



Keri Keri Wind Farm

Submissions Report

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SIGNATURE PAGE

Keri Keri Wind Farm

Submissions Report

0617753

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AAR	Aboriginal Ancestral Remains
ACHAR	Aboriginal Cultural Heritage Assessment Report
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
CEMP	Construction Environmental Management Plan
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPHI	Department of Planning, Housing and Infrastructure
DPE	Department of Planning
DPI	Department of Primary Industries
EIS	Environmental Impact Statement
ERM	Environmental Resources Management
ESOO	Electricity Statement of Opportunities
EPA	Environmental Protection Agency
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 Employee
GW	Gigawatt
GWh	Giga-watt hours
ICNG	Interim Construction Noise Guideline 2009
kV	Kilovolt
LGA	Local Government Area
LVIA	Landscape and Visual Impact Assessment

Acronym	Description
MRC	Murray River Council
MEG	Mining, Exploration and Geoscience
NEM	National Electricity Market
NSW	New South Wales
NPI	Noise Policy for Industry
NPWS	NSW National Parks and Wildlife Services
NVIA	Noise and Vibration Impact Assessment
OSOM	Oversize Overmass
PCT	Plant Community Type
PNTL	Project noise trigger levels
RAP	Registered Aboriginal Parties
REZ	Renewable Energy Zone
RFS	Rural Fire Services
SAII	Serious and irreversible impact
SCA	State Conservation Area
SSD	State Significant Development
SOS	Save our Surroundings
TfNSW	Transport for New South Wales
UNFCC	United Nations Framework Convention on Climate Change Conference
VIS	Vegetation Integrity Scores
WTGs	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 from 24 May 2024 to 20 June 2024. During exhibition, 53 submissions relating to the Project were received from government agencies, local council, organisations and members of the public.

Submissions, along with environmental and social constraints and constructability considerations have resulted in the Project being amended to that which was presented in the EIS. The details of the amended Project are presented in a separate Amendment Report (ERM, 2025). The amended Project has significantly reduced the potential for impacts to environmental and social aspects.

After removing duplicate submissions, the Applicant has considered 49 submissions in this Submissions Report. These include advice provided from government agencies and authorities (14 submissions) and Murray River Council (1), submissions from special interest groups (3) and the public (31).

Most submissions (91%) objected to the Project; however, this is a common occurrence with wind farm developments, largely due to a concerted effort by special interest groups. Common themes of those who objected to the Project related to:

- Perceived impacts to agricultural land;
- The feasibility/reliability of renewable energy technology;
- Wind turbine degradation resulting in environmental contamination and health impacts; and
- Impacts to threatened species within and in proximity to the Project area.

Since exhibition of the EIS, the Applicant has continued to engage meaningfully and transparently with stakeholders. As mentioned above, the Applicant has also amended the Project design. This necessitated the update of technical assessments to consider the amended Project and, where necessary, relevant submissions.

Advice provided by government agencies and authorities required consideration in updated technical reports, particularly advice provided by:

- Biodiversity, Conservation and Sciences (now Conservation Programs, Heritage and Regulation) who requested further survey effort, updates to vegetation mapping, and further consideration of prescribed impacts among other requests;
- Transport for NSW requested strategic designs for upgrades required along the transport route, and further consideration of vehicle volumes, turn warrants, and safety among other requests; and

- Heritage NSW who requested additional information on consultation undertaken, the nature of identified sites, survey effort and avoidance/minimisation among other requests.

Response to public and special interest group submissions covered topics relating to:

- The Project:
 - Location
 - Decommissioning and rehabilitation;
- Justification and evaluation;
- Procedural matters; and
- Economic, environmental and social impacts – biodiversity, noise, visual, social and economic, traffic, soils and agriculture, water resources, air quality and greenhouse gas emissions, hazards and cumulative impacts.

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, including.

- 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 CO₂^e per annum;
- Contributing to NSW and Australian Government emissions reduction targets;
- Strategically located in the South West REZ (Figure 1-1), and aligning 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, and accessibility;
- Project Layout amendments that have further avoid and minimise environmental and social impacts and maximised 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;
- 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
- Minimisation of potential impacts and appropriate management and/or offset of residual impacts in accordance with relevant policies.

1. INTRODUCTION

This section introduces the Project, including the current layout and Project elements to provide context for the responses to submissions. It also includes an overview of the assessments carried out since EIS exhibition as part of the Applicant's due diligence or in response to issues raised in submissions.

1.1 BACKGROUND

Acciona Energia Australia Global Pty Ltd. ('Acciona' or the 'Applicant') proposes to construct, operate, maintain and decommission the Keri Keri Wind Farm (the 'Project'), within the rural locality of Keri Keri, New South Wales (NSW).

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) (EPBC Ref: 2022/9176).

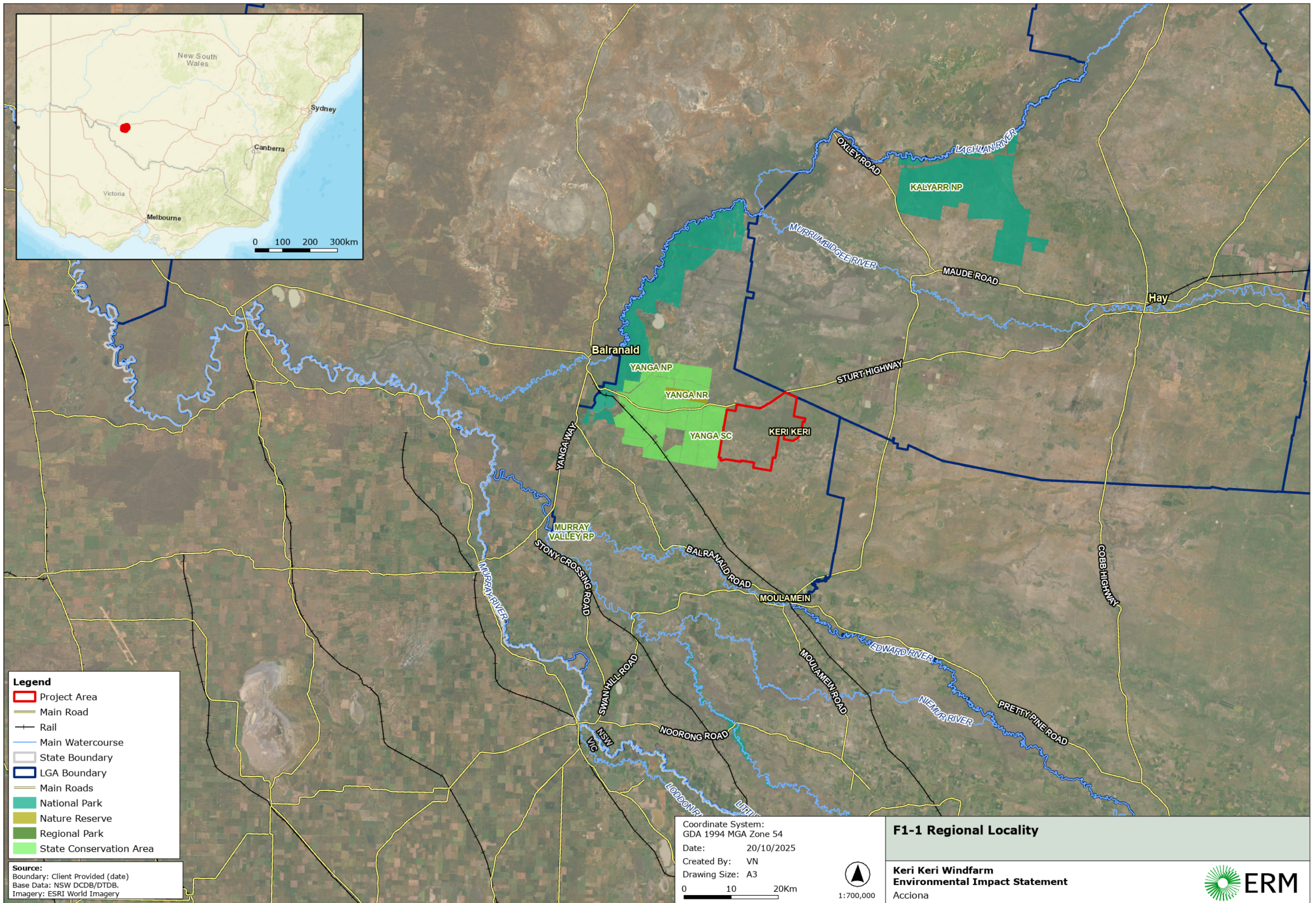
In support of the SSD application (SSD- 38358962), an EIS was prepared for the Project (ERM, 2024). The EIS was publicly exhibited between 24 May 2024 and 20 June 2024 by the NSW Department of Planning, Housing and Infrastructure (DPHI).

During exhibition, 53 submissions relating to the Project EIS were received from government agencies, local council, organisations and members of the public. The submissions are available on the DPHI Major Projects website [Keri Keri Wind Farm | Major Project Planning Portal](#) and are summarised in Appendix A.

This Submissions Report has been prepared to respond to the matters raised in the submissions and has been prepared in accordance with the *State Significant Development Guidelines – Preparing a Submissions Report, Appendix C* to the *State Significant Development Guidelines* (DPE, 2024).

This Submissions Report provides details of actions which have been taken since the EIS was exhibited, including a summary of Project amendments and ongoing community and Government stakeholder engagement. This Submissions Report should be read in conjunction with the Keri Keri Wind Farm EIS and supporting documentation ([Keri Keri Wind Farm](#)), and the Amendment Report (ERM, 2025).

The Minister for Planning is the consent authority for SSD, and SSD applications are assessed by DPHI. Following receipt of this Submission Report, DPHI will complete its assessment of the Project, prepare an assessment report and make a recommendation, taking into consideration the EIS, Submissions Report, Amendment Report and supporting documentation as well as submissions made during the public exhibition period.



