTE.</li> <li>Operational workforce of approximately 4 FTE.</li> </ul>	140 km north-west	<ul style="list-style-type: none"> <li>Construction period is estimated to take approximately 24 to 36 months.</li> </ul>
<b>Other Developments</b>			
Project EnergyConnect (NSW – Eastern Section) (Approved)	<ul style="list-style-type: none"> <li>330kV transmission line.</li> <li>375 km of new transmission lines and associated infrastructure.</li> <li>Up to 500 construction jobs and 5 operational jobs.</li> </ul>	0 km (transects the Project Area)	<ul style="list-style-type: none"> <li>Construction and remediation work expected to be completed in September 2026.</li> </ul>
Balranald Mineral Sands Project (Approved)	<ul style="list-style-type: none"> <li>Approved proposals: <ul style="list-style-type: none"> <li>Mod-1: to undertake underground mining and minor realignment of a water pipeline; and</li> <li>Mod-4: development of a 21 MW solar farm, a 10 MW/10 MWh BESS and associated ancillary components, and an additional groundwater bore.</li> </ul> </li> <li>Combined construction workforce of approximately 275 FTE.</li> <li>Combined operational workforce of approximately 155 FTE.</li> </ul>	40 km west	<ul style="list-style-type: none"> <li>Construction and operational period for Mod-1 expected to commence late 2025 and last approximately seven – eight years.</li> <li>Construction for Mod-4 expected to commence late 2025 and take approximately nine months.</li> </ul>
Gol Gol Battery Energy Storage System (Prepare EIS)	<ul style="list-style-type: none"> <li>Development of a 1,500 MW/12 GW-hour BESS.</li> <li>Construction workforce of approximately 150 FTE.</li> <li>Operational workforce of approximately 10 – 15 FTE.</li> </ul>	140 km north-west	<ul style="list-style-type: none"> <li>Construction period expected to last 12 – 24 months.</li> <li>No expected start date for commencement of construction.</li> </ul>
Romani Battery Energy Storage System (formerly Romani Solar Farm) (Response to Submissions)	<ul style="list-style-type: none"> <li>Development of a 250 MW/800 MWh BESS and ancillary infrastructure.</li> <li>Peak construction workforce of 80 to 100 FTE.</li> <li>Temporary workforce accommodation to be investigated.</li> </ul>	70 km west	<ul style="list-style-type: none"> <li>Construction is expected to commence in mid-2026.</li> <li>Construction period of over 20 months, including commissioning.</li> </ul>

## 7. JUSTIFICATION

*This section includes a summary of the justification and evaluation of the amended Project. It incorporates any relevant issues raised in submissions and the Applicant's response to these issues.*

### 7.1 PROJECT EVALUATION

#### 7.1.1 CONSISTENCY WITH STRATEGIC CONTEXT

Australia is undergoing a technology change in electricity generation from a centralised system of largely coal-fired energy generation to a decentralised system of renewable energy generation and storage. This change is linked to climate change policy ambitions, specifically legislated emissions reduction and 'net zero' targets. Onshore wind and solar energy remain the lowest cost of source of new-build electricity generation in Australia (Graham, Hayward, & Foster, 2025). Renewable energy is the fastest growing energy source globally, led by wind and solar photovoltaic.

The Project remains consistent with the principles of ecologically sustainable development (ESD), as described in the EIS, and will provide significant environmental, social and economic benefits. These include:

- Contributing positively to the sector-wide update of energy generation technology;
- Generating enough renewable energy for about 426,000 average NSW homes, and displacing approximately 2.4 million t CO<sub>2</sub><sup>e</sup> per annum;
- Contributing to NSW and Australian Government emissions reduction targets;
- Strategically located in the South West REZ (Figure 1-1), and aligns with the strategic objectives of the REZ, and relevant NSW and Australian Government strategies, policies, and plans across regional and local contexts;
- Careful consideration of site selection based on:
  - Favourable wind resource;
  - Favourable topography;
  - Historical use for agricultural practices (Grazing) and significant areas of predominantly cleared land;
  - Proximity to existing and planned transmission and distribution networks;
  - Location in a region with limited number of private dwellings;
  - Accessibility;
- The Project Layout has been amended to avoid and minimise environmental and social impacts and maximise the use of existing disturbed areas;
- Providing ongoing economic benefits to the NSW and regional economy generating significant opportunities for local contractors and businesses to supply services during construction and operation, providing local employment, training and development opportunities for the regional workforce, specifically the Project is expected to generate:
  - Up to 650 Full Time Equivalent (FTE) jobs during construction; creating about:
    - \$217 million (M) in annual direct and indirect output;
    - \$74 M in annual direct and indirect value add;

- \$22 M in annual direct and indirect household income;
- 524 direct and indirect jobs;
- Up to 12 FTE jobs during operations, creating about;
  - \$180M in annual direct and indirect regional output.
  - \$154M in annual direct and indirect regional value-added.
  - \$1M in annual direct and indirect household income.
  - 29 direct and indirect jobs.
- Providing a diversified income for host landholders through lease payments, which can be used to make their businesses more resilient to the impacts of droughts, fires, floods and commodity price fluctuations;
- Providing benefits to Project neighbours and the broader region through the establishment of a CBF to provide economic support to local non-profit organisations, community programs/events, local businesses, training, and services/infrastructure; and
- Potential impacts from the Project have been minimised and any residual impacts can be appropriately managed and/or offset in accordance with relevant policies.

Not proceeding with the Project represents the status quo and avoids development impacts; however, it does not realise the Projects benefits, including the generation of renewable energy and additional energy security through the inclusion of a BESS.

### 7.1.2 CONSISTENCY WITH COMMUNITY VIEWS

Since exhibition of the EIS, the Applicant has continued to engage with landowners, Project neighbours, the community, local government, NSW and Australian government agencies, and business and stakeholder groups.

Submissions in support of the Project recognised the need of the Project to assist Australia in updating its energy generation technology to a decentralised system of renewable energy generation firmed by energy storage. This update is needed to reduce emissions of harmful greenhouse gases from the electricity sector and, in so doing, minimising the impacts of climate change.

While submissions in objection to the Project outweighed those in support, notably all these submissions were from the region (5-100 km from the site) and broader community (>100 km from the site). Notwithstanding, the views of those that objected to the Project have been reviewed and justifications provided or, where necessary, amendments made to the Project layout.

### 7.1.3 CONSISTENCY WITH AGENCY VIEWS

In redesigning the Project, the Applicant has sought to further avoid environmental constraints, particularly those relating to Aboriginal cultural heritage and biodiversity.

For example, advice provided by Heritage NSW raised concerns about the number of identified Aboriginal cultural heritage sites within the Disturbance Footprint and micro-siting corridor. As identified below (Table 7-1), the amended Project Disturbance Footprint has avoided all but one identified site and the number of sites within the micro-siting corridor have been significantly reduced.

Similarly, in response to the submission by the BCS, the Applicant has undertaken significant additional biodiversity surveys for threatened species, to collect more bird utilisation and bat acoustic monitoring data and collect more vegetation data. This has enabled the Applicant to:

- Create a more robust vegetation map of the Project Area;
- Eliminate the need to assume presence for threatened species;
- Significantly reduce the area of potential impact for threatened species; and
- Build a more robust collision risk model to inform the Bird and Bat Adaptive Management Plan (BBAMP).

All other letters of advice provided by agencies have been responded to as outlined in Section 4 of the Submissions Report (ERM, 2026) and, as necessary, technical assessments have been updated to accommodate submissions and assess the amended design.

The DPHI raised concerns regarding grid connection. While the Applicant was unsuccessful in obtaining rights to the SW REZ access scheme, they are pursuing several other options. These include:

- Data Centre Co-location (behind-the-meter partnership);
- Collaboration with TransGrid/Lumea and other developers to upgrade the existing 220 kV network infrastructure;
- Future SW REZ augmentations; and
- Joint transmission development partnerships with other developers.

Obtaining planning approval for the Project will enable further progression of the transmission connection pathway. Other avenues through which the Project may connect to the network include:

- The failure of other developments that were awarded access rights and those rights being made open to other developers through another tender process; and
- Leveraging the potential for a future SW REZ transmission headroom assessment and an increase in the transfer capacity available, i.e., future SW REZ tenders.

#### 7.1.4 ACTIONS TAKEN TO FURTHER AVOID OR MINIMISE IMPACTS

Since exhibition of the EIS, the Project has been amended to:

- Further avoid and minimise adverse environmental and social impacts;
- Consider updated technical assessments including those for Aboriginal cultural heritage, biodiversity, noise, visual, hazards and risk, transport to protect sensitive areas and receivers;
- Address matters raised in submissions during the EIS exhibition and the outcomes of ongoing engagement;
- Maximise the yield of wind power generation by optimising the positioning of WTGs, with consideration of constraints;
- Maintain minimum generating capacity to achieve commercial viability for the Project; and
- Optimise accessibility of the Project elements through identifying constructability constraints and strategically positioning Project elements.

The Applicant has undertaken additional civil design work that allowed reduction of Project elements in key areas while maintaining the Project's feasibility. These changes to the layout required updates to technical assessments and mitigation measures. This demonstrates the Applicant's commitment to develop a Project that responds to values and concerns raised by the community, neighbouring and host landholders, Aboriginal parties, local council and government agencies.

The amendments have also considered the cumulative impacts of the Project in combination with other past, present and reasonably foreseeable future SSDs. Potential cumulative impacts relating to aspects including biodiversity, heritage, flooding, traffic, preliminary hazards, bushfire, economic, and social are presented in Amendment Report (ERM, 2025).

The amended Project includes:

- Revision of the Project Area to remove two site access points;
- Removal of 41 WTGs;
- Micro-siting (moved <100 m) of 57 WTGs;
- Relocation (moved >100m) of 6 WTGs;
- Optimisation of electrical reticulation, including:
  - Eliminating 64.5 km of 33 kV overhead transmission;
  - Increase in the length of 33 kV underground transmission by 20.3 km;
  - Decrease in the length of 330 kV overhead transmission by 3.79 km;
  - Additional 220 kV or 330 kV transmission line (Switching Station to proposed connection point) by 0.7 km
- Reduction in the number of O&M facilities, from three to one;
- Reduction in the number of security huts, from four to two;
- Optimisation of internal access tracks, which has reduced the total length by 31.8 km (from 148.3 km to 116.5 km);
- Relocation (<100 m, within micro-siting corridor) of ancillary infrastructure including:
  - 33/330 kV substations;
  - 200 MW/800 MWh BESS;
- Reduction in the number of biosecurity wash bays from 4 to 2 (aligned with the reduction in site access points);
- Removal of the option to use Port of Newcastle as a port of import, and associated transport route from the Port of Newcastle;
- Relocation (<100 m, within micro-siting corridor) of temporary infrastructure, including:
  - Worker accommodation camp;
  - Concrete batching plants;
  - Laydown areas;
  - Carparks;
  - Construction compounds;
- Reduction in the number of permanent meteorological masts, from four to three; and
- Reduction in the number of temporary meteorological masts, from four to three.

Table 7-1 provides a summary of the updated evaluation of the amendments proposed for the Project as assessed in detail in the Keri Keri Wind Farm Amendment Report.

**TABLE 7-1 SUMMARY OF UPDATED EVALUATION OF THE AMENDED PROJECT**

Aspect	Outcome of Assessments
Biodiversity	<p>The amended Project has led to further significant avoidance of impacts to native vegetation and threatened species and communities, including SAI entities.</p> <p>Specifically, the amended Project has:</p> <ul style="list-style-type: none"> <li>• Avoided a further 366.07 ha of native vegetation by eliminating any impacts to PCT 26, PCT 44 and PCT 160;</li> <li>• Reduced ecosystem offset credit liability by 44% (18.354 credits);</li> <li>• Avoided threatened species and threatened species' habitat, including: <ul style="list-style-type: none"> <li>◦ Fully avoided impacts to the Slender Darling-pea (<i>Swainsona murrayana</i>) and Little Eagle (<i>Hieraaetus morphnoides</i>);</li> <li>◦ Significantly reduced the potential for impacts to habitat associated with the Mossgiel Daisy (<i>Brachyscome papillosa</i>) and Chariot Wheels (<i>Maireana cheelii</i>), reduced by 86% and 97% respectively; and</li> </ul> </li> <li>• Commensurately, the species offset credit liability has reduced by 94% (118,153 credits).</li> </ul> <p>The updated mitigation and management measures in the Amended BDAR reflect the Applicant's commitment to conserve biodiversity.</p>
Aboriginal Cultural Heritage	<p>The amended Project has resulted in a reduction in impacts on Aboriginal cultural heritage. Specifically:</p> <ul style="list-style-type: none"> <li>• The number of identified sites that may be subject to direct impacts has been reduced by 92% (from 13 to one (KK-046, an isolated artefact)); and</li> <li>• Similarly, the number of sites within the micro-siting corridor that may be subject to potential impact has reduced by 69% (from 74 to 23).</li> </ul> <p>This reflects a focus by the Applicant to avoid or minimise impacts to Aboriginal cultural heritage when amending the Project layout.</p>
Noise	<p>The removal and relocation of WTGs in proximity to the Yanga SCA has reduced predicted noise levels to below 16 dB(A), meeting relevant criteria with no adverse noise impacts expected. Operation of the amended Project's 114 WTGs will not exceed the 35 d(B) noise threshold at any sensitive receivers. Operational noise from the BESS will not exceed the thresholds specified in the Noise Policy for Industry at any sensitive receivers. Operational traffic noise is expected to be insignificant. Construction noise levels will comply with the NSW Interim Construction Noise Guidelines at all sensitive receivers. Construction traffic noise will comply with the NSW Road Noise Policy.</p> <p>Cumulative noise impacts associated with operation of the Project in conjunction with the proposed Wilan Wind Farm (directly north of the Project) and Baldon Wind Farm (directly east of the Project) are not anticipated.</p>