1.2 PROJECT OVERVIEW

The Project is located about 30 kilometres (km) southeast of Balranald, and 75 km southwest of Hay in the Murray River Local Government Area (LGA) (refer Figure 1-1). The Project is within the South West Renewable Energy Zone (REZ) and is directly south of the Sturt Highway on land that is predominantly used for sheep grazing and cropping. The Project extends over an area of approximately 18,006 hectares (ha) across 66 freehold land parcels (Project area). It is anticipated that up to 764 ha of this land will be subject to construction and operation of the Project (Disturbance Footprint).

Following exhibition of the EIS, the Project layout has been refined in response to:

- The submissions received;
- Further assessment of environmental, economic and social aspects;
- Constructability requirements; and
- Consideration of the outcomes of agency, landowner, and community consultations.

Changes to the Project layout have generally been confined to the extent of the Disturbance Footprint and micro-siting corridor that was assessed within the EIS. However, some infrastructure has moved outside of the micro-siting corridor presented in the EIS. Where this has occurred, additional survey has been undertaken as necessary.

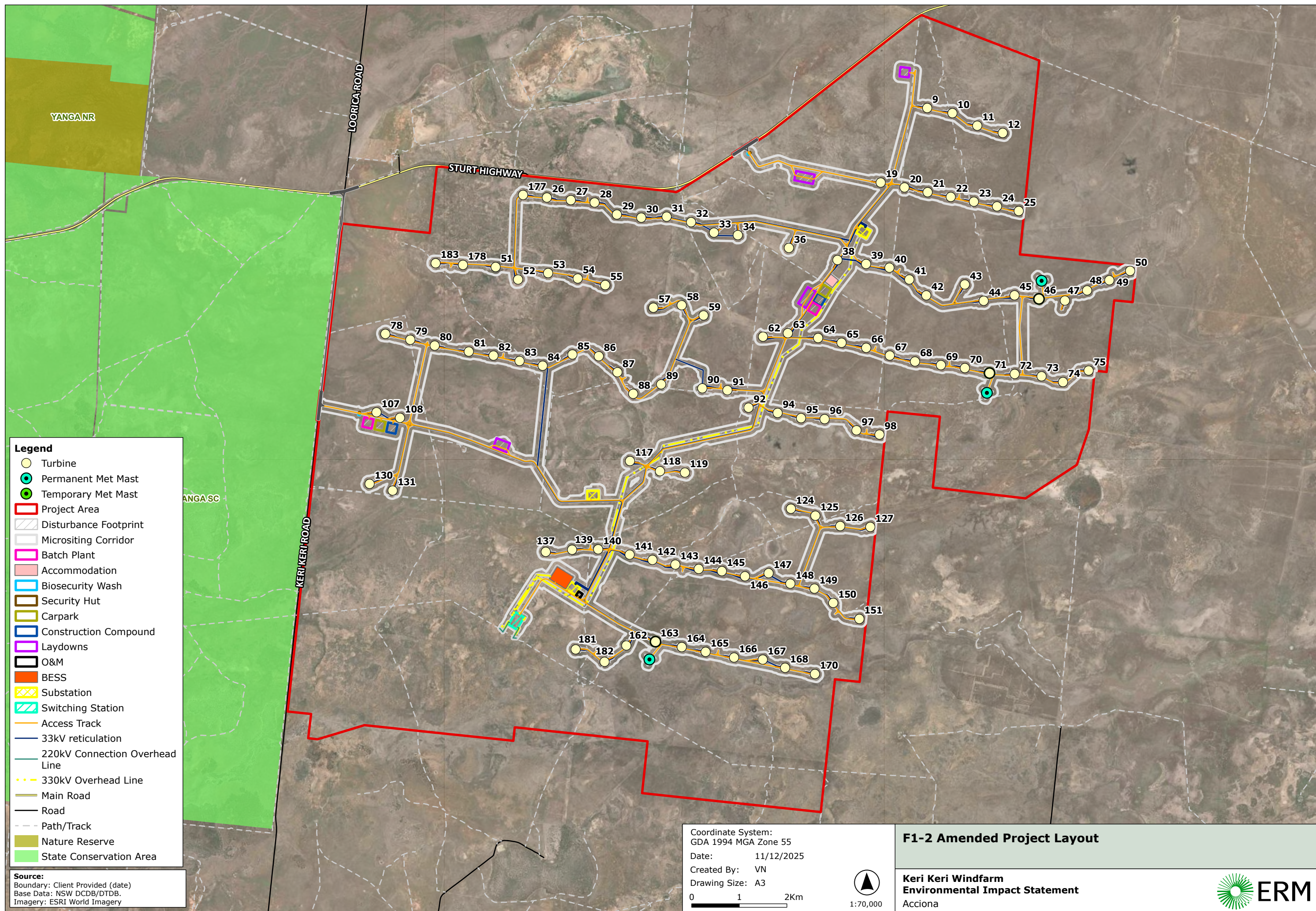
The amended Project layout is shown in Figure 1-2, and includes the Project elements as outlined in Table 1-1.

TABLE 1-1 OVERVIEW OF KEY PROJECT COMPONENTS

Project Component	Description	Amended Project
Project Footprint		
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.
WTGs		
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.	
Ancillary Infrastructure		
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
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

Project Component	Description	Amended Project
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 aides	1, reduced by 2
Security hut	20 m x 20 m at site access point	2, reduced by 2
Biosecurity wash bays	30 m x 30 m +15 m batters on all sides, at all site access point	At each site access point (2), reduced by 2 due to reduction in site access
New internal access tracks and drainage	Approximately 10 - 13 m wide including 4.0 to 8.5 m roadway plus shoulders and drainage as required.	116.5 km, reduced by 31.8 km
Site access	Site access off Keri Keri Road and Sturt Highway.	Reduction to 2 site access points
Transport route	Upgrades will be required at several locations along the route.	Port of Newcastle removed as an option, which has 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

Project Component	Description	Amended Project
Temporary Facilities		
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	- North: 400 m x 200 m +15 m batters; - Central: 400 m x 200 m +15 m batters; - West: 300 m x 200 m +15 m batters; and - East: 300 m x 200 m +15 m batters	4, increased 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 for temporary facilities	Minimum 20 m per meteorological mast Minimum 20 m all sides of buildings	No change



2. ANALYSIS OF SUBMISSIONS

This section provides an analysis of the submissions received for the Project EIS during its exhibition, with focus on groups and people, geographic extent, categorisation of issues and theme raised in the submissions.

2.1 NUMBER OF SUBMISSIONS

A total of 53 submissions relating to the Project EIS were received from government agencies, special interest groups and members of the public during. On review, some submissions were excluded from the analysis. Specifically;

- Duplicate submissions from a special interest group (SE-72241956 & SE-71231462)¹; and
- Triplicate submissions from the Civil Aviation Safety Authority (SE-72237971 & SE-71897957).

Submissions from the Civil Aviation Safety Authority (CASA) were reviewed and it was determined that their agency advice covered all issues raised in their 3 submissions.

There were two submissions from Murray River Council (MRC), counted as a single submission.

Therefore, 49 submissions relevant to the Project were analysed in this report, including:

- 14 government agency submissions;
- 1 local council submission (including 1 supplementary submission from MRC);
- 31 public submissions; and
- 3 submissions from special interest groups.

Of the submissions received from the public, council and special interest groups, 3 (9%) were in support of the Project and 32 (91%) were in objection to the Project (refer Figure 2-1).

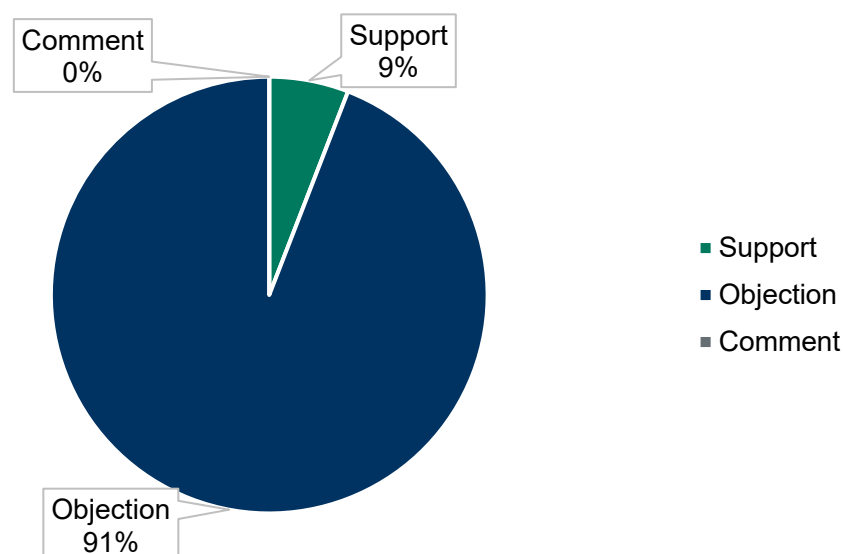


FIGURE 2-1 PUBLIC AND SPECIAL INTEREST GROUP SUBMISSION CATEGORISATION

¹ SE-72241956 was classified as a duplicate submission as it was from the same submitter as SE-72231462. All points were considered as a single submission (SE-72231462).

All submissions received have been recorded in the Submissions Register (refer Appendix A). A breakdown of the submissions by type (i.e., support, object, comment) is provided in Table 2-1 and includes comments from local council and government agencies.

TABLE 2-1 NUMBER OF SUBMISSIONS RECEIVED

Type	Object ²	Support	Comment ³	Total
Government Agency	-	-	14	14
Local Council	-	1	-	1
Public	30	1	-	31
Special Interest Groups	2	1	-	3
TOTAL	32	3	14	49

Submissions were received from the following government agencies and authorities:

- Biodiversity Conservation Science Directorate (BCS) and National Parks and Wildlife (NPWS);
- Transport for NSW (TfNSW);
- NSW Environmental Protection Authority (EPA);
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Heritage NSW;
- Department of Regional NSW – Mining, Exploration and Geoscience (MEG);
- Water NSW;
- NSW DCCEEW Water Group;
- DPHI Crown Lands;
- Department of Primary Industries (DPI) Agriculture;
- DPI Fisheries;
- Fire and Rescue NSW (FRNSW);
- NSW Rural Fire Service (RFS);
- Airservices Australia; and
- Civil Aviation Safety Authority (CASA).