Aspect	Outcome of Assessments
Traffic and Transport	<p>The amended Project has reduced impacts to traffic and transport. The reduction in the number of WTGs and disturbance footprint, will result in fewer heavy vehicle (including OSOM) movements. Likewise, the construction period has reduced by 6 months, minimising the duration of potential traffic impacts. Site access points have also been reduced from four to two, which will have a positive influence on local traffic during construction. Similarly, the removal of the transport route from the Port of Newcastle has reduced impacts including fewer upgrades required and elimination of impacts to receivers along that transport route. Only four locations along the transport route will require upgrading to facilitate the movement of OSOM vehicles. Strategic designs for these have been provided.</p>
Landscape and Visual	<p>The amended Project has reduced the number of visible WTGs in the landscape. This will further reduce impacts to residential dwellings and public viewpoints. Obstacle and ancillary lighting impacts have been assessed and will be mitigated and managed accordingly, including prevention of light spill, lighting designed to comply with relevant guidelines and, generally, limiting lighting required for the Project (with consideration of safety requirements).</p>
Aviation	<p>The amended Project does not result in any significant changes to the potential impacts to aviation and airspace that were presented in the EIS. The amended Project maintains the avoidance of and, in some instances, has reduced aviation impacts (i.e., to air routes and Grid LSALT; Uncertified Aerodromes; Potential wake turbulence; Airspace protection, aviation facilities and radar installations). A lighting plan has been recommended by the CASA. The Applicant will develop an Obstacle Lighting Plan; however, will do so with consideration of the impacts that night lighting may have on adjacent environments (e.g., Yanga SCA) and sensitive receivers (with consideration of safety requirements). This Obstacle Lighting Plan will be developed in consultation with CASA, NPWS, nearby neighbours and other relevant stakeholders.</p>
Telecommunications	<p>The amended Project includes the relocation of WTGs that were in proximity of three point-to-point links and associated radiocommunications towers. No impacts to telecommunications assets or services are expected. The Applicant has committed to maintaining the operational performance of NPWS radio links. As necessary, the Applicant will implement measures to avoid and/or manage operational issues that may occur to point-to-point links or mobile radio performance during operation of the Project in response to NSW NPWS advice.</p>
Water Resources, Hydrology and Flooding	<p>The amended Project has been assessed for impacts on and due to local hydrology and flooding. The updated assessment has concluded that:</p> <ul style="list-style-type: none"> <li>• Local overland flows traversing the Project area are of low velocity;</li> <li>• There is only low hazard (H1 to H3) in areas affected by Abercrombie Creek flow path;</li> <li>• Potential flood impacts caused by the development of the Project are considered non-detrimental;</li> <li>• A Probable maximum Flood (PMF) event would result in a significant portion of the Project area affected; however, flows are typically of low velocity. Some development areas may be affected by 0.5-1 m water depths and H3 hazards during a</li> </ul>

Aspect	Outcome of Assessments
	<p>PMF event, while small areas may experience 1-2 m water depths and H4 hazard during a PMF event; and</p> <ul style="list-style-type: none"> <li>Breakout flows from the Murrumbidgee River do not affect water levels or flood risk within the Project area during extreme flood events.</li> </ul> <p>Emergency management procedures may be required to mitigate risks associated with access or isolation during flood events.</p>
Soils and Agriculture	<p>The reduction in the disturbance footprint of the amended Project has reduced the area of agricultural land that will be impacted and, commensurately, has reduced impacts to agricultural productivity.</p> <p>The potential loss of agricultural income during construction has reduced from about \$950,000 (over 24 months) to about \$532,000 (over 18 months). Importantly, this potential loss is primarily driven by the landowner of the larger lot within the Project Area deciding to destock his property during construction. The potential loss of agricultural income during operations has been reduced from about \$5,000 per annum (p.a.) to about \$9,00 p.a.</p> <p>Any loss of agricultural productivity is significantly offset by the income the landowners will receive through lease payments from the Applicant.</p> <p>On a regional scale, the amended Project layout has significantly reduced any potential impacts to land, soil and agricultural productivity (which were negligible for the EIS project).</p>
Hazards	<p>The amended Project layout of the WTGs near the Willowvale Rest Area did not satisfy the HIPAP 4 risk criteria for active open space (i.e.10 pmpy). The amended PHA found that the risk criteria would be satisfied if WTG 177 is removed or relocated. Therefore, it was recommended that WTG 177 be micro-sited 50 m to the south of the current location.</p> <p>DPHI requested clarification on whether the 200 MW/800 MWh BESS could fit within the proposed BESS area footprint, with consideration of the minimum separation distance required between BESS units. The Amended PHA includes an indicative layout for a 200 MW / 800 MWh BESS with 3 m separation distance between BESS units within the 400 m x 300 m BESS compound. This demonstrates that there is adequate area within the BESS compound for the BESS units and inverters associated with the 200 MW/800 MWh BESS.</p>
Economic	<p>Although there is an overall reduction in the level of economic activity to be generated during the operational phase, the amended Project will still significantly contribute to the regional and NSW economies</p>
Cumulative impacts	<p>Given the overall reduction in the scale of the amended Project, no additional cumulative impacts have been identified throughout this assessment or the accompanying technical assessments.</p>

## 8. REFERENCES

- AEMO. (2023). *2023 Electricity Statement of Opportunities: A report for the National Electricity Market*. Retrieved from [https://aemo.com.au/-/media/files/electricity/nem/planning\\_and\\_forecasting/nem\\_esoo/2023/2023-electricity-statement-of-opportunities.pdf](https://aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/nem_esoo/2023/2023-electricity-statement-of-opportunities.pdf)
- AEMO. (2024). *2024 Integrated System Plan: A roadmap for the energy transition*. Retrieved from <https://aemo.com.au/consultations/current-and-closed-consultations/draft-2024-isp-consultation>
- AEMO. (2025). *2025 Electricity Statement of Opportunities*. Retrieved January 2026, from [https://www.aemo.com.au/-/media/files/electricity/nem/planning\\_and\\_forecasting/nem\\_esoo/2025/2025-electricity-statement-of-opportunities.pdf](https://www.aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/nem_esoo/2025/2025-electricity-statement-of-opportunities.pdf)
- Andrews, R. J. (2025). *OSOM Route Study Assessment Report*.
- Arriscar Pty Ltd. (2024). *Preliminary Hazard Analysis of Keri Keri Wind Farm and BESS*.
- Australian Institute for Disaster Resilience. (2017). *Australian Disaster Resilience Handbook 7 Managing the Floodplain: A Guide to Best Practice in Flood Risk Management in Australia*.
- Austrroads. (2019). *Guide to Traffic Management Part 6: Intersections, Interchanges, and Crossings'* .
- Austrroads. (2020). *Guide to Traffic Management Part 3: Traffic Studies and Analysis*.
- Austrroads. (2021). *Guide to Road Design Part 4A: Unsignalised and Signalised Intersections*.
- Austrroads. (2023). *Guide to Road Design Part 5: Drainage-General and Hydrology Considerations* .
- Aviation Projects. (2024). *Aviation Impact Assessment - Keri Keri Wind Farm*.
- BMT. (2024). *Keri Keri Wind Farm Flood Assessment*.
- BoM. (2006). *Guidebook to the Estimation of Probable Maximum Precipitation: Generalised Southeast Australia Method*.
- CASA. (2021). *Advisory Circular 139 E-01 V1.0: Reporting of Tall Structures*. Retrieved January 2026, from <https://www.casa.gov.au/sites/default/files/2021-12/advisory-circular-139e-01-reporting-of-tall-structures.pdf>
- CASA. (2022). *Advisory Circular 139 E-05 V1.1: Obstacles (Including Wind Farms) Outside the Vicinity of a CASA Certified Aerodrome*.
- CASA. (2022). *Advisory Circular 91-02 V1.2: Guidelines for Aeroplanes with MTOW Not Exceeding 5,700 kg – Suitable Places to Take Off and Land*.
- CASA. (2025). *Advisory Circular 91-10 V1.6: Operations in the Vicinity of Non-controlled Aerodromes* .
- CEC. (2023). *Power Playbook: Accelerating Australia's Clean Energy Transformation*. Clean Energy Council .

- DCCEEW. (2023). *National Light Pollution Guidelines for Wildlife*. Retrieved December 2025, from <https://www.dcceew.gov.au/sites/default/files/documents/national-light-pollution-guidelines-wildlife.pdf>
- DECC. (2006). *NSW Assessing Vibration: A Technical Guideline* .
- DECCW . (2010b). *Code of Practice for the Aboriginal Archaeological Investigation of Aboriginal Objects in NSW*.
- DECCW. (2010a). *Aboriginal Cultural Heritage Consultation Requirements for Proponents*.
- DECCW. (2011). *NSW Road Noise Policy*.
- DPHI. (2023). *Flood Risk Management Guideline FB02: Flood Function*.
- DPHI. (2024). *NSW DPHI Wind Energy Guideline, Technical Supplement for Noise Assessment*.
- DPIE. (2022). *Cumulative Impact Assessment Guidelines for State Significant Projects*.
- EPA. (2017). *Noise Policy for Industry*.
- ERM. (2022a). *Winterbourne Wind Farm Environmental Impact Statement*. Retrieved from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10471%2120221212T225834.796%20GMT>
- ERM. (2024). *Conceptual Soil and Water Management Plan*. Retrieved December 2025, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240419T003038.666%20GMT>
- ERM. (2024). *Keri Keri Farm Environmental Impact Statement*. Sydney NSW: Environmental Resources Management Australia Pty Ltd.
- ERM. (2024). *Keri Keri Wind Farm Bushfire Risk Assessment*.
- ERM. (2024). *Keri Keri Wind Farm Environmental Impact Statement*. Sydney: ERM.
- ERM. (2024). *Keri Keri Wind Farm: Biodiversity Development Assessment Report*. Retrieved December 2025, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240419T003031.588%20GMT>
- ERM. (2024a). *Keri Keri Wind Farm Aboriginal Cultural Heritage Assessment Report*.
- ERM. (2024b). *Keri Keri Wind Farm Noise and Vibration Impact Assessment*. Acciona Energy Australia.
- ERM. (2025). *Keri Keri Wind Farm Amendment Report*.
- ERM. (2025). *Keri Keri Wind Farm: Response to Submissions*.
- Gillespie Economics . (2024). *Keri Keri Wind Farm: Economic Assessment* . Retrieved December 2025, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240419T001529.831%20GMT>
- Graham, P., Hayward, J., & Foster , J. (2025). *GenCost 2024-25*. CSIRO.
- ICOMOS. (2013). *The Australia International Council on Monuments and Sites, Charter for Places of Cultural Significance* .

- Middleton Group. (2023). *Keri Keri Wind Farm Telecommunications Impact Assessment* .
- Moir. (2024). *Keri Keri Wind Farm: Landscape and Visual Impact Assessment*. Retrieved December 2025, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240419T003033.092%20GMT>
- National Airports Safeguarding Advisory Group. (2012). *National Airports Safeguarding Framework, Guideline D: Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation*. Retrieved January 2026, from [https://www.infrastructure.gov.au/sites/default/files/documents/4.1.3\\_Guideline\\_D\\_Wind\\_Turbines.pdf](https://www.infrastructure.gov.au/sites/default/files/documents/4.1.3_Guideline_D_Wind_Turbines.pdf)
- NSW DPE. (2016). *Wind Energy: Visual Assessment Bulletin | For State significant wind energy development*. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/wind-energy-visual-assessment-bulletin.pdf>
- NSW DPE. (2023). *Dark Sky Planning Guideline*. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/dark-sky-planning-guideline.pdf>
- NSW DPE. (2023). *Riverina Murray Regional Plan 2041*. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/riverina-murray-regional-plan-2041.pdf>
- NSW DPHI. (2024). *Wind Energy Guideline*. Department of Planning, Housing and Infrastructure. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/wind-energy-guideline.pdf>
- NSW DPI. (2013). *Infrastructure proposals on rural land: Primefact 1063, second*. Retrieved December 2025, from [https://www.dpi.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0020/359030/infrastructure-proposals-on-rural-land.pdf](https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0020/359030/infrastructure-proposals-on-rural-land.pdf)
- NSW DPI. (2017). *Agricultural Land Use Mapping Resources in NSW - User's guide: Primefact 1538 first edition* . Retrieved December 2025, from [https://www.dpi.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0007/711493/Agricultural-Land-Use-Mapping-Resources-in-NSW-User-s-Guide.pdf](https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0007/711493/Agricultural-Land-Use-Mapping-Resources-in-NSW-User-s-Guide.pdf)
- NSW DPIE. (2020). *Biodiversity Assessment Method*. Retrieved June 2025, from <https://www.environment.nsw.gov.au/publications/biodiversity-assessment-method-2020>
- NSW DPIE. (2020). *Developments Adjacent to National Parks and Wildlife Service Lands: Guidelines for Consent and Planning Authorities*. Retrieved December 2025, from <https://www.environment.nsw.gov.au/sites/default/files/developments-adjacent-npws-lands-200362.pdf>
- NSW DPIE. (2021). *Cumulative Impact Assessment Guidelines for State Significant Projects*. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/cumulative-impact-assessment-guidelines-for-ssp.pdf>

- NSW DPIE. (2022). *State Significant Development Guidelines – Preparing an Amendment Report*. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/ssd-guidelines-preparing-an-amendment-report.pdf>
- NSW Government. (2021). *State Environmental Planning Policy (Resilience and Hazards)*.
- NSW ICNG. (2009). *Interim Construction Noise Guideline 2009*.
- NSW OEH. (2012). *The land and soil capability assessment scheme: A general rural land evaluation system for New South Wales*. Retrieved December 2025, from [https://s3.ap-southeast-2.amazonaws.com/oeh-prod-cloudstorage/resources/66737459-cd23-438d-bf7c-ef5880b01313/20120394lsc2.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAIXHLCNGLM7VP7UOQ%2F20251215%2Fap-southeast-2%2Fs3%2Faws4\\_request&X-Amz-Date](https://s3.ap-southeast-2.amazonaws.com/oeh-prod-cloudstorage/resources/66737459-cd23-438d-bf7c-ef5880b01313/20120394lsc2.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAIXHLCNGLM7VP7UOQ%2F20251215%2Fap-southeast-2%2Fs3%2Faws4_request&X-Amz-Date)
- NSW OEH. (2013). *Interim protocol for site verification and mapping of biophysical strategic agricultural land*. Retrieved December 2025, from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/interim-protocol-for-site-verification-and-mapping-of-biophysical-strategic-agricultural-land.pdf>
- NSW OEH. (2019). *Review of ARR Design Inputs for NSW*.
- OEH. (2011). *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*.
- RTA. (2002). *Guide to Traffic Generating Development*.
- SA EPA. (2021). *South Australia Environment Protection Authority's Wind Farms Environmental Noise Guidelines* .
- Standards Australia.
- Tremain Ivey Advisory. (2024). *Keri Keri Wind Farm: Agricultural Impact Assessment*. Retrieved December 2025, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240419T003038.054%20GMT>
- TTPP. (2024). *Keri Keri Wind Farm Traffic and Transport Impact Assessment*.



APPENDIX A

AMENDED PROJECT DESCRIPTION



## APPENDIX A AMENDED PROJECT DESCRIPTION

### 1. PROJECT OVERVIEW

The Project involves the construction, operation, maintenance, and decommissioning of a wind farm, with up to 114 wind turbine generators (WTGs), together with associated and ancillary infrastructure.

The Project consists of the following key components, which are also summarised in **Table 1-1**:

- Up to 114 WTGs, each comprising:
  - Three blades mounted to a rotor hub (hub height of up to 200 m) on a nacelle above a tubular steel tower, with a blade tip height (blade length plus hub height) of up to 291.5 m above ground level (AGL);
  - A gearbox and generator assembly housed in the nacelle; and
  - Adjacent hardstands for use as crane pads, assembly and laydown areas;
- Electrical infrastructure comprising:
  - A battery energy storage system (BESS) of up to 200 MW/800 MWh (approximately four hours of storage);
  - Three 33/330 kV electrical substations, including control room, communications tower, transformers, circuit breakers, switches, lighting protection and other ancillary equipment;
  - 195.6 km of underground 33 kV electrical reticulation connecting the WTGs to the onsite substations (where practicable, these are generally following site access tracks);
  - 16.21 km of 330 kV overhead transmission line connecting the three substations to a new electrical switchyard (including circuit breakers, switches and other ancillary equipment) to provide connection to the planned NSW-South Australia interconnector, Project EnergyConnect currently under construction;
  - 0.7 km of 220 kV or 330 kV overhead transmission line connecting the switching station to proposed connection point.
- Ancillary infrastructure:
  - Two site access points with one along Sturt Highway and one on Keri Keri Road;
  - One operation and maintenance (O&M) facilities and two security huts;
  - Two biosecurity wash bays;
  - 116.5 km of internal access tracks connecting the WTGs and associated Project infrastructure with the public road network;
  - Decommissioning of three temporary meteorological monitoring masts and installation of up to three permanent meteorological monitoring masts for power testing. The permanent monitoring masts will be located close to a WTG location and will have a maximum height of approximately 200 m AGL; and



- Upgrades to public roads and intersections required for the delivery of oversize and overmass (OSOM) WTG components, transformers and associated construction-phase materials and vehicular movements.

The following temporary elements will be required during the construction phase of the Project:

- Two temporary construction site compounds, comprising site buildings and facilities for construction contractors / equipment, site offices, car parking and amenities for the construction workforce;
- Two mobile concrete batching plants to supply concrete for WTG footings and substation construction works;
- Earthworks for access tracks, WTG platforms and foundations;
- One workers' accommodation compound and carpark;
- Four hardstand laydown areas for the storage of construction materials, plant, and equipment;
- Up to three temporary meteorological monitoring masts. The temporary monitoring masts will be located close to a WTG location with a maximum height of approximately 200 m AGL;
- External water supply and storage for concrete batching and construction activities;
- The transport, storage and handling of fuels, oils and other hazardous materials for construction and operation of wind farm infrastructure; and
- Beneficial reuse of materials won from within the Development Footprint during cut and fill and WTG foundation excavation works for use in access track, hardstands and foundation material.

The construction period would be 18 months, with peak construction activities over approximately 12 months. Ultimately, the project will be decommissioned, and the Project Area will be rehabilitated.

The following sections describe the amended Project elements as well as services. Minor changes may be made during the detailed design phase and in response to commercial and technical decisions; however, will remain within the impacts identified in the Amendment Report and accompanying technical assessments.



TABLE 1-1 SUMMARY OF KEY PROJECT COMPONENTS

Project Component	Description	Amended Project
<b>Project Footprint</b>		
Project Area	Total area to which the Application applies	18,006 ha, reduced by 6 ha
Disturbance Footprint	The area of land that is directly impacted by the Project including: all temporary and permanent disturbance areas; and all areas where vegetation may be removed during project construction and operation	Up to 764 ha, reduced by 373 ha
Permanent Disturbance Footprint	The area of land that will be subject to permanent alteration as a result of the Project's infrastructure until decommissioning	Up to 491 ha, reduced by 83 ha
Micro-siting Corridor	An identified area, generally 100 m buffered from the Disturbance Footprint, within which the project infrastructure can be micro-sited	Generally, 100 m either side of Disturbance Footprint; however, this has been reduced in areas to avoid impacts to Aboriginal cultural heritage
<b>WTGs</b>		
Rotor diameter	Up to 183 m	Up to 114 WTGs, reduced by 41 WTGs, reduction in WTG hardstand disturbance area
Blade length	Up to 91.5 m	
Uppermost blade tip	Up to 291.5 m	
Tower (hub) height	200 m	
WTG hardstand disturbance area	Approx. 2.41 ha per WTG required for construction	
<b>Ancillary Infrastructure</b>		
New 330 kV transmission line	Towers up to 70 m high, spaced approx. 400 m (subject to terrain), with 60 m easement	16.21 km, reduced by 3.79 km



Project Component	Description	Amended Project
New 220 kV or 330 kV transmission line (Switching Station to proposed connection point)	Towers up to 70 m high, spaced approx. 400 m (subject to terrain), with 60 m easement Connection will be either 220 kV (Switching Station to existing transmission line) or 330 kV (Switching Station to proposed PEC transmission line)	Up to 0.7 km, increase of 0.7 km
Underground 33 kV lines	Trenching for underground electrical lines will be approx. 0.6 m wide per circuit by 1.0 m deep	195.6 km, increase of 20.3 km
Overhead 33 kV lines	Where ground conditions are not suitable for open cut trench installation, overhead single circuit electricity lines will be installed using concrete poles, with a 30 m easement	0 km, removed, reduced by 64.5 km
33/330 kV Substation	190 m x 240 m + 35 m APZ all sides	No change in number, locations have changed but within micro-siting corridor, reduced in area by 4.32 ha
Switching Station	200 m x 300 m + 35 m APZ all sides	No change
200 MW/800 MWh BESS	400 m x 300 m + 35 m APZ all sides	No change in number, location has changed but within micro-siting corridor
Operations & Maintenance (O&M) Facility	100 m x 100 m + 35 m APZ all sides	1, reduced by 2
Security hut	20 m x 20 m at each site access point	2, reduced by 2
Biosecurity wash bays	30 m x 30 +15 m batters on all sides at each site access point	2, reduced by 2
New internal access tracks and drainage	Approximately 10 – 13 m wide including 4 – 8.5 m roadway plus shoulders and drainage as required	116.5 km, reduced by 31.8 km
Site access points	Site access off Keri Keri Road and Sturt Highway	2, reduced by 2
Transport route	Upgrades will be required at several locations along the route	Port of Newcastle removed as an option, which has



Project Component	Description	Amended Project
		decreased the number of road upgrades required
Permanent meteorological masts (with concrete footings for mast and guy wires)	Sensor height at up to 200 m on approximately 3 m x 3 m concrete foundation	3, reduced by 1
<b>Temporary Facilities</b>		
Temporary worker accommodation camp	200 m x 200 m +15 m batters	No change in number, locations have changed but are still within micro-siting corridor, areas have increased
Concrete batching plants	200 m x 200 m +15 m batters	
Construction compound (site office and storage areas)	200 m x 200 m +15 m batters	
Laydown Areas	<ul style="list-style-type: none"> <li>• North: 400 m x 200 m +15 m batters;</li> <li>• Central: 400 m x 200 m +15 m batters;</li> <li>• West: 300 m x 200 m +15 m batters; and</li> <li>• East: 300 x 200 m +15 m batters</li> </ul>	4, increased by 1
Borrow pit	200 m x 200 m + 15 m batters	0, removed, reduced by 1
Construction carpark	200 m x 200 m +15 m batters	2, increased by 2
Temporary meteorological masts (with concrete footings for mast and guy wires)	Sensor height at up to 200 m on approximately 3 m x 3 m concrete foundation.	3, reduced by 1
APZ requirements	Minimum 20 m up to 35 m on all sides	No change



## 2. PROJECT COMPONENTS AND LAYOUT

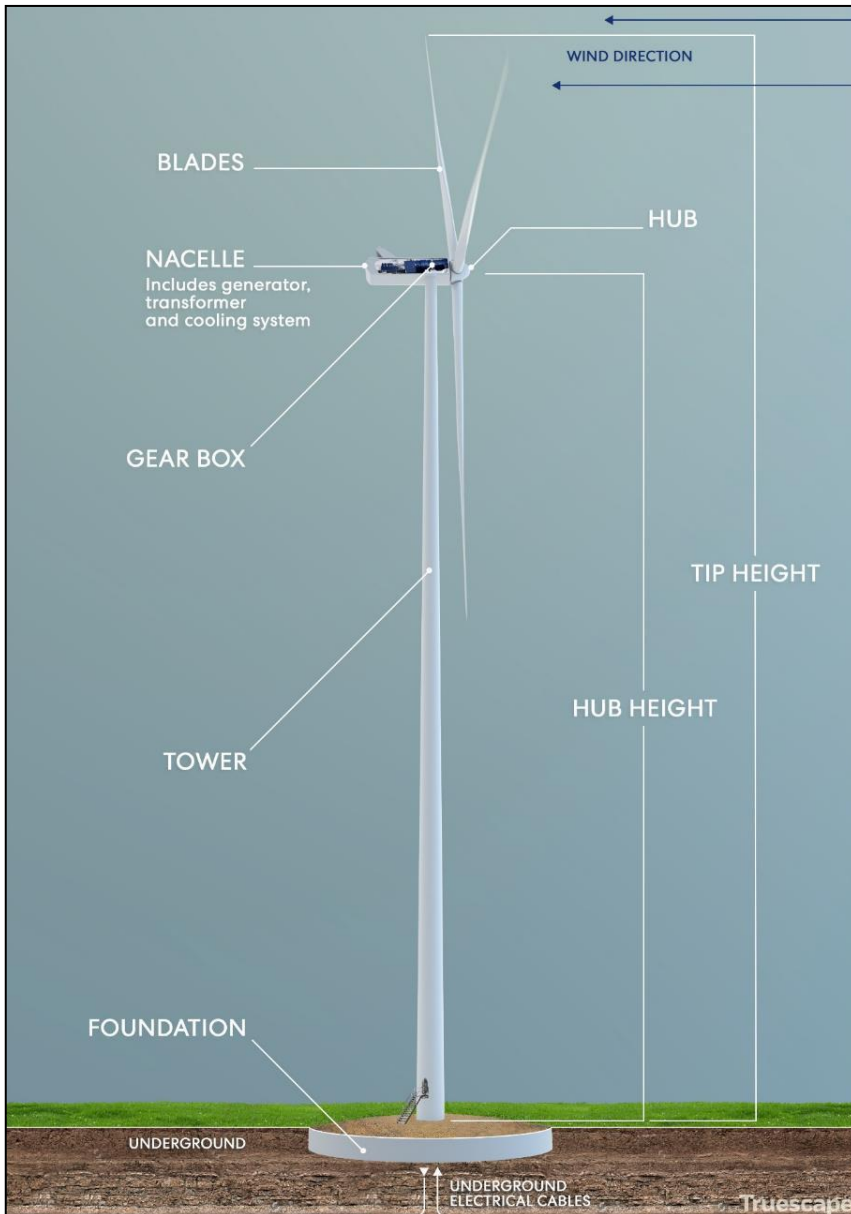
### 2.1 WIND TURBINE GENERATORS

The Project will involve the construction and operation of up to 114 WTGs, compared with an original 155 WTGS. The WTG model selected for the Project is the Nordex N163-5.X which, based on current technology, represents the 'worst-case' impact assessment for the Project; **Table 2-1** details specifications of the WTG model and **Figure 2-1** illustrates the typical components of a WTG.

**TABLE 2-1 WIND TURBINE GENERATOR SPECIFICATIONS**

Feature	Specification
Make / Model / Power	Nordex / N163-5.X / 5.7 MW
Power Regulation	Pitch regulated with variable speed
<b>Operating data</b> Rated power Cut-in wind speed Cut-out wind speed Wind class Standard operating temperature range	5,700 MW 3 metres per second (m/s) 26 m/s IEC 2A -20°C to 43°C
<b>Sound power</b> Maximum	109.2 dB(A)
<b>Rotor</b> Rotor diameter Swept area Brake system	183 m <sup>2</sup> 26,302.2 m <sup>2</sup> Aerodynamic brake (pitch) and holding disc brake
Tip height	Up to 291.5 m
Blade Length (incl. nacelle)	Up to 91.5 m
Hub height	Up to 200 m
Maximum clearance (space between ground and lowest point of blade)	100 m
<b>Electrical</b> Frequency Converter	50 hertz
<b>Gearbox</b> Type	3-stage

FIGURE 2-1 TYPICAL COMPONENTS OF A WIND TURBINE GENERATOR (INDICATIVE, NOT TO SCALE)



Aviation Projects (2025) recognises the Civil Aviation Safety Authority's submission and has recommended that a lighting plan be developed in accordance with the 'NASF Guideline D'. The lighting plan would identify which WTGs require obstacle lighting. To achieve visual consistency throughout the landscape, and to minimise noise generation, the WTGs will include:

- Uniformity in the colour, design, height and rotor diameter;
- Use of simple muted colours and non-reflective materials to reduce visibility and avoid drawing the eye (i.e. RAL 7035 light grey); and
- Avoidance of unnecessary lighting, signage and logos.