One submission was received from a local council - Murray River Council - in support of the Project.

Three submissions were received from special interest groups, including from:

- Save our Surroundings (SOS);
- Xoss Trading Pty Ltd; and
- BG & JL Jarratt Pty Ltd.

² Note that one submission (one duplicate) has been discounted from the analysis of submissions.

³ Note that two submissions (two duplicates) have been discounted from the analysis and considered in agency submissions.

2.2 GEOGRAPHICAL ANALYSIS

The *State Significant Development Guidelines – Preparing a Submissions Report, Appendix C to the State Significant Development Guidelines* (DPE, 2024), specify that submissions should be geographically categorised according to the level of local (<5 km from the site), regional (5-100 km from the site) and broader community (>100 km from the site) interest in the Project.

Of the 34 unique public and special interest group submissions received:

- Zero were local (<5 km from the site);
- 15 (44%) were regional (5-100 km from the site), all of which were in objection; and
- 19 (56%) were categorised as broader community interest (>100 km from the site) comprising 2 in support and 17 in objection.

Figure 2-2 illustrates the breakdown of the geographic distribution of public and special interest groups submissions.

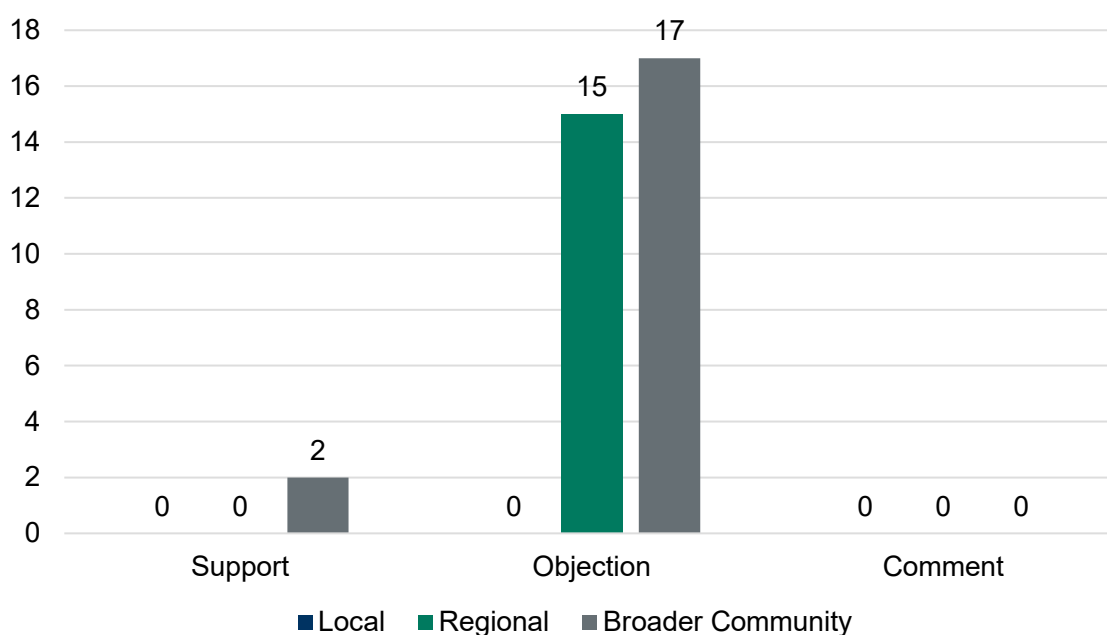


FIGURE 2-2 GEOGRAPHICAL ANALYSIS OF PUBLIC AND ORGANISATION SUBMISSIONS

All submissions in support of the Project were located within the broader community (>100 km from the Project). Submissions in objection to the Project were spread across the regional (5-100 km from the site) and broader community areas. Overall, 44% of the total submissions were received from LGAs that are located within 100 km of the Project.

2.3 SUBMISSION CATEGORISATION

Each submission received was reviewed and the key themes categorised according to the *State Significant Development Guidelines – Preparing a Submissions Report, Appendix C to the State Significant Development Guidelines* (DPE, 2024), as summarised below in Table 2-2. Note that each submission provided in support or objection to the Project may have raised more than one key theme.

TABLE 2-2 CATEGORISING ISSUES PER SSD GUIDELINES

Category	Description
The Project	The site, project area, physical layout and design, key uses and activities, timing
Procedural matters	The level or quality of engagement, compliance with the SEARs, identification of relevant statutory requirements
Economic, environmental and social impacts	Biodiversity, noise and vibration, landscape and visual, transport and traffic, social and economic, aviation, bushfire, BESS hazards, human health, heritage, agriculture, soil and water, flooding, air quality, waste and cumulative impacts
Justification and evaluation	Consistency of project with Government plans, policies or guidelines
Issues beyond scope of project	Broader policy issues or not relevant to the Project

Once submissions were allocated according to the categories in Table 2-2, they were then categorised into relevant sub-themes aligning with economic, environmental and social aspects.

A breakdown of the key matters raised in submissions in support and objection to the Project is provided in Section 2.3.1 and Section 2.3.2 respectively.

2.3.1 SUBMISSIONS IN SUPPORT

A summary of the key matters raised in public and special interest group submissions (collectively referred to as 'Public Submissions') in support of the Project is provided in Table 2-3.

TABLE 2-3 KEY MATTERS RAISED IN PUBLIC SUBMISSIONS (SUPPORT)

Category	Description
Justification and evaluation	Support the transition to renewable energy
	Local and regional growth and livelihood benefits related to income diversification, employment opportunities, economic benefits to businesses and ongoing agricultural practices
	Community objections and referral to the Independent Planning Commission for renewable Projects is causing unnecessary delays to renewable energy projects
Environmental, Social & Economic	The Project will have positive social impact by enabling local business jobs and community growth

Of the 2 (6%) public submissions received in support of the Project, the major support themes were:

- Long term benefit of the Project in supporting the transition to renewable energy; and
- Increased job and community growth opportunities because of the Project.

Figure 2-3 illustrates the broad themes raised in public submissions in support of the Project.

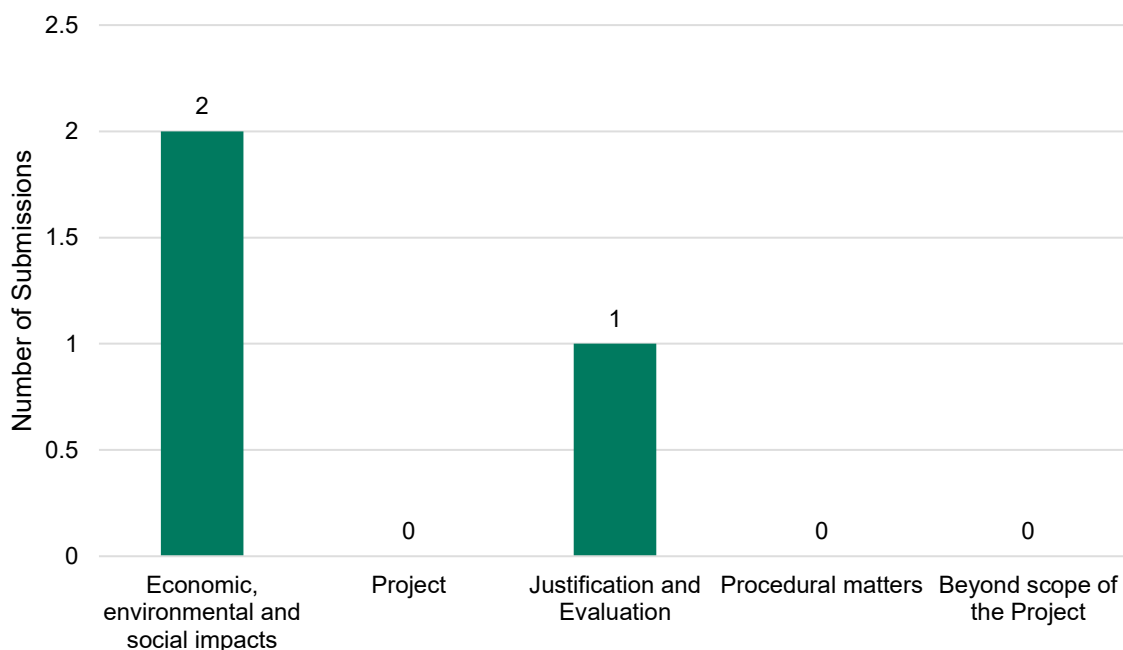


FIGURE 2-3 BROAD THEMES OF SUPPORT SUBMISSIONS

MRC was also in support of the Project; however, this submission is considered separately in Section 4.

2.3.2 SUBMISSIONS IN OBJECTION

A summary of key matters raised in public and organisation submissions in objection to the Project is provided in Table 2-4.

TABLE 2-4 KEY MATTERS RAISED IN PUBLIC SUBMISSIONS (OBJECTIONS)

Theme	Description
Project	Ill-suited location due to insufficient wind resources
	Use of large areas of agricultural land as a Project location will reduce the capability of the agricultural industry
Procedural Matters	Inconsistent information displayed between the Major Projects Exhibition website and Exhibition Notice
	Large scale wind energy projects impact the whole region despite not having wider community acceptance
	EIS assessments were rushed and insufficient to adequately characterise impacts
Justification and Evaluation	Renewable energy is not a sustainable solution as it does not provide baseload power
	Alternatives such as nuclear would be better suited to the development of alternative energy
	Consideration has not been provided to the supply chain issues (i.e., modern slavery) or the embedded emissions related to infrastructure production and transportation

Theme	Description
	Wind energy is unreliable, and the technology is outdated
	Wind energy projects threaten the future food security of Australia
	Large scale wind technology is not being used sufficiently in the National Electricity Market
Economic, Environmental and Social	As set out in Table 2-5

Of the public and special interest group submissions raised in objection to the Project, most opposed perceived environmental and social impacts, asserting the Project would:

- Result in impacts to the agricultural industry and productivity of the land;
- Cause irreversible damage to bird populations;
- Increase bushfire risk; and
- Cause widespread contamination across soil landscapes.

The main themes in objections raised are displayed in Figure 2-4 and related to:

- Concerns relating to wind turbine degradation resulting in widespread contamination of the surrounding area and associated health impacts;
- Concerns relating to the effectiveness of wind turbines and the role of wind energy in the National Electricity Market (NEM);
- Conflict with wind energy and agricultural land use; and
- Impacts to threatened species within and in proximity to the Project area.

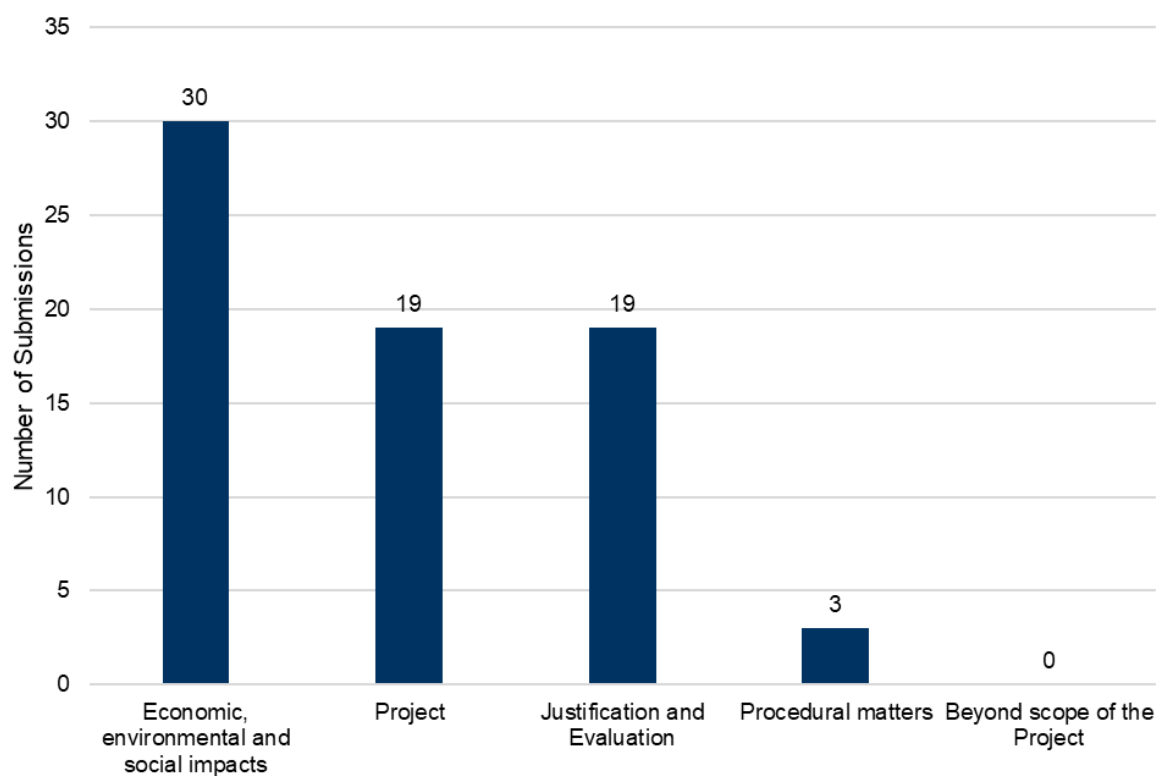


FIGURE 2-4 BROAD THEMES OF OBJECTION SUBMISSIONS

Key themes of objection to the Project relating to social, economic and environmental aspects are presented in Table 2-5.

TABLE 2-5 ECONOMIC, SOCIAL AND ENVIRONMENTAL SUBMISSIONS SUMMARY (OBJECTIONS)

Category	Description
Biodiversity	Cause impacts to habitats for threatened species
	May impact protected wetlands within the catchment area
	Large impacts to raptors or birds
Heritage	Farming landscape heritage will be lost through introduction of turbines
Noise	Health impacts to neighbouring properties from infrasound
	Generated noise will displace wildlife
Social and Economic	Causes impacts to community cohesion
	Adverse impact on non-associated surrounding landowners' property values is unacceptable
	Long term implementation costs will burden local community and strain capacity of local infrastructure
Traffic	Will require extensive clearing to accommodate access tracks

Category	Description
Visual	Wind turbines are ugly and can be seen for large distances in all directions
	Australian landscapes are having their natural character and beauty ruined
Soil and Agriculture	Will cause the land to be more erodible due to loss of topsoil and vegetation
	Decrease in agricultural productivity due to mixed use
	Agricultural land is finite and therefore should be preserved for future generations
	Contamination from wind turbine blades could impact local ecosystems
Water Resources, Hydrology and Flooding	Pollution from sedimentation and erosion of Project area
	Leaching of contaminants in local waterways
Preliminary Hazard Analysis	Exacerbates bushfire risk and toxic fumes could cause health issues
Bushfire	Turbine fires increase the chance of bushfire through additional ignition sources and fire throw risk
Health	Impacts to neighbours and hosts from impacts such as electromagnetic fields
	Unknown health risks associated with turbine blade shedding
Cumulative Impacts	Australia landscapes are having their natural character and beauty ruined
Waste	Wind turbine materials cannot be recycled
	Recycling of lithium batteries is not yet viable

Submissions in objection to the Project generally highlighted a range of issues associated with the operation and construction of the Project. The objections that were raised through submissions are addressed in Section 5.

A breakdown of the total submissions for each sub-category is illustrated in Figure 2-5.

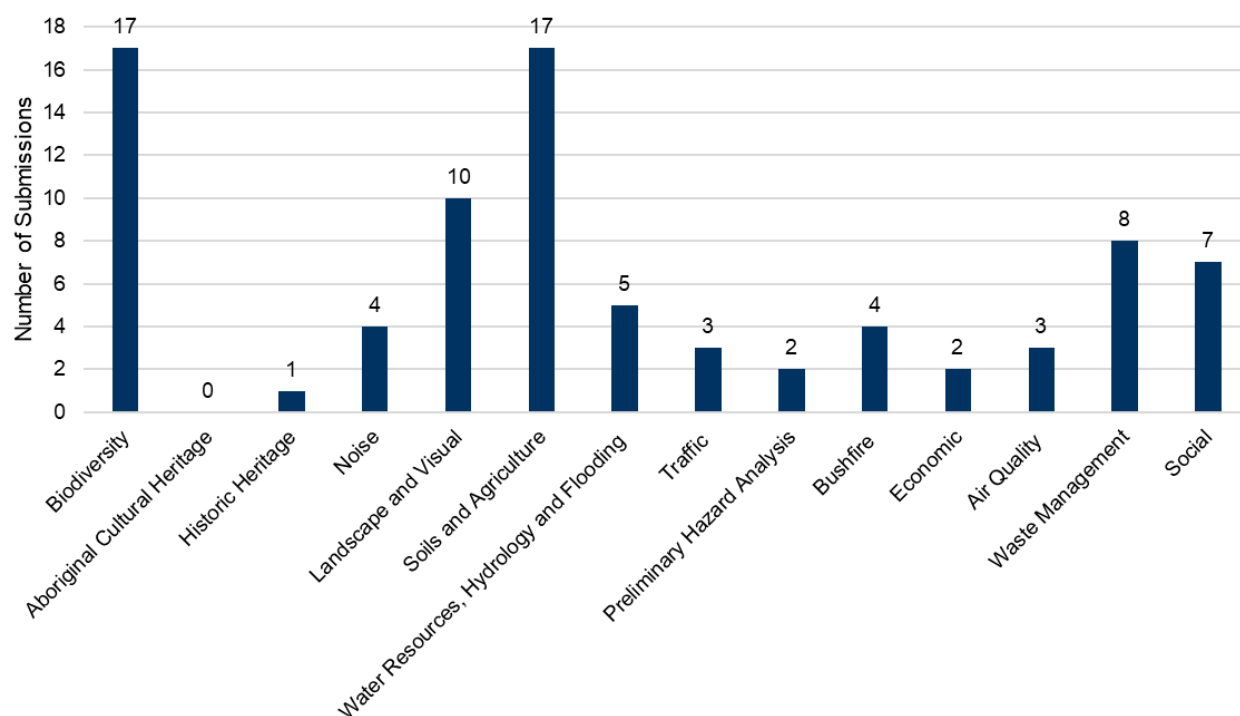


FIGURE 2-5 ECONOMIC, SOCIAL AND ENVIRONMENTAL ASPECTS OF OBJECT SUBMISSIONS

2.3.3 SUBMISSIONS THAT PROVIDED COMMENT ONLY

There were no submissions received from the public or special interest groups that commented on the Project.

3. ACTIONS TAKEN SINCE EXHIBITION

This section provides a summary of the actions undertaken to address the issues raised in submissions since the exhibition of the Project EIS.

3.1 ENGAGEMENT

3.1.1 REGULATOR ENGAGEMENT

The Applicant has consulted with several government agencies and MRC to clarify issues raised in submissions. Although none of the government agencies and/ or local council who provided a submission have objected to the Project, several have sought additional information or have recommended specific conditioning if approval is granted.

Table 3-1 summarises further engagement undertaken with government agencies and councils.

TABLE 3-1 REGULATOR ENGAGEMENT OVERVIEW

Engagement Activity	Description
DPHI	
20 August 2024	Discussed DPHI requirements and expectations regarding submissions from several agencies including Transport for NSW (TfNSW), Rural Fire Service (RFS), Biodiversity, Conservation and Science (BCS) and Civil Aviation Safety Authority (CASA), outline proposed refinements to the Project in response to submissions received, the need for an Amendment Report and Project submission timeline.
7 November 2024	Discussed progress with Response to Submissions, update proposed amendments to the Project and Project submission timeline.
9 October 2025	Discussed amended design, transmission connection, progress with Response to Submissions and Amendment Report.
BCS/CPHR	
21 August 2024	- 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. - BCS confirmed the proposed methodology, and approach will be accepted as consistent with the transitional arrangements when the reviewing the Updated BDAR.
28 August 2025	Discussed progress with responses to BCS submission, additional survey effort.
Heritage NSW	
6 September 2024	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.
Department of Regional Development	
17 July 2024	- Introduction to the Project and the Project Team - To discuss regional opportunities generated from the Project.