**Table 2-2** provides the central coordinates of the WTGs for the Project, noting that six of the original WTGs have been relocated

**TABLE 2-2 WIND TURBINE GENERATOR COORDINATES**

WTG No.	Coordinates (GDA94 Zone 56)		WTG No.	Coordinates (GDA94 Zone 56)	
	X	Y		X	Y
9	776712	6154585	79	765585	6150374
10	777235	6154445	80	766090	6150220
11	777739	6154151	81	766797	6150053
12	778265	6153967	82	767309	6149937
19	775644	6153080	83	767849	6149793
20	776137	6152948	84	768327	6149663
21	776616	6152819	85	768966	6149862
22	777094	6152691	86	769515	6149792
23	777573	6152563	87	769886	6149434
24	778052	6152434	88	770190	6148961
25	778502	6152311	89	770788	6149125
26	768627	6153184	90	771646	6148990
27	769125	6153101	91	772170	6148918
28	769621	6153020	92	772591	6148526
29	770073	6152740	94	773194	6148379
30	770580	6152644	95	773678	6148241
31	771113	6152633	96	774172	6148191
32	771619	6152487	97	774825	6147916
33	772086	6152240	98	775302	6147798
34	772583	6152157	107	764786	6148896
36	773638	6151825	108	765271	6148750
38	774640	6151511	117	770038	6147556
39	775235	6151391	118	770654	6147306
40	775720	6151284	119	771175	6147245
41	776122	6151011	124	773353	6146354
42	776458	6150657	125	773857	6146177
43	777279	6150837	126	774365	6145929
44	777655	6150473	127	774994	6145873



# ERM

WTG No.	Coordinates (GDA94 Zone 56)		WTG No.	Coordinates (GDA94 Zone 56)	
	X	Y		X	Y
45	778309	6150548	130	764552	6147404
46	778816	6150442	131	765026	6147235
47	779358	6150374	137	768159	6145758
48	779836	6150560	139	768714	6145769
49	780315	6150745	140	769261	6145745
50	780762	6150916	141	769914	6145594
51	767466	6151792	142	770385	6145455
52	767920	6151502	143	770860	6145328
53	768557	6151599	144	771343	6145208
54	769172	6151448	145	771826	6145132
55	769740	6151276	146	772304	6144996
57	770722	6150741	147	772804	6145031
58	771318	6150757	148	773246	6144784
59	771763	6150516	149	773745	6144650
62	772983	6149996	150	774122	6144327
63	773508	6150038	151	774648	6143958
64	774136	6149899	162	769730	6143693
65	774622	6149770	163	770346	6143737
66	775132	6149633	164	770890	6143591
67	775618	6149442	165	771384	6143461
68	776139	6149285	166	771974	6143306
69	776677	6149177	167	772573	6143227
70	777176	6149085	168	773031	6143027
71	777687	6148949	170	773648	6142859
72	778214	6148899	177	768130	6153268
73	778773	6148816	178	766783	6151877
74	779216	6148669	181	768663	6143676
75	779767	6148878	182	769253	6143379
78	765070	6150528	183	766212	6151947

### 2.1.1 FOUNDATIONS

The exact size and type of tower foundation will be based on subsurface soil conditions and the results of geotechnical surveys undertaken during the detailed design phase, prior to commencement of construction.

The three common types of foundations used for WTGs are gravity foundations, rock anchors and pile foundations or a combination of these depending on geotechnical conditions. The most common type of foundation is the gravity foundation in which an area is excavated suitable to support the burying of a 'pedestal' design of concrete and reinforced steel sufficient to create a stable foundation. These are typically 3-5 m deep and 20 to 30 m in diameter depending on the tower design. The volume can be between 600-900 m<sup>3</sup> depending on the turbine, geotechnical conditions and other environmental factors.

WTG foundations are excavated using mechanical equipment, assisted by controlled blasting if required due to ground conditions. Topsoil and spoil from excavations will be stockpiled for reuse to backfill over the foundation and for vegetation rehabilitation of the Project Area. Excess materials will be utilised at other parts of the Project Area or exported offsite for beneficial reuse at an approved location or disposed of at a licensed landfill facility.

**Figure 2-2** shows a typical gravity foundation. The gravity foundation is then backfilled so that only the connection to the base tower section is visible above ground as shown in **Figure 2-3**.

FIGURE 2-2 TYPICAL FOUNDATION BEING CONSTRUCTED





FIGURE 2-3 TYPICAL FOUNDATION POST-CONSTRUCTION



### 2.1.2 HARDSTANDS

A hardstand will be constructed adjacent to the base of each WTG to enable the assembly and erection of the tower, nacelle and blade components. Each hardstand will consist of gravel, which will be compacted and graded suitably to form a roughly rectangular area. The hardstand will include arrangements for crane boom assembly and support pad to store blades prior to construction. The hardstand area will be level with the WTG foundation with a bearing capacity of 250 kilopascal. The towers, nacelles and blades will be lifted off delivery trucks using mobile cranes. Larger cranes will then assist in the installation of the tower sections, nacelle and blades. **Figure 2-4** illustrates a typical hardstand area.

FIGURE 2-4 TYPICAL HARDSTAND AREA



The total area of each WTG hardstand during construction will be approximately 2.41 ha, compared with the original 2.83 ha, subject to the topography of the surrounding land. After rehabilitation following the construction process, the hardstand area will reduce to approximately 0.67 ha.

A portion of the hardstand will be maintained during Project operations to allow for maintenance and future decommissioning of the WTGs. There may be an opportunity to revegetate the assembly portions of the hardstand to allow grazing activities to resume in these areas if not required for wind farm operations.

## 2.2 ELECTRICAL RETICULATION

### 2.2.1 HIGH-VOLTAGE TRANSMISSION LINES

A 330 kV single or double circuit, three phase, twin conductor bundle overhead transmission line connection with a total length of approximately 16.21 km, compared with the original 20 km, will connect the Project to a new switching station in the south of the Project Area and subsequently to Project EnergyConnect.

The proposed design of the overhead 330 kV transmission line is as follows:

- Up to 70 m high, single circuit lattice steel tower, spaced approximately 400 m apart, subject to terrain and final design;
- Towers generally require concrete footings for each of the four legs and a temporary disturbance area of approximately 30 m in diameter during construction;
- Twin aluminium conductor bundles attached to ceramic insulators in the centre and the ends of the tower cross arm;
- Each conductor bundle will include orange balls for visual identification and an earth shield wire/s, protecting the line from lightning strikes; and
- A 60 m wide easement with unformed access tracks up to 3 m wide (equivalent to a farm track) to facilitate operational access by Transgrid (for maintenance, repair and hazard reduction).

Further to this, 0.7 km of 220 kV or 330 kV overhead transmission line is proposed to connect

the switching station to the proposed connection point. Towers would be up to 70 m high, spaced approximately 400 m apart (subject to terrain), with a 60 m easement. Connection will be either 220 kV (Switching Station to existing transmission line) or 330 kV (Switching Station to proposed Project EnergyConnect transmission line).

**Figure 2-5** provides an example of the typical steel lattice tower structure proposed for the transmission lines. It may also be possible to utilise a monopole design in place of a steel lattice tower. Monopoles would be up to 50 m high and spaced approximately 200 – 250 m apart, subject to terrain. The monopoles would utilise a concrete footing.

Access to the transmission lines for construction will be via existing property accesses and farm tracks. For the safe operation of the transmission lines, certain activities will be restricted within the easement area such as planting and growing trees, construction of buildings, or erection of antennae or masts. The transmission lines will not affect the ongoing use of the land for agricultural purposes such as grazing.

**FIGURE 2-5 TYPICAL STEEL LATTICE TOWER STRUCTURE**



### 2.2.2 MEDIUM-VOLTAGE RETICULATION

The internal electrical reticulation network, which connects the WTGs to the substations, will comprise approximately 195.6 km of underground 33 kV cables, an increase to the 175.3 km originally proposed. Overhead single circuit electricity lines are no longer proposed for the Project.



WTGs are connected in strings (typically between three to six WTGs per string), which are then connected to the onsite substations. Where possible the cabling will be in underground trenches, which run parallel to the access track. Where deviation from the access track is required due to geotechnical or other constraints, these deviations will be positioned to minimise impact to ecological and heritage areas of high significance.

The trenching for underground electrical cabling will be approximately 0.6 m wide per circuit by 1 m deep, located within a works area of approximately 5 m to accommodate the mobile plant and stockpiling of spoil and bedding sand. Trenches will be progressively backfilled during the construction works.

Prior to excavating the cable trench, the topsoil is stripped and windrowed separately from excavated subsoils to preserve soil structure and the seedbank. The electrical reticulation is placed on bedding sands at approximately 0.75 m below ground level. Once the cables are installed, another layer of sand may be placed above the cable prior to the trench being backfilled with excavated material with the excavated topsoil replaced providing a soil profile that assists revegetation of the disturbed areas. Cables will be protected in accordance with Australian Standard 3000:2007 Electrical Installations.

### 2.2.3 SUBSTATIONS

Three 330 kV substations will be constructed in the Project Area to transform the 33 kV received from the internal electrical reticulation network to the 330 kV transmission voltage.

Each substation would occupy a site with a maximum expected area of 4.56 ha (190 m x 240 m), compared with the original 6 ha per substation, and will contain transformers, associated high voltage switchgear and control and protection equipment as well as a communication tower, and drainage and oil containment system. A security fence will surround the substations. Maintenance lighting will be installed at the onsite substations for night work including emergency operations. Gravel hardstand will be placed under and around the substation compounds to restrict vegetation growth and provide a safe working environment in accordance with the relevant Australian Standards.

Internal structures within the fenced substation compounds will include:

- Control building/control room, switch room approximately 5 m high;
- 33/330 kV power transformers approximately 10 m high;
- Lightning protection masts approximately 25 m high;
- Associated high voltage switchgear including busbars, circuit breakers, disconnectors – approximately 10 m high; and
- Communications tower up to 80 m high.

A 35 m bushfire Asset Protection Zone (APZ) will surround each substation. **Figure 2-6** provides an example of a wind farm substation.

FIGURE 2-6 TYPICAL SUBSTATION



#### 2.2.4 SWITCHING STATION

A switching station with approximate dimensions of 200 m by 300 m for physical electrical components including required earth works will be located within a site with a maximum expected area of 6 ha. The switching station will connect the Project transmission lines to the planned NSW-SA interconnector, Project EnergyConnect, which is currently under construction. A 35 m APZ will surround the switching station. **Figure 2-7** shows an image of a typical wind farm switching station.

FIGURE 2-7 TYPICAL SWITCHING STATION



#### 2.2.5 BATTERY ENERGY STORAGE SYSTEM

A BESS will be located adjacent to the south substation, occupying an area of approximately 12 ha (400 m x 300 m) with 3 m separation between adjacent BESS containers within the BESS compound.

The BESS would utilise lithium-ion technology with a rated capacity of up to 200 MW/800MWh (4 hours), subject to detailed economic and technical considerations. The BESS will likely utilise a pre-assembled and pre-tested, fully integrated system that includes the battery modules, inverters, thermal management system, circuit breakers and other controls.

A Heating, Ventilation, and Air Conditioning (HVAC) system will actively cool the BESS. The BESS will be temperature monitored, and the automated control system will stop its operation if the temperature exceeds pre-set levels to prevent overheating (e.g., if all air conditioning units fail). The BESS will include a gravel surface and a 35 m APZ to minimise the risk of fire escaping from the facility and the risk of external fire affecting the facility.

The model and design specification of the BESS will be determined during detailed design. However, the final model and design specifications will remain within the specifications assessed under the State Environmental Planning Policy Resilience and Hazards in the Preliminary Hazard Analysis (Arriscar, 2024).

**Figure 2-8** provides an illustration of a typical BESS model and layout.

**FIGURE 2-8 TYPICAL 200 MW/800 MWH BATTERY ENERGY STORAGE SYSTEM**



### 2.3 PERMANENT OPERATIONS AND MAINTENANCE FACILITY

One permanent onsite O&M facility, occupying an area of up to 1 ha (100 m x 100 m) within the southern portion of the Project Area (adjacent to the BESS), will be constructed to provide for all O&M activities associated with the Project, as opposed to the three facilities originally proposed.

The buildings of the O&M facility will contain the control room, switch room, and storage shed with workshops. The control room will contain an office, communications equipment, and staff amenities (toilet, kitchen, first aid, potable water supply, etc.).

The compound will also include a static water supply for firefighting/bushfire management as well as a septic or pump out sewerage systems at the temporary workforce accommodation camp and at the O&M facility. Approval will be sought from Murray River Council in accordance with the *Local Government Act 1993*. Guttering and a water tank will collect rainwater. Potable water demand during operations is negligible. Rainwater tanks will be installed at the O&M

facility. It is expected that these will meet the operational potable water demand. Any surplus potable water required will be purchased and carted to site.

The control room, switch room and storage shed will each contain essential fire safety equipment, including fire extinguishers and hose reels. Additionally, there will be a double skinned / banded container set on a concrete base for the storage of oils, greases and other liquid substances with a safety shower on the outside of the building.

Adequate rubbish / waste facilities providing appropriate waste stream separation using onsite skip bins emptied weekly or as required. Waste will not be retained permanently onsite and will be addressed through a Project-specific Waste Management Plan.

Car parking facilities for employee and service vehicles will be located adjacent to the O&M facility. The parking and vehicle manoeuvring areas will be sealed with crushed road base or asphalt.

During the long-term operational phase, the O&M facility will cater for up to 12 permanent staff. Whilst most activity is anticipated to occur during business hours Monday to Friday, access to the Project Area will be required on a 24-hour basis, seven days a week.

The O&M facility will be constructed of low-combustibility or non-combustible materials in accordance with the National Construction Code. The O&M facility will be an insulated, free standing construction with steel frame affixed to a concrete base. The buildings will utilise Colorbond® cladding in a colour shade designed to match the surrounding landscape.

Maintenance lighting will be installed at the O&M facility for night work including emergency operations. All maintenance lighting will be designed to reduce disturbance to neighbouring properties and will be used only when there are staff onsite or during emergencies.

Continuously operating security lighting would be installed on posts up to 3.5 m high adjacent to security fencing and the O&M facility.

**Figure 2-9** provides an example of an O&M facility.

**FIGURE 2-9 TYPICAL OPERATIONS AND MAINTENANCE FACILITY**





## 2.4 SITE ACCESS

### 2.4.1 SITE ACCESS POINTS

The Project Area will be accessed at two locations, rather than the four originally proposed, with one access site along Keri Keri Road along the western boundary and the other along Sturt Highway along the northern boundary.

Each site access point will construct and operate a biosecurity wash bay nearby to sanitise plant, equipment and vehicles entering and exiting the Project Area to reduce the risk of spreading harmful pathogens and contaminants during construction and operation. Both wash bays will be approximately 900m<sup>2</sup> (30 m x 30 m) with 15 m batters on all sides.

Each site access point will also construct and operate a security hut nearby for surveillance of the Project Area boundaries at these points. Each security hut will be approximately 400 m<sup>2</sup> (20 m x 20 m).

### 2.4.2 INTERNAL ACCESS TRACKS

The construction and maintenance of the Project will require construction of up to approximately 116.5 km of new private access tracks within the Project Area, compared with the originally proposed 148.3 km.

The new internal access tracks will connect to existing roads. The tracks will provide ongoing access to the WTGs and other Project infrastructure including the transmission lines. Where practicable, the internal access track network will be aligned along the route of existing farm tracks to reduce impacts to biodiversity and to provide upgraded access for ongoing agricultural activities.

The internal access tracks will typically be 15 m wide including 5.5 m roadway plus shoulders and drainage with localised widening on curves and where required to support transportation of the over-dimensional WTG component vehicles. The internal access tracks will be constructed using unsealed pavements and will be generally in accordance with the Australian Road Research Board Unsealed Roads Manual.

## 2.5 METEOROLOGICAL MONITORING MASTS

The Project includes the commissioning and decommissioning of three temporary met masts for power testing, and installation of up to three permanent met masts, as opposed to four of each as originally proposed. Each met mast will be located close to a WTG location and will have a maximum height of approximately 200 m above ground level. The permanent met masts assist in verifying the performance of the WTGs during operation of the Project.

The met masts consist of a buried concrete base foundation and guy wires which are attached to buried anchor points. These will be marked using three-dimensional coloured objects attached to the wire or cables (for example spheres or pyramids) if necessary. The Project also includes the decommissioning and removal of three existing met masts used during project development to measure the wind resource within the Project Area. Figure 2-10 depicts a typical met mast.

FIGURE 2-10 TYPICAL METEOROLOGICAL MONITORING MAST



## 2.6 TEMPORARY FACILITIES

Construction of the Project will require a range of temporary buildings and facilities for construction personnel and equipment. These will include a construction, mobile concrete batching plants, laydown and storage areas for the temporary storage of construction materials, plant, equipment and WTG components, workers accommodation, and temporary power supply for construction.

Chain link fencing up to 2 m high and CCTV may be used around the temporary construction compounds, concrete batching plants, and materials storage and laydown areas, as required.

All temporary facilities will be removed and will be revegetated / remediated following commissioning, or as agreed with by the landowner.

### 2.6.1 CONSTRUCTION COMPOUNDS

Two construction compounds are proposed where each will be approximately 4 ha (200 m x 200 m) and located in the northern and western regions of the Project Area, compared with 2 ha each in the northern and southern regions as originally proposed. The compounds will comprise of site buildings, offices and amenities.

### 2.6.2 LAYDOWN AREAS

Four laydown areas are proposed in the northern, eastern, central and western regions of the Project Area. The northern and central laydown areas will each be approximately 8 ha (400 m x 200 m) and the eastern and western laydown areas will be approximately 6 ha (300 m x 200 m).



m). The originally proposed three laydown areas each covered an area of approximately 1 ha. The laydown areas will store materials, plant and equipment during construction.

### 2.6.3 CONCRETE BATCHING PLANTS

The foundations for each WTG will be constructed with steel reinforced concrete. Concrete and aggregate will also be used as required for electrical infrastructure, internal access tracks, O&M facilities, substations and the switchyard. Up to two temporary mobile concrete batching plants and rock-crushing facilities will be established within the Project Area. While the exact details of the facilities will be determined closer to construction, the area required for the plant and storage of materials will be approximately 200 m x 200 m, as opposed to the originally proposed 150 m by 100 m.

The temporary mobile concrete batching plants will be designed to produce sufficient concrete quantity for one foundation per working day, and will comprise:

- Cement silos;
- Stockpile areas for the storage of the aggregates, sand and other raw materials;
- Water tanks;
- Wastewater settling pit (to recycle water and prevent cement wash out overflowing onto unsealed ground and entering waterways);
- Parking for truck mixers and pumps;
- Fuel bunker and bunded area for concrete additives; and
- Rock crushing facility.

It is anticipated the cement will be stored in a silo adjacent to the batching process machinery. Concrete agitator trucks will transfer the concrete from the batch plant to the WTG foundation locations. Water to be used for concrete and general Project construction is discussed in

#### **Section 3.4.6.**

Given the demand for concrete and rock for access road and hardstand construction crushing operations will exceed the license threshold of 150 tonnes per day or 30,000 tonnes per year. Therefore, an Environmental Protection Licence from the Environment Protection Authority (under the *Protection of the Environment Operations Act 1997*, will be required. The daily onsite rock crushing capacity will be quantified following pre-construction geotechnical assessments to determine the availability of suitable onsite material.

### 2.6.4 WORKERS' ACCOMMODATION CAMP

One workers' accommodation camp located in the eastern section of the Project Area is proposed onsite covering approximately 4 ha (200 m x 200 m). The camp will accommodate up to 650 Full-time Equivalent (FTE) workers to facilitate 100% of the peak construction workforce.

The workers' accommodation camp will include accommodation and amenity facilities, food and catering facilities, recreational facilities, first aid facilities and telecommunication services for personal use. Accommodation facilities will consist of prefabricated demountable units, that will



be delivered and installed on site. A Project-specific Workforce Accommodation Plan will outline how any impacts to local communities can be avoided, mitigated and/or managed.

### 2.6.5 CONSTRUCTION CARPARKS

Two construction carparks will be located adjacent to the construction compounds and workers' accommodation camp covering approximately 4 ha each (200 m x 200 m) with 15 m batters.

## 3. PROJECT CONSTRUCTION

### 3.1 DURATION AND STAGING

Construction activities will be progressive across the Project Area over a period of approximately 18 months, a reduction from 24 months as originally proposed, with peak construction activities over approximately 12 months.

Construction of the substation, transmission line connection and switching station will be undertaken in parallel with the installation of the WTGs and construction of the O&M facility. Construction of the wind farm may be staged subject to factors including but not limited to the availability of contractors, equipment, workers and housing, equipment transport constraints, equipment and contractor pricing, energy market pricing and availability of energy offtake, project funding requirements, the final project as approved, and relevant development consent conditions. Some of these factors can only be determined after development consent and with further investigations required to inform the project design, procurement and commercialisation. If construction and / or operation is to be undertaken in stages, notification of such will be provided to the Department of Planning, Housing and Infrastructure.

### 3.2 CONSTRUCTION HOURS

Construction of the Project will generally occur in accordance with the hours specified in the 'Interim Noise Construction Noise Guideline' (NSW DECC, 2009), with hours extended on Saturdays, as outlined below:

- Monday to Friday: 7.00am to 6.00pm;
- Saturday: 8.00am to 6.00pm; and
- No works on Sunday or public holidays.

Some out of hours work may be required, including:

- Logistics and safety requirements imposed by relevant regulatory authorities (e.g., NSW Police);
- Blade and tower transport outside of peak traffic conditions on state and regional roads;
- Emergency work to avoid the loss of lives, property, and/or to prevent environmental harm;
- Works that do not cause noise emissions above 35 dB(A) at any nearby non-involved dwellings not located on the site;



- Weather conditions such as high winds during the day necessitating WTG crane lifts at night;
- Temperature conditions requiring concrete pours during the early morning; and
- Extended concrete pours into the evening to complete a foundation.

If a need to work outside the recommended standard hours is identified, it would be carried out in accordance with the Environmental Management Strategy and associated sub-plans.

### 3.3 CONSTRUCTION WORKFORCE

Up to 650 FTE jobs will be generated during construction. Construction personnel are expected to comprise a mix of local workers and specialist contractors likely sourced from outside the region. The Project will develop and use an on-site accommodation camp during construction with the capacity to house the full workforce (refer **Section 2.6.4**).

### 3.4 TRANSPORT ROUTE AND SITE ACCESS

**Figure 6-3** in the Amendment Report shows the preferred access routes for the blades and the other components, in addition to the Project access route for construction and operation vehicles, as described in the below sections. The full amended Traffic and Transport Assessment and the Transport Route Assessment are provided in **Appendix I** of the Amendment Report.

#### 3.4.1 LIGHT VEHICLES

At peak construction, it is estimated that up to 650 FTE employees will be on-site. All workers will be housed within an on-site accommodation camp. Car parking will be provided adjacent to the accommodation (refer **Section 2.6.4**).

#### 3.4.2 HEAVY VEHICLES

Heavy vehicles will be required to transport materials and equipment associated with the Project construction. It is anticipated that heavy vehicles will consist of vehicles up to and including 26 m long semi-trailers and B-Doubles (standard vehicles) and 'truck and dogs', concrete trucks and water tankers. The use of temporary onsite concrete batching plants will reduce the number of external concrete truck movements to and from the Project Area (refer **Section 2.6.3**).

#### 3.4.3 OVERSIZE OVERMASS VEHICLES

There will be several Oversize Overmass (OSOM) vehicle movements to facilitate transport and delivery of major WTG components and large substation equipment (e.g., battery storage, transformers), O&M facility, and water tanks.

Major WTG components to be transported include:

- Blades;
- Hubs;
- Nacelles;



- Power trains;
- Cooler tops; and
- Tower segments.

The Applicant intends to use the Port of Adelaide, SA for the import of Project infrastructure, whereas the Port of Newcastle, NSW was also proposed to be used originally. While the Applicant has assessed the suitability of this transport route from the Port of Adelaide to Project, the impacts have only been considered for the portion of the transport route that falls within the jurisdiction of NSW legislation.

The transport route assessment has identified two transport route options from the Port of Adelaide via the VIC border to the Project Area:

- Route 1 (blades) – VIC border at Robinvale: via Robinvale-Sea Lake Road, Murray Valley Highway, Sturt Highway, and Keri Keri Road; and
- Route 2 (loads under 40 m overall length) – VIC border at Mildura: via Seventh Street, Sturt Highway, and Keri Keri Road.

#### 3.4.4 RESTRICTED ACCESS VEHICLES

Due to the size of the WTG components and some substation components, Restricted Access Vehicles (RAVs) will be required to transport these to the Project Area. RAV deliveries are OSOM and require permits that specify the designated route for travel, the number of escorts required and the time in which the RAVs can travel through certain road zones.

Whilst RAVs will contribute a small percentage of trips for the Project during construction, they will be the most critical from a vehicle access perspective and will require some upgrades to the existing road network. In addition, cranes will be required during construction to facilitate the erection of the WTGs. It is anticipated that the Project will use several cranes at any one time. These will be transported using RAVs.

The final RAV route will depend on further consultation and approval from the relevant road authorities including Transport for NSW and local councils as well as private property owners along the route where widening and blade swing area may extend beyond the road reserve boundary.

#### 3.4.5 ROAD UPGRADES

The Transport Route Assessment (**Appendix I** of the Amendment Report) from the Victorian border to the Project Area, included an assessment of potential road network upgrades required to facilitate delivery of the Project infrastructure to the Project Area. This included a swept path analysis for the transportation of the 91.5 m long blades to identify 'pinch points', and identification of suitable areas where vehicles could pull over for fatigue breaks or emergency parking. Several road upgrades were identified as necessary to facilitate the proposed OSOM movements, including, but not limited to, the site entrances along Sturt Highway and Keri Keri Road, and at the intersection of Sturt Highway and Keri Keri Road.



The upgrades are required to ensure sufficient space for oversized vehicle passage, and may include intersection, widening trimming and removal of vegetation, removable signs and infrastructure, and the relocation of overhead wires.

### 3.4.6 RESOURCE REQUIREMENTS

Construction materials including gravel, aggregate and sand will be required for the concrete batch plant and construction of hardstands to support Project infrastructure, including internal access tracks and installation of electrical cabling.

As a worst-case scenario, gravel, aggregate and sand can be sourced externally from existing operating quarries. Existing operating quarries in the Project locality (less than 200 km from site entries) and their material resources are shown in **Table 3-1**.

**TABLE 3-1 OPERATIONAL QUARRIES WITHIN THE PROJECT LOCALITY**

Facility	Location	Aggregate	Sand	Concrete	Road base
Mallee Quarries Pty Ltd	3367 Murray Valley Highway, Tol Tol VIC	✓			✓
Boral Quarries Irymple (Dareton)	549 Sandilong Avenue Irymple VIC	tbc	tbc	tbc	tbc

If needed from external sources, construction materials will be transported by trucks and stockpiled within the laydown areas and at the concrete batch plants. Construction equipment such as excavators, bulldozers, trenching machines and trucks will be sourced locally from the Riverina Murray region, subject to availability and cost. Steel used for concrete foundations will be sourced from within NSW, also subject to availability and cost.

Approximately 160.5 megalitres (ML) of water would be required during the construction phase, primarily for concrete (approximately 14 ML), road works and earthworks (approximately 100 ML), and dust suppression (approximately 40 ML). Water for road works and dust suppression can be of lower quality than is required for concrete production. Water will likely be sourced from landholder dams / bores within the Project Area.

Potable water will also be required for staff amenities during operation and will be collected in rainwater tanks installed at the O&M facility (refer **Section 2.3**).