3.1.2 COMMUNITY AND STAKEHOLDER ENGAGEMENT

The Applicant has continued to engage with and seek feedback from the community and other stakeholders as detailed in Table 3-2 below.

TABLE 3-2 COMMUNITY AND STAKEHOLDER ENGAGEMENT OVERVIEW

Engagement Activity	Description
Landholder	
23 May 2024	Notification of Public Exhibition and link to information.
28 November 2024	Meeting in Echuca with landowner to brief on general Project updates and discuss status of Access Rights tender.
3 February 2025	Phone call with landowner to notify of unsuccessful Access Rights tender outcome.
Ongoing, monthly	Phone calls and emails with landowner to update on Project development status and ongoing network access options.
Nearby Communities, Community Groups and Business Groups	
May 2024	Advertisements in local publications and on social media to promote information sessions.
23 May 2024	- Notification of Public Exhibition and link to information. - Advertisement to promote information sessions. - General Project update. - Upcoming EIS information sessions. - Environmental Impact Statement. - Job and business opportunities.
24 May 2024	- Notification of Public Exhibition and link to information. - Pop-up sessions to promote EIS information sessions discussing: - General Project update. - Upcoming EIS information sessions. - Environmental Impact Statement. - Job and business opportunities.
30 May 2024	Information session to discuss the Environmental Impact Statement including emergency response and any other general interest.
31 May 2024	- Discuss opportunities to support local organisations and activities. - Concerns about housing. - Discussion around not wanting assets removed. - No concerns about the Project but interested in timelines and fire management.
5 June 2024	- Discussion about positive reception to advertisement of the sessions. - Information on the Project including decommissioning, transport route, impacts on the community. - Discussion about positive reception to information provided to the community.
6 June 2024	- Homes still are on 3G network that will be turned off. - Bad internet in the mornings. - Opportunities support local events. - Opportunities to communicate with local community.
11 June 2024	No attendees.

Engagement Activity	Description
12 June 2024	- Community is more concerned with Transgrid as closer to town. - More accommodation needed. - Support for local events and facilities. - Interested in the project layout, location, fire, and noise.
28 June 2024	Follow up to in person meeting, and other updates.
18 August 2024	- Request received to provide support for the Moulamein "Show 'n' Shine" event. - Resulting discussion followed as the event was supported.
29 September 2024	- Request received to provide support for the Moulamein Races. - Event unable to be supported.
29 October 2024	- Request received to provide support for the Moulamein Fishing competition. - Event supported.
12 November 2024	- General Project update. - Opportunities associated with the Project. - Support for community events and activities.
8 March 2025 – 9 March 2025	Support for the Moulamein Fishing Competition.
19 April 2025	Support for the Moulamein Preschool Annual Yabby Races and Easter Fair.
24 April 2025	Update on South West Renewable Energy Zone Access Rights.
30 April 2025	Communication to share information regarding successful applicants for Access Rights.
Traditional Owners, Aboriginal Community Members and stakeholders, Aboriginal Partnerships and Registered Aboriginal Parties.	
26 May 2024	Meeting in person to discuss areas of interest and areas of concern.
28 June 2024	Follow up to in person meeting, and other updates.
25 July 2024	- Meeting in person to discuss: - General Project Update. - Development of an Aboriginal Participation Plan. - Completion of Cultural Awareness Training.
15 August 2024	- Meeting online to introduce the Project. - Develop an Aboriginal Partnerships Plan. - Participation in workshops.
2 August 2024 – 16 August 2024	- Discussed preferred dates for workshop. - Invitation to Aboriginal Participation Plan workshop.
20 August 2024	Members of the Project Team participated in a day long On Country Cultural Awareness and Immersion session.
29 August 2024	- Discussion on the Aboriginal Participation Plan where discussion focused on: - Project overview and update. - Opportunities associated with the Project. - Interest areas of Aboriginal Rights Holders and stakeholders. - Development of an Aboriginal Participation Plan.
9 September 2024	Emails to confirm discussions regarding timing of test excavations.
10 September 2024	Follow up information, from Aboriginal Participation Plan workshop.

Engagement Activity	Description
17 September 2024	- Sharing of draft Aboriginal Participation Plan for feedback. - Discussion regarding the timing of test excavations.
18 September 2024	- Sharing of draft Aboriginal Participation Plan for feedback. - Discussion regarding the timing of test excavations.
19 September 2024	- Introduction to the proposed Project and project update. - Follow up information provided, post meeting, including NSW Government guidelines.
20 September 2024	Received and discussed Letter of Support for Keri Keri Wind Farm.
22 September 2024	Request received to provide support for community program.
9 October 2024 – 14 October 2024	Covering of Aboriginal Ancestral Remains (AAR).
24 October 2024	Discussion on the outcome of fund request where the program was not supported.
10 December 2024	ERM provided the updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and requested feedback from the RAPs.
20 December 2024	- Phone call raising concerns regarding not receiving ACHAR directly. - Email responding to Traditional Owners concerns about not receiving ACHAR directly.
9 January 2025	- Information provided by the Traditional Owner regarding preferred Archaeologist. - Printed copies of ACHAR provided via post.
10 January 2025	Email to provide link and advise that printed copies of the ACHAR were provided via post.
13 January 2025	Provided updated ACHAR link directly to Traditional Owner. Had previously been provided via a Registered Aboriginal Party.
15 January 2025 – 21 May 2025	Covering of Aboriginal Ancestral Remains (AAR).
23 January 2025	Status of the project and ability to fund works requested.
1 February 2025	- Discussion covered several topics: - General Project update. - Feedback on proposal to cover Aboriginal ancestral remains. - Communication regarding unsuccessful in application for Access Rights. - Check in regarding updated Aboriginal Cultural Heritage Assessment Report (ACHAR)
2 February 2025	- Discussion covered several topics: - General Project update. - Feedback on proposal to cover Aboriginal ancestral remains. - Communication regarding unsuccessful in application for Access Rights. - Check in regarding updated Aboriginal Cultural Heritage Assessment Report (ACHAR)
5 February 2025	Follow up information provided, including information from the Aboriginal Participation Plan workshop.
2 November 2025	ERM provided the updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and requested feedback from the RAPs.

Engagement Activity	Description
Murray River Shire Council	
10 May 2024	Notification of submission of the EIS and intention to be available in local communities during the Public Exhibition period.
1 July 2025	Update on Response to Submission timeframes.
17 July 2025	Murray River Council provided an update on Council staff.
20 October 2025	- Introduction of Project and Project Team - for new Council staff. - Request to provide update.
29 October 2025	Letter of Intent to enter into a Planning Agreement in relation to the Keri Keri Wind Farm.
7 November 2025	- Several topics were discussed during this in person meeting covering: - Introduction to Project for new personnel. - General Project update. - Feedback on updated Council submission. - Council interest areas and feedback. - Voluntary Planning Agreement.
10 November 2025	Follow up information provided post in person meeting.
Balranald Shire Council	
10 May 2024	Notification of submission of the EIS and intention to be available in local communities during the Public Exhibition period.
20 October 2025	- Introduction of Project and Project Team - for new Council staff. - Request to provide update. "
6 November 2025	ERM provided the updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and requested feedback from the RAPs.
10 November 2025	Follow up information provided post in person meeting.
Hay Shire Council	
10 May 2024	Notification of submission of the EIS and intention to be available in local communities during the Public Exhibition period.

3.2 PROJECT AMENDMENTS

The Applicant has made amendments to the Project since the EIS was exhibited. 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; and
- Maximised the yield of wind power generation through optimising the position of WTGs on-site and in consideration of heritage and environmental constraints.

Specifically, the amendments include:

- 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;
- 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;
- Reduction in the number of proposed 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.

The Amended Project provides the following environmental and social benefits:

- 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 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 18,048;
- Reduction in the number of species offset credits by 118,153;
- 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 disturbance by the Project.

Mitigation measures recommended for the Amended Project have been updated to ensure potential impacts are appropriately managed and mitigated. The updated mitigation measures provide further rigour to mitigation strategies and improve the viability of the Project. A consolidated list of mitigation measures is provided in Appendix B of the Amendment Report.

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

TABLE 3-3 PROJECT AMENDMENTS SUMMARY

Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
Project Footprint			
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%)
WTGs			
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
Ancillary Infrastructure			
330 kV transmission line	20.0 km	16.21 km	Reduced by 3.79 km
Underground 33 kV transmission line	175.3 km	195.6 km	Increased by 20.3 km
Overhead 33 kV transmission line	64.5 km	0 km	Reduced by 64.5 km
New 220 kV or 330 kV transmission line (Switching Station to proposed connection point)	-	0.7 km	Increased by 0.7 km
33/330 kV Substations	3	3	No change
	200 m x 300 m +35 m APZ on all sides	190 m x 240 m +35 m APZ on 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	
BESS	200 MW / 800 MWh	200 MW / 800 MWh	No change
	400 m x 300 m +35 m APZ on all sides	400 m x 300 m +35 m APZ on all sides	
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: - Port of Adelaide; and - Port of Newcastle.	From: Port of Adelaide only.	Elimination of transport route from Port of Newcastle
Temporary Facilities / Activities			
Construction Duration	24 months, with peak construction activities over approx. 12 months	18 months, with peak construction activities over approx. 12 months	Duration reduced by 6 months
Construction Workforce	Up to 650 FTE	Up to 650 FTE	No change

Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
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 areas)	2	2	No change
Construction Carpark	0	2	Increased by 2
APZ Requirements for Temporary Facilities	Minimum 20 m per meteorological mast Minimum 20 m all sides of buildings	Minimum 20 m per meteorological mast Minimum 20 m all sides of buildings	No change

3.3 ADDITIONAL ASSESSMENT OF ENVIRONMENTAL AND SOCIAL ASPECTS

Technical assessments undertaken to inform the EIS have been updated, as necessary, to address relevant matters raised in submissions, to assess the amended Project layout, and/or to undertake further due diligence for the Project.

Technical assessments that have been updated include:

- Amended Aboriginal Cultural Heritage Assessment Report (ACHAR), Appendix E of the Amendment Report;
- Amended Biodiversity Development Assessment Report (BDAR), Appendix D of the Amendment Report;
- Addendum to the Landscape and Visual Impact Assessment (LVIA), Appendix F of the Amendment Report;
- Amended Noise and Vibration Impact Assessment (NVIA), Appendix G of the Amendment Report;
- Addendum to the Flood Impact Assessment, Appendix H of the Amendment Report;
- Amended Traffic Impact Assessment, Appendix I of the Amendment Report, which includes an Updated Transport Route Assessment;
- Amended Aviation Impact Assessment, Appendix J of the Amendment Report;
- Amended Telecommunications Impact Assessment, Appendix K of the Amendment Report;
- Amended Agricultural Impact Assessment, Appendix L of the Amendment Report;
- Amended Response to DPHI RFI regarding the Preliminary Hazard Analysis, Appendix M of the Amendment Report;
- Updated Economic Assessment, Appendix N of the Amendment Report;
- Preliminary Site Investigation, Appendix O of the Amendment Report; and
- Transport Route – Aboriginal Cultural Heritage Due Diligence, Appendix P of the Amendment Report.

Where necessary, these assessments are referenced in Section 4 and Section 5 of this report.

The Amended BDAR was supported by additional field surveys, including:

- Bird utilisation surveys (BUS) and targeted threatened fauna surveys undertaken from 27 to 31 May 2024;
- Biodiversity Assessment Method (BAM) plots, targeted threatened flora and fauna surveys undertaken from 15 to 28 September 2024;
- BUS, BAM plots, targeted flora and fauna surveys undertaken from 26 to 30 November 2024; and
- BAM plots, targeted flora and fauna surveys undertaken from 29 September to 2 October 2025.

The Amended ACHAR was informed by further consultation with Registered Aboriginal Parties (RAPs). RAPs were also given the opportunity to provide comments on the Amended ACHAR.

4. RESPONSES TO GOVERNMENT AGENCY AND COUNCIL SUBMISSIONS

This Section responds to the submissions received from government agencies and Murray River Council.

No government agency objected to the Project. Several provided comments seeking additional information or clarification or have recommended specific consent conditioning to meet their requirements. Others stated they have no further comments on the Project. A copy of the original submissions is available on the Major Projects portal: [Keri Keri Wind Farm | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#).

A response to each of the matters raised in submissions to the Project by the government agencies and Murray River Council is provided in Table 4-1 through to Table 4-14.

4.1 BCS AND NSW NPWS

TABLE 4-1 BIODIVERSITY, CONSERVATION AND SCIENCE GROUP (BCS) AND NSW NATIONAL PARKS AND WILDLIFE SERIVCES (NPWS)