### 3.4.7 POST-CONSTRUCTION SITE REHABILITATION

When construction is completed, all temporary plant and equipment will be removed, and disturbed areas will be re-covered with topsoil for natural recover. Adequate sediment, soil and erosion controls will be put in place during ground disturbing works and rehabilitation activities in accordance with the 'Managing Urban Stormwater: Soils and Construction - Volume 1' (The 'Blue Book') (Landcom, 2004).

Post-construction rehabilitation requirements and processes will be detailed in the Environmental Management Strategy (Rehabilitation Management Plan) to be prepared prior to commencement of construction of the Project and undertaken in accordance with relevant conditions of the Development Consent for the Project.



## 4. PROJECT OPERATION

Upon commissioning, the Project will be operational 24 hours per day, seven days per week. The Project will be monitored and controlled by a remote Supervisory Control and Data Acquisition (SCADA) from a control room located within the O&M facility. Where required, assistance from an offsite SCADA engineering team may be sought. The SCADA system is designed to maximise the power output, allow for remote control of the WTGs and monitor the efficiency of the power plant.

While the wind farm will be monitored remotely, the WTG and other equipment will require regular maintenance. Site maintenance will be undertaken by site staff on an ongoing basis with activities scheduled consistently throughout the year. Site maintenance will include maintenance of the WTGs, reticulation network, access roads, substations, and transmission lines.

Most repairs can be undertaken during routine maintenance; however, circumstances may arise where additional specialist technical maintenance staff are required (e.g., such as unplanned equipment failure). For some WTG components, maintenance or replacement may need to be undertaken using a crane.

Daily maintenance will occur during standard working hours. Outside of emergencies or major asset inspection or maintenance programs, night works or works on Sundays or public holidays will be minimal.

## 5. DECOMMISSIONING AND REHABILITATION

The WTGs have an expected operating life of up to 30 years, at the end of which there are three main options for consideration:

- Continue the use of the site as a wind farm using the existing WTGs (subject to condition of equipment);
  - Replace the WTGs with technology current at that time and continue the use of the site as a wind farm for a further term; or
  - Decommission the Project and remove the WTGs and ancillary infrastructure in accordance with the Environmental Management Strategy which will be prepared for the Project.
- When decommissioning occurs:
- Key stakeholders including landholders will be consulted;
  - All above ground structures not required for the ongoing agricultural use of the land, including the WTGs, transformer stations, and substation, will be removed and the land rehabilitated to ensure it can be returned to agricultural use;
  - Access tracks and hardstands not requested by the landowner to be retained will be removed and land rehabilitated and returned to agricultural use; and
  - Below ground infrastructure, including cabling and the WTG foundations, will be left in situ to avoid further disturbance and minimise clearing of revegetated areas. The infrastructure will be removed to a minimum of 0.5 m below the ground surface and where required will be covered in clean fill material and topsoil prior to revegetation. Rehabilitated areas will



be adequately graded to reflect the slope of the surrounding area and to mitigate the risk of soil erosion.

All materials removed from the Project Area will be sorted and packaged for reuse and/or recycled where possible in accordance with the waste hierarchy.

A Decommissioning and Rehabilitation Plan will be prepared for the Project no less than five years prior to decommissioning and / or in accordance with any project approval requirements. It is anticipated that the decommissioning and rehabilitation phase would take up to 18 months to complete, with the Project Area being returned, as far as practicable, to its condition prior to the commencement of construction.

The Applicant has entered long-term lease agreements with the associated landholders for the construction and operation of the Project. The terms of these agreements make express provision for the Applicant's decommissioning obligations. Until decommissioning is complete, lease fees are payable to the associated landholders.

## 6. FUTURE LAND SUBDIVISION

Transgrid requires freehold title to the switching station to proceed with the construction of the relevant electrical connections and infrastructure. The Project would require the future creation of title(s) in a subdivision of Lot 36 Deposited Plan (DP) 756546 to enable land ownership of the switching station assets to be transferred to Transgrid. Transgrid will obtain freehold title through either transfer, dedication or acquisition.

The Project may also require the creation of title(s) to enable land ownership of the substation assets within the following:

- Lot 36 and Lot 75 DP756546;
- Lot 84 DP756546; and
- Lot 12 DP756546.

## 7. COMMUNITY BENEFIT FUND

The Applicant intends to provide a Community Benefit Fund (CBF) from the commencement of construction, to support initiatives during the construction period and for the life of the Project, and will use best endeavours to meet emerging guidelines in relation to benefit sharing from the NSW Government.

The broad intention of the CBF is that funds would be allocated to support non-profit organisations, community programs / events, local businesses, training, and services / infrastructure. Acciona Energia will work with the local communities of the Project to identify opportunities for long term benefits. The CBF may be comprised of a Voluntary Planning Agreement (VPA) with Murray River Council, along with an annual small grants / scholarship program. For clarity, this contribution would be in addition to the Access Fee and the proportion of which goes to community benefit.



For this Project, financial compensation is reserved for the host landowners. No, non-associated neighbours will receive financial compensation as impacts do not warrant these. The Applicant will also prepare a Local Employment and Procurement Plan, outlining incentives for the contractor to set targets for local employment and use local goods and services. This will provide further benefits to the local economy.

## 8. REFERENCES

- Arriscar. (2024). *Preliminary Hazard Analysis of Keri Keri Wind Farm and BESS* . Retrieved December 2025, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240419T003037.765%20GMT>
- Aviation Projects. (2025). *Keri Keri Wind Farm – Aviation Impact Assessment Technical Memorandum* .
- Landcom. (2004). *Managing Urban Stormwater: Soils and construction - Volume 1*. Retrieved December 2025, from <https://www.environment.nsw.gov.au/sites/default/files/managing-urban-stormwater-soils-construction-volume-1-fourth-edition.pdf>
- NSW DECC. (2009). *Interim Construction Noise Guideline*. NSW Department of Environment & Climate Change. Retrieved 2025 December , from <https://www.epa.nsw.gov.au/sites/default/files/09265cng.pdf>



## APPENDIX B UPDATED MITIGATION AND MANAGEMENT MEASURES



**TABLE B1** UPDATED MITIGATION AND MANAGEMENT MEASURES

Environmental Aspect	Mitigation Measures	Where Addressed
Development	Construct, operate, maintain and decommission the Keri Keri Wind Farm generally in accordance with the 'Description of the Amendments'.	Section 318 and Appendix A of this report
	Seek relevant approvals and post-approvals in accordance with Section 4.1 to Section 4.5 of the EIS	Section 4 and Appendix C of this report
General	An Environmental Management Strategy (EMS) will be developed to guide proposed activities associated with the construction, operation and decommissioning and rehabilitation of the Project.	Section 7 of the EIS (ERM, 2024)
Biodiversity	<p>A range of avoidance and minimisation measures will be implemented for direct, indirect and prescribed impacts, as detailed in Table 8-6 of Appendix D and summarised below:</p> <ul style="list-style-type: none"> <li>• Delineation of clearing areas;</li> <li>• Erosion, sedimentation and pollution control;</li> <li>• Mammalian predator management;</li> <li>• Pre-clearance surveys; and</li> <li>• Weed, pest and pathogen management.</li> </ul> <p>Management plans recommended for the amended Project include:</p> <ul style="list-style-type: none"> <li>• Biodiversity Management Plan;</li> <li>• Construction Environmental Management Plan;</li> <li>• Construction Traffic Management Plan; and</li> <li>• Soil and Water Management Plan.</li> </ul>	Section 6.1.3 and Appendix D of this report
	A Bird and Bat Adaptive Management Plan will be developed in accordance with the Draft Wind Farm Assessment Guidance for the SW REZ, released by DPE in July 2023.	A draft is provided in Appendix A of Appendix D
	For residual impacts that cannot be avoided or fully mitigated, offsets will be required to ensure no net loss of biodiversity.	Table 6-3Table 6-3 and Table 6-4Table 6-4 of this report.

Environmental Aspect	Mitigation Measures	Where Addressed
Aboriginal Cultural Heritage	<p><u>Micro-siting</u>            Micro-siting of project elements will be implemented as the primary mitigation measure to avoid disturbing all recorded Aboriginal cultural heritage sites and any that may be found during construction or operation. Micro-siting should occur within the boundary of the area previously surveyed wherever possible. If micro-siting was to occur within any areas that have not been previously surveyed, additional precautions should be undertaken as directed by the ACHMP.</p>	Section 6.2 and Appendix H of the EIS (ERM, 2024)  Section 6.2.3 and Appendix E of this report
	<p><u>ACHMP</u>            The Applicant will develop an Aboriginal Cultural Heritage Management Plan (ACHMP) to be approved by the Planning Secretary. The ACHMP will be developed in consultation with Traditional Owners and Heritage NSW and will include procedures for the long-term management of artefacts and an Unexpected Finds Protocol.</p>	
	<p><u>Stock Management</u>            The Applicant will continue to liaise with the Project landowners and Traditional Owners to develop appropriate stock management strategies to limit further disturbance to Aboriginal cultural heritage sites</p>	
	<p><u>Traditional Owner Liaison</u></p> <ul style="list-style-type: none"> <li>• The Applicant will consider appointing and training a Traditional Owner Liaison to appropriately coordinate access for staff and contractors to culturally sensitive areas and provide cultural awareness training; and</li> <li>• The Applicant will consider working with the Traditional Owners to develop and implement additional research opportunities that would extend the understanding of the Aboriginal heritage values within the Project Area beyond the Disturbance Footprint and place them in context of the broader cultural landscape of the Plains region, and the internationally significant story of this area and its connection to the Willandra Lakes and Lake Mungo.</li> </ul>	
	<p><u>Transport Route</u>            The following mitigation measures are proposed to avoid impacts to Aboriginal cultural heritage at locations where road upgrades are required along the transport routes:</p> <ul style="list-style-type: none"> <li>• Cultural Awareness Induction: All personnel involved with construction activities that involve ground disturbance are to undertake a cultural awareness induction, which will include identification of potential Aboriginal cultural heritage objects, identification of historic heritage finds, and implementation of the Unexpected Finds Protocol; and</li> <li>• Unexpected Finds Protocol: If suspected Aboriginal or historic heritage objects or items are found, the Unexpected Finds Protocol provided in the ACHMP must be followed.</li> </ul>	

Environmental Aspect	Mitigation Measures	Where Addressed
Historic Heritage	<p>No specific measures to mitigate historic heritage are recommended for the amended Project. Due to the limited existing heritage features and archaeological potential, the likelihood of the amended Project impacting historic heritage is considered nil to low. A Chance Finds Procedure will be in place for any unexpected finds with potential historic heritage significance during construction and operation of the Project.</p>	<p>Section 6.3 and Appendix H of the EIS (ERM, 2024)</p> <p>Section 6.2.3 and Appendix E of this report</p>
Noise and Vibration	<p><u>Construction noise</u></p> <p>A Construction Noise and Vibration Management Plan (CNVMP) will be developed for management of the construction works. The CNVMP would have the following objectives:</p> <ul style="list-style-type: none"> <li>• Provide a management framework and mitigation measures to minimise noise and vibration impacts where possible;</li> <li>• Establish approved hours for works;</li> <li>• Ensure workers are aware of noise and vibration generating activities and any required control methods to minimise impacts;</li> <li>• Establish roles and responsibility for managing noise and vibration impacts; and</li> <li>• Establish a noise and vibration complaints management system.</li> <li>• The following measures will be adopted in terms of best practice during construction and should be implemented to reduce noise levels and minimise any impacts as far as practicable:               <ul style="list-style-type: none"> <li>• Avoid unnecessary noise due to idling diesel engines and fast engine speeds when lower speeds are sufficient;</li> <li>• Ensure all machines used on the site are in good condition, with particular emphasis on exhaust silencers, covers on engines and transmissions and squeaking or rattling components. Excessively noisy machines should be repaired or removed from the site; and</li> <li>• Ensure that all plant, equipment and vehicles movements are optimised in a forward direction to avoid triggering motion alarms that are typically required when these items are used in reverse; and</li> <li>• During the construction design, choose appropriate machines for each task and adopt efficient work practices to minimise the total construction period and the number of noise sources on the site.</li> <li>• Select the quietest item of plant available where options that suit the design permit.</li> </ul> </li> </ul>	<p>Section 6.4 and Appendix I of the EIS (ERM, 2024)</p> <p>Section 6.3.3 and Appendix G of this Amendment Report</p>



Environmental Aspect	Mitigation Measures	Where Addressed
	<p><u>Traffic noise</u></p> <ul style="list-style-type: none"> <li>• Construction road traffic and heavy vehicle movements will be limited during the night period and avoided if possible.</li> <li>• Care will be taken, particularly through towns and around site entry and exit points, to avoid excessive acceleration of trucks and the use of truck engine brakes in close proximity to dwellings and that such behaviour will be reinforced through worksite induction training.</li> <li>• Construction and operational traffic noise management will be included in the CNVMP for the Project.</li> </ul>	
Traffic and Transport	<p><u>Information and Communication</u> Prior to and during the construction period, implementation of a community information and awareness program would assist in managing traffic impacts. This program of consultation aims to ensure local residents are aware of construction traffic accessing the Project.</p> <p><u>OSOM Vehicles Enabling Works</u> OSOM vehicles would be governed by a Construction Traffic Management Plan which will include the measures outlined in Section 6.2 of Appendix I.</p> <p><u>Project Related Traffic Generation</u> Mitigation measures to reduce the potential volume of daily and peak hour traffic generated by construction activities include:</p> <ul style="list-style-type: none"> <li>• Provision of on-site worker accommodation and implementation of a typical 10 day on – 4 day off shift; and</li> <li>• Implementation of a shuttle bus service.</li> </ul> <p><u>Road Safety</u> The Safe Systems Approach as outlined in the National Road Safety Strategy 2021-30 will be adopted to prioritise harm prevention and reduction.</p> <p><u>Driver Code of Conduct</u> The Driver Code of Conduct is to be implemented as part of the Construction Traffic Management Plan and aims to minimise the impact of individual driver behaviours on all users of the public roads forming part of the site access routes.</p> <p><u>Dilapidation Survey</u> Ongoing monitoring, in consultation with TfNSW and local councils, for the proposed transport route will be carried out to assess for any damage to pavements, drainage and bridge structures. It is expected that any damage from construction traffic, except normal wear and tear, would be repaired.</p>	Section 6.4.3 and Appendix I of this report

Environmental Aspect	Mitigation Measures	Where Addressed
	<p><u>Road Authority Approvals for OSOM Vehicles</u> OSOM vehicles would require permits from the National Heavy Vehicle Regulator (NHVR). This replaces the approvals that were previously granted from TfNSW and councils. Applications are to be submitted to the NHVR.</p>	
Landscape and Visual	<p><u>Project Layout and Design – Wind Farm Layout and Size</u> The following principles have been and will continue to be considered in the design process of the Project (as applicable):</p> <ul style="list-style-type: none"> <li>• The lines of WTGs will reflect the contours of the natural landscape as best as possible;</li> <li>• Where possible, the location of turbine types, densities, and layout geometry will be considered to minimise the visual impacts; and</li> <li>• Where possible, turbines will be evenly spaced to give a regular pattern creating a better balance within the landscape.</li> </ul>	Section 6.6 and Appendix K of the EIS (ERM, 2024)  Section 6.5.3 and Appendix F of this report
	<p><u>Project Layout and Design – Wind Turbine Design and Colouring</u> The turbines will have a matte white finish and consist of three blades. The following factors will also be considered in the Project design to achieve a visual consistency through the landscape:</p> <ul style="list-style-type: none"> <li>• Uniformity in the colour, design, height, and rotor diameter;</li> <li>• The use of simple muted colours and non-reflective materials to reduce distant visibility and avoid drawing the eye;</li> </ul>	
	<p><u>Screen Planting</u></p> <ul style="list-style-type: none"> <li>• In circumstances where residences are subject to a high level of visual impact, screen planting will assist in mitigating views of turbines from residential properties.</li> <li>• If accepted by the landowner, screen planting is recommended for dwellings 19 and 99.</li> </ul>	
	<p><u>Residence Supplementary Planting</u> When planning for landscaping and visual screening the following will be adhered to by the Project:</p> <ul style="list-style-type: none"> <li>• Planting will occur post construction, where possible;</li> <li>• Planting will remain in keeping with existing landscape character;</li> <li>• Species selection will be typical of the area;</li> <li>• Planting layout will avoid screening views of the broader landscape, where possible;</li> <li>• Clearing of existing vegetation will be avoided;</li> <li>• Where appropriate, any lost vegetation will be reinstated; and</li> <li>• Where possible, over any areas of disturbance, natural vegetation will be allowed to regrow.</li> </ul>	

Environmental Aspect	Mitigation Measures	Where Addressed
	<p><u>Night Lighting</u> To assist in the amelioration of the effect of night lighting and aviation hazards lighting the following will be applied:</p> <ul style="list-style-type: none"> <li>• Candela intensity will be the lowest as allowed by CASA;</li> <li>• Shielding will be provided (as per CASA requirements and if needed) and ensure that no more than 5% of the nominal light intensity is emitted at or below 5° below horizontal;</li> <li>• No light will be emitted at or below 10° below horizontal;</li> <li>• Security lighting throughout the wind farm, switching station and the substation will be minimised to decrease the contrast between the wind farm and the night-time landscape of the area;</li> <li>• Motion detectors will be used to activate night-time security lighting when required;</li> <li>• Lighting will be designed to ensure it does not spill onto nearby roads or residences;</li> <li>• Lighting at permanent infrastructure compounds will be in accordance with 'Australian Standard 4282: Control of Obtrusive Effects of Outdoor Lighting' (Standards Australia, 2023) and the 'National Light Pollution Guidelines for Wildlife' (DCCEEW, 2023); and</li> <li>• If obstacle lighting is installed, shielding will be used to prevent light spill.</li> </ul>	
	<p><u>Ancillary Infrastructure – Transmission Lines</u> During detailed design of overhead transmission lines the following will be considered:</p> <ul style="list-style-type: none"> <li>• Where possible, utilize existing transmission lines;</li> <li>• The route for overhead transmission lines will be selected with the aim to reduce visibility from surrounding areas and minimise vegetation loss;</li> <li>• Where possible, non-reflective materials for overhead electrical cabling will be used;</li> <li>• Visual identification elements will be non-reflective to avoid visual interference; and</li> <li>• Subtle colours and a low reflectivity surface treatment on power poles will be used to ensure that glint is minimised.</li> </ul>	
	<p><u>Ancillary Infrastructure – Access Roads</u></p> <ul style="list-style-type: none"> <li>• To reduce the residual visual impact resulting from the construction of access roads the following will be adopted by the Project:</li> <li>• Where possible, existing roads, trails or tracks will be utilised or upgraded to reduce the need for new roads;</li> <li>• Where possible, following construction roads will be downsized or restored to existing condition;</li> <li>• Cut and fill will be minimised in the construction of new roads and loss of vegetation will be avoided; and</li> <li>• Local materials will be utilised where possible and practical.</li> </ul>	



Environmental Aspect	Mitigation Measures	Where Addressed
	<p><u>Ancillary Infrastructure – Ancillary Structures</u></p> <ul style="list-style-type: none"> <li>To reduce any residual visual impacts from temporary infrastructures the following measures will be considered:</li> <li>Siting of infrastructure will minimise vegetation loss;</li> <li>Buildings will be sympathetic to existing architectural elements in the landscape;</li> <li>Building materials will use type and colours that blends into the existing landscape;</li> <li>Unnecessary lighting, signage on fences, logos etc. will be avoided;</li> <li>Cut and fill and loss of existing vegetation will be minimised throughout the construction process; and</li> <li>Boundary screen planting will be considered to ameliorate potential visual impacts resulting from the construction of ancillary structures with a small vertical scale such as collector substations, switching stations and the operations facilities building.</li> </ul>	
Aviation	<p><u>Obstacle Lighting</u> A lighting plan will be prepared prior to construction of the Project, in accordance with NASF Guideline D and in consultation with CASA, NPWS, Project landowners and neighbours. As necessary, obstacle lighting installed will be a minimum 200 candela intensity.</p> <p><u>Designed air routes</u> To accommodate the highest WTGs:</p> <ul style="list-style-type: none"> <li>The two nearest 1,800 ft Grid LSALTs will need to be raised to 2,200 ft AMSL; and</li> <li>Air Route W762 LSALT will need to be raised by 100 ft to 2,200 ft AMSL and Air Route H247 LSALT will need to be raised by 200 ft to 2,200 ft AMSL.</li> </ul> <p>The Applicant will engage with Airservices Australia prior to construction regarding the changes for both Grid LSALTs and Air Route LSALTs.</p> <p><u>Notification and reporting</u></p> <ul style="list-style-type: none"> <li>'As constructed' details of WGT and WMT exceeding 100 m AGL will be reported to CASA as soon as practicable after forming the intention to construct or erect the proposed object or structure.</li> <li>'As constructed' details of WGT and WMT coordinates and elevation will be provided to Airservices Australia.</li> <li>Any obstacles above 100 m AGL (including temporary construction equipment) will be reported to Airservices Australia NOTAM office until they are incorporated in published operational documents. With respect to crane operations during the construction of the Project, a notification to the NOTAM office may include, for example, the following details: <ul style="list-style-type: none"> <li>The planned operational timeframe and maximum height of the crane; and</li> <li>Either the general area within which the crane will operate and/or the planned route with timelines that crane operations will follow.</li> </ul> </li> </ul>	<p>Section 6.7.1 and Appendix L of the EIS (ERM, 2024)</p> <p>Section 6.6.3 and Appendix J of this Amendment Report</p>



Environmental Aspect	Mitigation Measures	Where Addressed
	<ul style="list-style-type: none"> <li>• Details of the wind farm will be provided to local and regional aircraft operators prior to construction for them to consider the potential impact of the wind farm on their operation.</li> <li>• To facilitate the flight planning of aerial application operators, details of the Project, including the 'as constructed' location and height information of WTGs, WMTs and overhead transmission lines will be provided to landowners so that, when asked for hazard information on their property, the landowner may provide the aerial application pilot with all relevant information.</li> </ul>	
	<p><u>Aerial operations</u></p> <ul style="list-style-type: none"> <li>• Whilst not a statutory requirement, the Applicant will consider engaging with any local aerial agricultural operators and aerial firefighting operators in developing procedures for such aircraft operations in the vicinity of the Project.</li> </ul>	
	<p><u>Marking of turbines</u></p> <p>The rotor blades, nacelle and the supporting mast of the WTGs will be painted white, typical of most WTGs operational in Australia.</p>	
	<p><u>Marking of WMTs</u></p> <ul style="list-style-type: none"> <li>• Consideration will be given to marking the temporary and permanent WMTs according to the requirements set out in MOS 139 Section 8.10 (as modified by the guidance in NASF Guideline D). Specifically:</li> <li>• Marker balls or high visibility flags or high visibility sleeves should be placed on the outside guy wires;</li> <li>• Paint markings should be applied in alternating contrasting bands of colour to at least the top 1/3 of the mast; and</li> <li>• Ensuring the guy wire ground attachment points have contrasting colours to the surrounding ground/vegetation.</li> </ul>	
	<p><u>Lighting of WMTs</u></p> <ul style="list-style-type: none"> <li>• Consideration will be given to lighting temporary WMTs installed prior to WTG installation and WMTs that are not near a WTG with medium intensity steady red obstacle lighting at the top of the WMT mast. Characteristics for medium-intensity obstacle lighting are contained in MOS 139.</li> </ul>	
	<p><u>Overhead transmission line</u></p> <ul style="list-style-type: none"> <li>• Overhead transmission lines and/or supporting poles that are located where they could adversely affect aerial application operations will be identified in consultation with local aerial application operators and marked in accordance with Part 139 MOS 2019 Chapter 8 Division 10 section 8.110 (7) and section 8.110 (8).</li> </ul>	

Environmental Aspect	Mitigation Measures	Where Addressed
Telecommunications and EMI	<p><u>Survey Marks</u></p> <ul style="list-style-type: none"> <li>Given the distance from the WTGs, impacts to the survey marks during construction can be avoided. However, if construction works cannot avoid survey marks, a registered surveyor will be engaged and consultation with the NSW Government will be undertaken.</li> <li>The BOM have requested some further assurances from the Applicant regarding operation of the wind farm, which do not strictly concern the currently proposed placement of WTGs. The Applicant is committed to further information sharing and collaboration with the BOM, as discussed in Section 6.7.2.5.</li> </ul> <p>Development of a reporting pathway between the Applicant and NPWS to prevent and manage any operational issues which arise due to Project operations on point-to-point links or mobile radio performance.</p> <ul style="list-style-type: none"> <li>The Project has been designed to implement prudent avoidance by incorporating significant setbacks (ranging from 2 to 9 km) between residential dwellings and Project components which will generate EMF, as further detailed in Section 6.7.3.</li> </ul>	<p>Section 6.7.2 and Appendix M of the EIS (ERM, 2024)</p> <p>Section 6.7.3 and Appendix K</p>
Bushfire	<ul style="list-style-type: none"> <li>APZs will be established at the respective location of work, at the appropriate time, prior to commencement of activities, and maintained for the life of that component. The APZs would be maintained to the standard of an IPA for the life of the development.</li> <li>A minimum 20 m APZ to be established on all sides of the substations, switching station, BESS and O&amp;M Buildings (noting that the current project designs currently provide up to 35m wide APZ around the BESS and substation)</li> </ul> <p><u>During construction:</u></p> <ul style="list-style-type: none"> <li>Water supplies for bushfire/fire protection are to be installed and made accessible at the commencement of construction;</li> <li>Adherence to restrictions on Total Fire Bans or days of high fire danger during operations;</li> <li>Suitable firefighting equipment (specific requirements to be confirmed in consultation with NSW RFS) will be present onsite;</li> <li>Emergency communications equipment to be carried where practicable;</li> </ul> <p>Further measures to support in bushfire management and response during construction will be outlined in the BEMOP.</p> <p><u>During operation:</u></p> <ul style="list-style-type: none"> <li>Implementation of a remote SCADA system that will allow remote operation of all WTGs with the ability to shut-down individual or all WTGs if required;</li> <li>Regular liaison with NSW RFS, CASA and the RAAF Aeronautical Information Service;</li> </ul>	<p>Section 6.7.4 and Appendix N of the EIS (ERM, 2024)</p>



Environmental Aspect	Mitigation Measures	Where Addressed
	<ul style="list-style-type: none"> <li>• Safe working and emergency response procedures for all work tasks to be developed and implemented.</li> <li>• Vegetation fuels throughout the windfarm are to be maintained in a minimal condition by grazing, or with additional slashing or mowing if required.</li> <li>• Further measures to support in bushfire management and response during operation will be outlined in the BEMOP.</li> </ul>	
Preliminary Hazard Analysis	<p>The Project has been designed in compliance with the relevant DPE Risk Criteria for Land Use Safety Planning and has incorporated prudent separation between containers and implemented suitable infrastructure to prevent or mitigate against failure (and the failure-associated risks) of the BESS. An Emergency Response Plan will be developed and provide guidance for emergency response personnel on appropriate safety precautions and response measures to be implemented from any hazards and escalating events.</p> <p>A range of mitigation and management measures for each of the identified hazards and events will be implemented as discussed in the PHA, including micro-siting of WTG 177.</p>	<p>Section 6.7.5 and Appendix O of the EIS (ERM, 2024)</p> <p>Section 6.10.3 and Appendix M of this report</p>
Blade Throw	<ul style="list-style-type: none"> <li>• International Electrotechnical Commission (IEC) Standards will be used for the design and construction of the Project, which will reinforce the confidence that blade throw will represent a very low risk.</li> <li>• Inspection and Testing Procedures will be initiated and audited during the construction and commissioning phase. Once testing finds all WTG components including the blades are passed, the WTG will be commissioned for operation.</li> <li>• A high quality, comprehensive and robust operations and maintenance program will be implemented to ensure that WTG faults are prevented or detected and rectified quickly, minimising the risk of occurrence of a serious or dangerous problem.</li> </ul>	<p>Section 6.7.6 and Appendix O of the EIS (ERM, 2024)</p> <p>Section 6.10.3 and Appendix M of this report</p>
Water	<ul style="list-style-type: none"> <li>• A Soil and Water Management Plan (SWMP) will be prepared prior to the commencement of construction and be accompanied by a Progressive Erosion and Sediment Control Plan (ESCP) to address specific high-risk areas identified during detailed design. The SWMP will be prepared in accordance with the Managing Urban Stormwater guidelines, particularly Volumes 2A and 2C.</li> <li>• The SWMP and ESCP will include mitigation measures outlined in Section 6.8.5.</li> <li>• Should additional groundwater bores or water from other sources covered under the relevant water sharing plan be required, the Applicant will seek to obtain a water access license (WAL), and other relevant approvals, subject to availability.</li> </ul>	<p>Section 6.8 and Appendix K of the EIS (ERM, 2024)</p> <p>Section 6.8.3 and Appendix H</p>