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-1	Biodiversity	Provide further detail on the efforts the proponent has made to avoid and minimise impacts to SAII entities.	An Amended BDAR has been prepared to address submissions raised by the BCS Division of DCCEEW. The Updated BDAR includes further discussion on the efforts the Applicant has made to avoid and minimise impacts to entities at risk of serious and irreversible impact (SAII).	Appendix D of Amendment Report
BCS/ NPWS-2	Biodiversity	Complete further assessments and survey to adequately assess the impacts to Austral Pillwort and Plains-wanderer.	Additional surveys to assess the potential impacts on the Austral Pillwort (<i>Pilularia novae-hollandiae</i>) and Plains-wanderer (<i>Pedionomus torquatus</i>) were undertaken in autumn, spring and summer of 2024, and spring of 2025. The assessment for these species has been updated in the Amended BDAR. [See response to BCS/NPWS-23]	Section 2.3 and Section 5.3 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-3	Biodiversity	Make corrections to the vegetation classification, stratification and mapping that underpin the impact assessment, which are likely to affect the biodiversity credit obligation	The Amended BDAR includes updated vegetation classification, stratification and mapping. This has resulted in changes to delineation of PCTs mapped across Subject Land. This has been informed by significant additional field work, including BAM plots, transects and integrity assessments. The BAM-calculator (BAM-C) case for the Project has been updated to consider the updated vegetation and revised assessment of threatened communities and species. The amended Project layout, and additional biodiversity surveys undertaken has resulted in a reduction in the biodiversity credit obligation for the Project by 136,507 credits.	Section 4.2.3 and Section 2.2.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-4	Biodiversity	Fully assess, based on appropriate surveys, the impact of operation of the proposal on bird and bats at risk of turbine strike	Additional BUS were undertaken in autumn and spring of 2024. These BUS completed the appropriate survey requirements as per 'Wind Farms – turbine strike assessment and adaptive impact management. Biodiversity Assessment Method Guide' (NSW DCCEEW, 2024b). The collision risk assessment has been updated to consider the additional BUS and bat call data and the amended Project layout.	Section 6.2 and Section 6.3 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-5	Biodiversity	Provide further information to identify all impacts of the proposal, including ancillary infrastructure and indirect impacts	The Project description including ancillary infrastructure has been provided, the Subject Land has been defined, and direct and indirect impacts have been assessed for the entire area.	Section 2.1 and Section 8 of the Amended BDAR – Appendix D of the Amendment Report
BCS/ NPWS-6	Biodiversity	Provide additional and more specific detail to allow BCS to assess if the proposed mitigation measures will be effective in managing residual impacts	Management plans to be implemented post-approval designed to avoid and minimise impacts to biodiversity are detailed.	Section 8.5 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-7	Biodiversity	Provide an assessment of the proposal's impact on Matters of National Environmental Significance (MNES) that is compliant with Australian Government guidelines and that will allow BCS to complete a Bilateral Assessment in accordance with the SEARs.	Significant impact assessments for all MNES identified in Table 1 1 have been conducted within this BDAR following the results of targeted surveys conducted.	Section 1.1.4 and Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-8	Biodiversity	BCS and NPWS recommendations are provided in Attachment A. Detailed comments are provided from BCS in Attachment B and from NPWS in Attachment C. The project has been determined as a controlled action under the Commonwealth's Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and impacts to EPBC Act-listed entities will be assessed under the Assessment Bilateral Policy. This response includes comments and recommendations related impacts to MNES to ensure that the assessment report that we prepare for the Australian Government contains all relevant information. Attachment D details the information and data we require for this assessment. BCS requests that the proponent be required to develop all plans required as a Condition of Approval that relate to flood risk management or biodiversity in consultation with BCS so our issues are adequately addressed.	Noted. An Amended BDAR has been prepared to address the submissions from BCS Division of DCCEEW. Further detail on how the key issues raised by the BCS have been addressed are provided under each topic raised in Attachment B, C and D of the submissions in the following table sections.	Appendix D of the Amendment Report
BCS/NPWS Attachment A (AA) & Attachment B (AB)				
BCS/ NPWS-9	Flooding	1.1 Actively engage with the local Council and the NSW SES to demonstrate that emergency management matters have been discussed and supported. This should inform the development of a site-specific flood emergency response plan.	Noted. The Applicant has and will continue to engage with Murray River Council and the NSW State Emergency Services (SES) regarding flood emergency management. Both council and the NSW SES will be consulted during the preparation of the Flood Emergency Response Plan.	Addendum to the Flood Impact Assessment - Appendix H of Amendment Report
BCS/ NPWS-10	Flooding	2.1 Investigate the potential riverine risk posed to the project site because of breakout flows originating from the Murrumbidgee River during the extreme event scenario.	An Addendum to the Flood Impact Assessment has been prepared, including consideration of breakout flows originating from the Murrumbidgee River during extreme flood events. The Addendum to the Flood Impact Assessment also provides updated flood modelling and assessment of impacts associated with the Amended Project. The updated Project layout has considered flood risk. Where necessary, mitigation measures have been updated and are provided in Appendix H of the Amendment Report	Appendix H of Amendment Report
BCS/ NPWS-11	Flooding	3.1 Ensure future hydraulic models include the detailed designs associated with proposed project infrastructure to adequately demonstrate the impact of the project on flood behaviour.	Noted. As necessary, hydraulic models will be updated to include the detailed design. Conversely, the hydraulic model will be used to inform the detailed design, such that impacts are minimise or avoided. The Applicant will continue to assess the potential impact of the project on flood behaviour as the design progresses.	This table
BCS/ NPWS-12	Biodiversity	The candidate list of threatened species, survey effort, suitable habitat and species polygons require review as they include errors or have not been prepared in accordance with the BAM. 4.1 Update the BDAR to ensure that the exclusion of suitable habitat for all candidate species (and ecosystem species) is in accordance with the BAM.	Exclusion of candidate species from further assessment has been undertaken in accordance with the BAM as justified by habitat or geographical constraints. No species have been excluded because of degraded habitat; however, the Subject Land is degraded.	Section 5.2 of the Amended BDAR - Appendix D of the Amendment Report.
BCS/ NPWS-13	Biodiversity	4.2 Prior to determination, conduct surveys for candidate species which have been excluded based on the presence/absence of nearby records.	Surveys have been conducted for candidate species in accordance with their respective guidelines. Discussion of species records is provided to further justify the conclusion of their presence/absence.	Section 2.2.3 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-14	Biodiversity	5.1 Provide details of threatened flora survey effort (including in all areas mapped as PCT 44) to demonstrate how much of each associated PCT has been surveyed during the required months.	Threatened flora survey effort has been detailed, quantified and presented in maps within the Amended BDAR.	Section 2.2.3 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-15	Biodiversity	5.2 Provide additional information to confirm threatened species surveys were conducted in accordance with relevant guidelines and TBDC for the following species and guilds: <i>Ardeotis australis</i> (Australian Bustard), Forest owls, Microbats, and Amphibians. If additional surveys cannot be undertaken, presence must be assumed or an expert report provided.	Threatened species survey effort conducted with reference to their relevant guidelines are presented within the Amended BDAR. Surveys performed are adequate. No assumed presence or expert report is required.	Section 2.2.4 of the Amended BDAR - Appendix D of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-16	Biodiversity	5.3 Survey using harp trapping to determine the presence or absence of <i>Myotis macropus</i> and <i>Nyctophilus corbeni</i> within the subject land.	The EIS did not conclusively find Corben’s Long-eared Bat (<i>Nyctophilus corbeni</i>). The microbat surveys performed throughout the Project Area resulted in the detection of a long-eared bat species (i.e., <i>Nyctophilus</i> spp.). A subsequent longitudinal sample obtained from the bat detectors installed on the meteorological mast (i.e., three bat detectors at varying heights from installed and recording from November 2024 to April 2025) resulted in the ‘possible’ detection of <i>Nyctophilus gouldii</i> and <i>Nyctophilus geoffroyii</i>. This latter result indicates that the earlier survey is likely to have detected these species and not Corben’s Long-eared Bat. As per Section 5.1.1 of the BAM, a targeted survey is not required to identify or confirm the presence of an ecosystem species. Corben’s Long-eared Bat (<i>Nyctophilus corbeni</i>) is an ecosystem predicted species. Therefore, targeted survey such as the use of harp traps for <i>Nyctophilus corbeni</i> is not required and has not been conducted. Surveys for the Southern Myotis (<i>Myotis macropus</i>) were completed via ultrasonic bat detection methods. The first Project Area wide survey resulted in the detection of the species. These surveys targeted potential habitat such as water bodies and areas with tree cover. Such habitat features are greater than 200 m away from the Subject Land. The second survey (i.e., recordings from bat detectors installed on meteorological mast) was for a longer survey period (i.e., ~ 5 months), within the sampling period for this species as prescribed in the BAM (i.e. October to March). This survey failed to detect any occurrence of the Southern Myotis (<i>Myotis macropus</i>). No permanent or semi-permanent waterbodies occur within 200 m of the Subject Land, which is the species polygon specification for the species (i.e., is a fishing bat and is reliant on waterbodies for foraging). Thus, it is not possible to construct a species polygon for <i>Myotis macropus</i>, even if it occurs within the Project Area (i.e., no PCT associated with the species occurs within development footprint). Harp trapping is not required to make this conclusion and has not been completed for this reason.	Section 5.1.1 and Section 5.2 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-17	Biodiversity	5.4 Include <i>Myotis macropus</i> in Table 5.3 of the BDAR and assess it in accordance with Section 4.1.1 of the Biodiversity Assessment Method Operational Manual - Stage 1.	The Southern Myotis (<i>Myotis macropus</i>) has been manually added and assessed as a candidate species within this BDAR (i.e., not a species predicted to occur in semi-arid chenopod shrublands). Sufficient targeted surveys have been performed for the species. There will be no direct impact on the microhabitat of this species (i.e., no areas of permanent or semi-permanent waterbodies within 200 m of the Subject Land), which is the species polygon specification for the species. Thus, it is not possible to construct a species polygon for <i>Myotis macropus</i>, even if it occurs within the Project Area (i.e., no assessable habitat occurs within development footprint). The BAM Operational Manual - Stage 1 was reviewed to understand what specifications exist within Section 4.1.1 as being required in the BDAR. There is no Section 4.1.1 in the BAM Operational Manual - Stage 1. As outlined above, the BDAR is compliant with Section 5.2 of the BAM (i.e., assess habitat suitability for threatened species). There will be no direct impact on the Southern Myotis, thus no species polygon is required for this species.	Section 5.2 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-18	Biodiversity	6.1 After survey is completed, revise all species polygons for ‘area’ species to include all suitable habitat.	Species polygons have been revised to reflect survey findings and species polygon rules established under the BAM.	Section 5.2.5 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-19	Biodiversity	7.1 Ensure any additional targeted survey to reduce the area of assumed presence is finalised and included in a revised BDAR before the project is determined.	Adequate additional targeted surveys have been conducted (September 2024) with results presented within this Amended BDAR. Presence of these species is no longer assumed in the Amended BDAR.	Section 2.2.3 of the Amended BDAR – Appendix D of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-20	Biodiversity	The assessment and calculation of direct impacts does not include all impacts. 8.1 Identify all ancillary infrastructure and revise the assessment and BAM-C to include all direct and indirect impacts to biodiversity.	The Project description including ancillary infrastructure has been provided, the Subject Land has been defined, and direct and indirect impacts have been assessed for the entire area.	Section 2.1 and Section 8 of the Amended BDAR – Appendix D of the Amendment Report
BCS/ NPWS-21	Biodiversity	9.1 Revise the assessment to include all impacts to native vegetation along the haul route and include in separate BAM-C cases.	Assessment of the revised transport route has been included in the Amended BDAR	Appendix D of Amendment Report
BCS/ NPWS-22	Biodiversity	BCS is unable to advise on Serious and Irreversible Impacts (SAII) as the SAII assessment is incomplete. 10.1 Update section 9.1 to present the impacts to the SAII entity Plains-wanderer.	At the request of CPHR, an assessment is provided for the potential SAII entity Plains-wanderer (<i>Pedionomus torquatus</i>). The Project has avoided impacts on this species.	Section 9.1 of the Amended BDAR – Appendix D of the Amendment Report
BCS/ NPWS-23	Biodiversity	11.1 Survey for <i>Pilularia novae-hollandiae</i> and complete a SAII assessment.	The Austral Pilwort (<i>Pilularia novae-hollandiae</i>) is associated with PCT 44, which is not being impacted by the amended Project. Microhabitat surveys were conducted for the Austral Pillwort (<i>Pilularia novae-hollandiae</i>) in December 2024. The species was not detected within this microhabitat (i.e., south of Abercrombie Creek) with the area of microhabitat to be avoided by the Project. The assessment of the amended design has reasonably concluded that the species is absent from the Subject Land (i.e., areas of associated PCT have been avoided and no area of microhabitat located outside associated PCTs within the impact footprint is known to contain the species). No SAII assessment has been completed as the species and its associated PCT habitat is absent from the Disturbance Footprint.	Section 2.2.3 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-24	Biodiversity	PCT and vegetation zone identification and mapping need to be revised as they have inaccuracies that can affect the biodiversity credit calculation. 12.1 Revise the PCT mapping to more accurately reflect vegetation and edaphic patterns evident on aerial imagery.	PCT mapping of the Subject Land has been completed at a scale of 1:1,000 using recent high-resolution imagery, BAM plots and rapid vegetation assessments.	Section 2.2.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-25	Biodiversity	12.2 Sample additional VI plots to demonstrate that PCT allocation and vegetation condition across the subject land has been adequately sampled and mapped.	Additional BAM plots have been completed to inform the vegetation mapping and vegetation integrity scores (VISs) of the Subject Land.	Section 2.2.2.4 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-26	Biodiversity	12.3 Consider if the use of 'wet' benchmarks is applicable.	Not applicable. Obtained a more contemporary set of BAM plots relevant to the Project from a period with average rainfall.	This table
BCS/ NPWS-27	Biodiversity	12.4 Update Table 2-4 or include a table in Chapter 4 that shows, for each vegetation zone, the BAM plot identifiers for plots within the Disturbance Footprint, within the subject land, and any BAM plots outside the subject land that were used in vegetation zone calculations, including distance to the vegetation zone.	BAM plots used for mapping native vegetation and calculating VI have been listed against their corresponding vegetation zone and displayed in a figure (Figure 2-5 of the Amended BDAR), including those outside the Subject Land used to calculate VISs.	Section 2.2.2.4 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-28	Biodiversity	12.5 Revise the BDAR and spatial data to ensure the numbering of vegetation zones is consistent with the BAM-C.	Vegetation zone numbering has been ensured to be consistent throughout the BDAR, spatial data and BAM-C	Section 4.2.8 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-29	Biodiversity	12.6 Revise the CLUSTER analysis to ensure BAM plot identifiers correspond with field datasheets and spatial data.	CLUSTER analysis has been updated to reflect revised vegetation mapping and to correspond to field data sheets and spatial data.	Section 4.2 of the Amended BDAR – Appendix D of the Amendment Report.

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BCS/ NPWS-30	Biodiversity	12.7 Justify the use of annual native and weed species in the floristic analysis.	Weed species have been removed. Annual native species have been retained in the analysis as the BAM does not state that annual native species can be removed from the consideration of PCT identification. PCT descriptions include annual species. Removing annual species from the analysis would impair its utility in identifying PCTs.	Section 4.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-31	Biodiversity	12.8 Provide a more complete discussion of the CLUSTER analysis and results with reference to the influence of number of samples, seasonal variation, rainfall records, and variation in disturbance, condition, vegetation patterns across the Project Area, and the NSW PCT classification.	Additional discussion provided in the CLUSTER analysis. Statistical evidence confirms prior analysis. A detailed consideration of rainfall records is not provided as plot data used in the analysis is from years with average annual rainfall.	Section 4.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-32	Biodiversity	13.1 Revise the vegetation classification to demonstrate if PCT 44 occurs and include any mapped areas as the original PCT. Separately map different condition states of PCTs 163 and 164 where they exist.	PCT 44 has been avoided by the amended Project and no longer occurs within the Subject Land. Mapping of the different condition states (vegetation zones) of PCTs 163 and 164 are shown in Figure 4 3 of the Amended BDAR.	Section 4.2.8 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-33	Biodiversity	14.1 Revise vegetation zone mapping and descriptors according to BAM section 4.3.1. Include additional justification if further ground-truthing demonstrates that one vegetation zone is adequate to represents the variation of each PCT present in the subject land.	PCT 164 has been delineated into several vegetation zones representative of the various condition states observed throughout the Subject Land.	Section 4.2.8 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-34	Biodiversity	14.2 Ensure vegetation zones in high condition are indicated as such in the BDAR, BAM calculator, and spatial data.	Vegetation zones are detailed throughout the BDAR and their corresponding VIS discussed.	Section 4.2.9 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-35	Biodiversity	Specific detail is lacking to show how the proponent has avoided and minimised biodiversity impacts. 15.1 Provide detail for all avoid and minimise measures to be implemented through post-approval EMPs, in accordance with BAM 7.1.2 and 7.2.2(2).	Management plans to be implemented post-approval designed to avoid and minimise impacts to biodiversity are detailed.	Section 8.5 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-36	Biodiversity	15.2 Document measures to minimise impacts to raptors at proposed turbines that are within 500 m of recorded stick nests.	Amendments to the Project design have ensured no turbines are within 500 m of a stick nest suitable for use by raptors.	Section 7.1.2.1 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-37	Biodiversity	15.3 Document the difference in biodiversity impacts between the scoping layout and the layout presented in the EIS.	A discussion of the differences in impacts to biodiversity values between the current Project design and the layout presented in the EIS has been provided	Section 7.1.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-38	Biodiversity	Assessment of prescribed and indirect impacts associated with the operation of the proposed project are insufficient and require review. 16.1 Revise the identification and assessment of all prescribed impacts according to BAM sections 6 and 8.3, with reference to current ecological knowledge, literature and existing species records.	The identification and assessment of prescribed impacts have been updated.	Section 6 and Section 8.3 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-39	Biodiversity	16.2 Review the assessment to address the connectivity values of naturally open or non-woody native vegetation. Revise in detail all aspects of the BDAR where connectivity has been assessed and/or is relied on to justify exclusion of species from the assessment.	The Project has avoided major waterways/creeks (i.e., Abercrombie Creek).	This table
BCS/ NPWS-40	Biodiversity	17.1 Revise the information in section 7 of the BDAR to clearly address the prescribed impact identification requirements in BAM section 6.1.5, the avoid and minimise considerations in BAM section 7.2.1, and the assessment of the (prescribed) impacts of wind turbine strike in BAM section 8.3.5.	The assessment of prescribed impacts has been updated and includes discussion of avoid and minimise measures, including assessment of impacts of wind turbine strike.	Section 6 and Section 8.3 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-41	Biodiversity	17.2 Revise the prescribed impact assessment to justify the exclusion of protected birds and bats.	Protected birds and bats excluded from the collision risk modelling is due to the absence of observations in the rotor swept area. It is not possible to model species where there are no observations.	This table