Environmental Aspect	Mitigation Measures	Where Addressed	
	<p><u>Flooding Management</u></p> <ul style="list-style-type: none"> <li>• Emergency flood management measures during construction and operation of the Project, including:               <ul style="list-style-type: none"> <li>○ Monitoring of the NSW Hazards Near Me app for extreme weather warnings that may result in flooding;</li> <li>○ Site evacuation and closure in the event of a local warning advising of the potential for flooding; and</li> </ul> </li> <li>• Site closure until floodwaters have receded entirely and safe access to the Project has been restored.</li> </ul>		
Land and Agriculture	<p><u>Structures</u></p> <p>Location of permanent and temporary structures will be strategically placed to avoid or minimise disturbance to grazing and land.</p>	Section 6.9 and Appendix L of the EIS (ERM, 2024)	
	<p><u>Disruption impacts</u></p> <ul style="list-style-type: none"> <li>• Landholders are to be consulted regarding required adjustments to any property infrastructure.</li> <li>• Property infrastructure is to be managed in accordance with landholder requirements.</li> <li>• Any damage to property infrastructure caused by construction must be replaced in a timely manner in consultation with the landowner.</li> <li>• Use of existing roads, tracks and other existing disturbed areas should be prioritised.</li> <li>• Vehicular or plant movement should be confined to one route to minimise disturbance to open spaces.</li> </ul>		Section 6.9.3 and Appendix L of this report
	<p><u>Fire risk</u></p> <ul style="list-style-type: none"> <li>• A bushfire management plan would be prepared prior to construction start for the management of bushfire risks during the construction and operation periods.</li> </ul>		
	<p><u>Rehabilitation</u></p> <ul style="list-style-type: none"> <li>• Disturbed areas should be stabilised and appropriately rehabilitated as soon as practicable following disturbance during construction.</li> </ul>		
	<p><u>Livestock Disturbance</u></p> <ul style="list-style-type: none"> <li>• Management of noise intensive industries during sensitive periods within the livestock reproduction cycle (in consultation with landholder).</li> <li>• Management of vehicle movements and other activities in the vicinity of livestock should be managed through landholder consultation.</li> <li>• Livestock should be moved away (in consultation with landholders).</li> </ul>		
	<p><u>Biosecurity</u></p> <ul style="list-style-type: none"> <li>• Implementation of biosecurity protocols for people visiting the Project Area.</li> <li>• Washing down of all vehicles prior to entering any agricultural areas and when moving between paddocks with known weed infestations.</li> <li>• Temporary fencing comprising of chain link fencing to be installed surrounding construction facilities.</li> </ul>		



Environmental Aspect	Mitigation Measures	Where Addressed
	<ul style="list-style-type: none"> <li>• Permanent security fencing to be installed around operational facilities including the BESS, O&amp;M facility and substations.</li> </ul> <p><u>Weed control</u></p> <ul style="list-style-type: none"> <li>• Where present weeds will be managed in consultation with the landowners.</li> <li>• Where present within the permanent development footprint, weeds will be managed in accordance with the Biosecurity Act 2015 and the Murray Regional Strategic Weed Management Plan 2017-2022.</li> </ul> <p><u>Operational access</u></p> <ul style="list-style-type: none"> <li>• Fencing and access arrangements, such as locked gates and requirements for opening and closing of gates, would be determined in consultation with landowners.</li> <li>• Any damage caused by maintenance activities should be repaired promptly.</li> </ul> <p><u>Decommissioning</u></p> <ul style="list-style-type: none"> <li>• The Project Area will be returned to its former state at Project end of life.</li> <li>• Removal of all above ground infrastructure, hardstand surfaces, access tracks and other bare areas will be rehabilitated to native pasture. This process may include the addition of topsoil, restored drainage, and restoration of vegetation.</li> <li>• Underground infrastructure (such as cables and footings) would be removed to a depth of 500 mm below ground surface but may otherwise remain.</li> <li>• Contaminated material or waste would be removed or managed in accordance with relevant guidance and landholder consultation.</li> <li>• Weed infestations would be managed during the decommissioning Projects.</li> </ul>	
Air Quality	<ul style="list-style-type: none"> <li>• The EMS and associated subplans (e.g. Construction and Operation Environmental Management Plans) will include consideration of the management and mitigation of offsite dust emissions and provide guidance on how those environmental management measures will be implemented.</li> <li>• Measures as described in Section 6.10.5 will be included in the EMS to reduce visible dust emissions and will be implemented where appropriate, mostly to the construction phase of the Project.</li> </ul>	Section 6.10 of the EIS (ERM, 2024)
Waste Management	<ul style="list-style-type: none"> <li>• A Waste Management Plan (WMP) will be prepared prior to construction of the Project, describing best practice measures to be implemented to manage, reuse, recycle and safely dispose of waste.</li> <li>• Targeted management strategies for each waste type to be implemented will be undertaken</li> </ul>	Section 6.11 of the EIS (ERM, 2024)



Environmental Aspect	Mitigation Measures	Where Addressed
Socio-economic	<ul style="list-style-type: none"> <li>• Implement a Community Benefit Fund prior to construction</li> <li>• Develop and implement a Local Employment Plan and Local Content Plan prior to construction to maximise local employment, and regional business opportunities.</li> <li>• Develop and implement a Workforce Accommodation Management Plan prior to construction that manages and monitor impacts to local short and long-term accommodation availability and cost inflation attributable to Project workforce accommodation arrangements in surrounding towns.</li> <li>• Implement lease payments to host landowners that provide an alternative drought proof income with potential flow-on benefits to the regional economy</li> <li>• Promote continued agricultural activities during the operational phase of the Project and reinstatement of full pre-project agricultural production following project decommissioning</li> <li>• The SIA provides a monitoring framework for the social impact management measures during construction and operation phases of the Project. The monitoring framework will be integrated with the broader EMS to be developed for the Project.</li> </ul>	<p>Sections 6.12 and 6.13 and Appendix R and Appendix N of the EIS (ERM, 2024)</p> <p>Section 6.11.3 and Appendix N of this report</p>
Contamination	<p>An Unexpected Finds Procedure should be developed as part of the Construction Environmental Management Plan (CEMP) and implemented during construction of the project. The Unexpected Finds Procedure should include requirements for cessation of works within the affected area(s) until after the following has occurred:</p> <ul style="list-style-type: none"> <li>• Inspection of the suspected contamination by a qualified contaminated land specialist;</li> <li>• Collection of samples for analysis based on observations (soil, groundwater, surface water, etc.), followed by laboratory analysis;</li> <li>• Assessment of laboratory analytical results against applicable land use or waste classification criteria in accordance with applicable statutory guidelines; and</li> <li>• Management of the contamination in accordance with applicable statutory guidelines.</li> </ul>	<p>Section 6.12.3 and Appendix O of this report</p>



APPENDIX C

UPDATED STATUTORY COMPLIANCE  
TABLE



TABLE C1 SATUTORY COMPLIANCE FOR THE AMENDED PROJECT

Relevant Statute	Section Addressed	Amended Project Compliance
<b>Commonwealth Legislation</b>		
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	<ul style="list-style-type: none"> <li>Section 4.3 of the EIS (ERM, 2024)</li> <li>Section 6.1 and Appendix D of this report</li> </ul>	✓
<i>Native Title Act 1993</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> <li>Section 6.2 and Appendix E of this report</li> </ul>	✓
<i>Civil Aviation Regulations 1988</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> <li>Section 6.6 and Appendix J of this report</li> </ul>	✓
<i>Radio Communications Act 1992</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> <li>Section 6.7 and Appendix K of this report</li> </ul>	✓
<b>NSW Legislation</b>		
<i>Environmental Planning and Assessment Act 1979</i>	<ul style="list-style-type: none"> <li>Section 4 of the EIS (ERM, 2024)</li> <li>Section 4 of this report</li> </ul>	✓
<i>Protection of the Environment Operations Act 1997</i>	<ul style="list-style-type: none"> <li>Sections 3.3.7.3 and 4 of the EIS (ERM, 2024)</li> </ul>	✓
<i>Biodiversity Conservation Act 2016</i>	<ul style="list-style-type: none"> <li>Section 4.3 of the EIS (ERM, 2024)</li> <li>Section 6.1 and Appendix D of this report</li> </ul>	✓
<i>Roads Act 1993</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> <li>Section 6.4 and Appendix I of this report</li> </ul>	✓
<i>Water Management Act 2000</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> <li>Section 6.8 and Appendix H of this report</li> </ul>	✓
<i>Conveyancing Act 1919</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> </ul>	✓
<i>Local Government Act 1993</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> </ul>	✓
<i>Crown Land Management Act 2016</i>	<ul style="list-style-type: none"> <li>Sections 3.2.2 and 4.4 of the EIS (ERM, 2024)</li> </ul>	✓
<i>National Parks and Wildlife Act 1974</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> </ul>	✓



Relevant Statute	Section Addressed	Amended Project Compliance
	<ul style="list-style-type: none"> <li>Section 6.2 and Appendix E of this report</li> </ul>	
<i>Heritage Act 1977</i>	<ul style="list-style-type: none"> <li>Sections 4.4 and 6.3 of the EIS (ERM, 2024)</li> </ul>	✓
<i>Rural Fires Act 1997</i>	<ul style="list-style-type: none"> <li>Sections 4.4 and 6.74 and Appendix N of the EIS (ERM, 2024)</li> </ul>	✓
<i>Fisheries Management Act 1994</i>	<ul style="list-style-type: none"> <li>Section 4.4 of the EIS (ERM, 2024)</li> <li>Sections 6.1 and 6.8, Appendix D and Appendix H of this report</li> </ul>	✓
NSW Planning Policies		
<i>State Environmental Planning Policy (Planning Systems) 2021</i>	<ul style="list-style-type: none"> <li>Sections 4.1, 4.5 and 4.5.1 of the EIS (ERM, 2024)</li> </ul>	✓
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	<ul style="list-style-type: none"> <li>Sections 4.1, 4.2 and 4.5 of the EIS (ERM, 2024)</li> </ul>	✓
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	<ul style="list-style-type: none"> <li>Section 4.5 of the EIS (ERM, 2024)</li> <li>Section 6.10 and Appendix M of this report</li> </ul>	✓
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>	<ul style="list-style-type: none"> <li>Section 4.5 of the EIS (ERM, 2024)</li> <li>Section 6.1 and Appendix M of this report</li> </ul>	✓
<i>State Environmental Planning Policy (Primary Production) 2021</i>	<ul style="list-style-type: none"> <li>Section 4.5 of the EIS (ERM, 2024)</li> <li>Section 6.9 and Appendix M of this report</li> </ul>	✓
<i>Wakool Local Environmental Plan 2013</i>	<ul style="list-style-type: none"> <li>Sections 4.5 and 4.51 of the EIS (ERM, 2024)</li> </ul>	✓



APPENDIX D

AMENDED BIODIVERSITY DEVELOPMENT  
ASSESSMENT REPORT



APPENDIX E

AMENDED ABORIGINAL CULTURAL  
HERITAGE ASSESSMENT REPORT



APPENDIX F

ADDENDUM LANDSCAPE AND VISUAL  
IMPACT ASSESSMENT



APPENDIX G

AMENDED NOISE AND VIBRATION  
IMPACT ASSESSMENT



APPENDIX H

ADDENDUM TO THE FLOOD IMPACT  
ASSESSMENT



APPENDIX I

AMENDED TRAFFIC AND TRANSPORT  
IMPACT ASSESSMENT



APPENDIX J

AMENDED AVIATION IMPACT  
ASSESSMENT



APPENDIX K

AMENDED TELECOMMUNICATIONS AND  
EMI ASSESSMENT



APPENDIX L

AMENDED AGRICULTURAL IMPACT  
ASSESSMENT



APPENDIX M

Response to DPHI on Keri Keri PHA RFI  
(J-000887-TN-01-Rev B)



APPENDIX N

UPDATED ECONOMIC ASSESSMENT



APPENDIX O

PRELIMINARY SITE INVESTIGATION



APPENDIX P

TRANSPORT ROUTE - ABORIGINAL  
CULTURAL HERITAGE DUE DILIGENCE



APPENDIX Q

COMMENT ON CONNECTION OPTIONS



APPENDIX R

VOLUNTARY PLANNING AGREEMENT  
LETTER



# ERM

ERM HAS OVER 160 OFFICES ACROSS THE FOLLOWING COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	The Netherlands
Australia	New Zealand
Belgium	Peru
Brazil	Poland
Canada	Portugal
China	Romania
Colombia	Senegal
France	Singapore
Germany	South Africa
Ghana	South Korea
Guyana	Spain
Hong Kong	Switzerland
India	Taiwan
Indonesia	Tanzania
Ireland	Thailand
Italy	UAE
Japan	UK
Kazakhstan	US
Kenya	Vietnam
Malaysia	
Mexico	
Mozambique	

**Environmental Resources  
Management Australia Pty  
Ltd**

Level 14, 207 Kent Street  
Sydney NSW 2000

**[www.erm.com](http://www.erm.com)**