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-42	Biodiversity	17.3 Revise the list of vagrant species to comply with BAM section 5.2.2 and the BAM glossary and revise the assessment to include any species that do not meet the BAM definition of vagrant.	The Amended BDAR no longer excludes any candidate species from further assessment based on vagrancy as survey has been completed to demonstrate that the species are absent.	Section 5.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-43	Biodiversity	17.4 Prepare a separate BBAMP that is appended to the BDAR.	A draft BBAMP has been prepared as a standalone document and appended to the Amended BDAR.	Appendix A of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-44	Biodiversity	18.1 Conduct a full two years of pre-construction BBUS, across all seasons and including paired at height data to ensure the BBAMP is supported by sufficient data.	A full two years of pre-construction BBUS has been conducted. Methodology is discussed and the BBAMP is supported by sufficient data.	Section 2.2.5 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-45	Biodiversity	18.2 Provide the raw data from BBUS results in the revised BDAR and digital data package.	Raw data from the BBUS has been attached as an appendix and has been provided with the digital data package.	Appendix B of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-46	Biodiversity	19.1 Revise the draft BBAMP in consultation with BCS, and ensure outcomes based on the results of the BBUS data are fully justified with supporting information and literature.	The draft BBAMP is based on the results of bird and bat survey results and relevant supporting literature. It is anticipated that this draft report would be finalised to the satisfaction of the consent authority following Project approval and prior to construction.	Appendix A of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-47	Biodiversity	The indirect impact assessment requires review. 20.1 Identify and assess all indirect impacts of the proposal on native vegetation and habitat during construction and operation in Section 8.2 and Table 8-4 and include the results in Section 11.4.	The assessment of indirect impacts has been revised and considered in the management measures discussed in the Amended BDAR.	Section 8.2 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-48	Biodiversity	20.2 Provide details for all measures necessary to mitigate or manage indirect impacts.	Measures for mitigating or managing indirect impacts are discussed in the Amended BDAR.	Section 8.5 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-49	Biodiversity	Mitigation measures are not specific to the impact, location or affected threatened entities. 21.1 Revise Table 8-7 to detail auditable mitigation and management measures to be implemented through post-approval plans.	The discussion of mitigation and management measures to be implemented post-approval has been revised.	Section 8.4 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-50	Biodiversity	21.2 Include a unique identifier for each mitigation measure in Table 8-7 and ensure they correspond with the EIS.	The mitigation measures have been assigned a unique identifier within the Amended BDAR (Table 8-7 in the revised BDAR).	Section 8.4 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-51	Biodiversity	The assessment of Matters of National Environmental Significance requires review. 22.1 Provide a section or chapter in the BDAR and specifically address each of the Bilateral assessment requirements detailed in BDAR Section 1.1.4 and Table 1-1 (and Attachment D to this response).	A review of impacts on MNES is provided. No significant impact on MNES is deemed likely.	Section 5.3 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-52	Biodiversity	Administrative Issues 23.1 Update landscape assessment buffers to include both site based and linear buffers as appropriate and review percent native vegetation categories at completion.	As per Section 3.1.2 of the BAM and note that the Assessment Area is determined by a buffer of 1,500 m surrounding the outside edge of the boundary of the Subject Land OR 500 m along each side of the centre line of a linear shaped proposal. The Keri Keri wind farm is predominantly a linear shaped proposal and, for this reason, the 500m buffer has been applied. Either buffer option will not alter the calculation of native vegetation cover as both calculations will conclude >70% native vegetation, being the highest category stated in s3.2(3) of the BAM. No amendment to the buffer distance is proposed.	Section 4.2.1 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-53	Biodiversity	23.2 Update the BAM-C case to be a site based rather than a linear based assessment.		
BCS/ NPWS-54	Biodiversity	24.1 Update the BAM-C to be consistent with the BDAR.	The BAM-C is consistent with the BDAR. Reports generated from the BAM-C that have informed the Amended BDAR have been appended.	Appendix D of the Amended BDAR – Appendix D of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
BCS/NPWS Attachment A (AA) & Attachment C (AC)				
BCS/ NPWS-55	National Parks and Wildlife Services	National Parks and Wildlife Services 1. Recognition of Yanga State Conservation Area Revise the EIS, and relevant appendices to: 1.1 apply the NPWS Guidelines - <i>Developments adjacent to National Parks and Wildlife Service lands</i> <i>NSW Environment and Heritage</i> (DPIE, 2020) in recognising environmental matters relevant to development adjacent to Yanga SCA.	The Yanga State Conservation Area has been considered and included within the Amendment Report. As per the NPSW Guidelines, the Amendment report has considered risks of erosion and sedimentation, stormwater runoff, wastewater, pests and weeds, fire, boundary encroachments, amenity impacts (visual, noise, air quality), ecological connectivity and cultural heritage to the neighbouring Yanga SCA, and mitigation measures updated.	Section 6 of the Amendment Report, Appendix B – O of the Amendment Report.
BCS/ NPWS-56	National Parks and Wildlife Services	1.2 ensure relevant figures in the EIS and supporting technical appendices adequately and consistently display (and reference) Yanga State Conservation Area, Yanga National Park and Yanga Nature Reserve.	Noted.	Figure 1-1 and Figure 1-3 of the Amendment Report.
BCS/ NPWS-57	National Parks and Wildlife Services	1.3 use the NSW SEED data – NSW National Parks and Wildlife Service (NPWS) Estate layers to ensure true and correct representation of land reserved and acquired under the <i>National Parks and Wildlife Act 1974</i> .	Noted.	Figure 1-1 and Figure 1-3 of the Amendment Report.
BCS/ NPWS-58	National Parks and Wildlife Services	1.4 provide an adequate and clearly stated buffer distance between the nearest Wind Turbine Generator (WTG) and the Yanga SCA boundary acknowledging the placement distance and any issues arising from its proximity to Yanga SCA. This is relevant to buffers afforded from WTG 76 and 77, WTG 105 and 106, WTG 128 and 129 and WTG 153 along the western edge of the proposed project.	Section 5.4.2 of the Draft Wind Energy Framework (2023) recommends that turbines are sited at least 100 m (from blade tip to nearest canopy height) away from National Parks, state conservation areas and nature reserves. The amended Project layout shows that the closest turbine to the Yanga SCA (WTG149) is over 1.2 km from the Yanga SCA boundary. WTG 76, WTG 77, WTG 105, WTG 106, WTG 128, WTG 129 and WTG 153 have all been removed from the Project.	This table.
BCS/ NPWS-59	National Parks and Wildlife Services	1.5 confirm the location of the workers accommodation camp as it relates to the project development site and distance away from Yanga SCA, recognising the designated primary service access point for the camp.	The workforce accommodation camp is over 10 km from the Yanga SCA boundary. Primary access to the workforce accommodation camp will be from the Sturt Highway; however, if required in an emergency, Keri Keri Road access may also be used. The location of the workforce accommodation camp provides efficient connectivity to the project site while aligning with relevant environmental and operational guidelines regarding proximity to Yanga SCA.	This table.
BCS/ NPWS-60	Transmission and Grid Infrastructure	2. Allow for colocation of transmission and grid connection infrastructure. 2.1 Acciona Energy Australia Global Pty Ltd and Department of Planning, Housing and Infrastructure (Planning) consider consolidation of, and colocation of transmission and grid connection infrastructure so undue pressure is not placed on land reserved under the <i>National Parks and Wildlife Act 1974</i> .	Noted. The Applicant has consulted with DPHI regarding the consolidation of transmission and grid connection infrastructure for the Project.	This table.
BCS/ NPWS-61	Visual	Revise the EIS, and Appendix K to ensure: 3.1 recognition of all land reserved and acquired under the NPW Act as a state significant conservation land use, not minimal use as depicted and described in the LVIA.	Noted.	Section 6.5 of the Amendment Report
BCS/ NPWS-62	Visual	3.2 <i>NSW Dark Sky Planning Guidelines</i> (DPE, 2023) are utilised as a guide in designing adequate lighting to avoid excessive light spill into the night sky to protect Yanga SCA night sky values where possible.	The Project is not located within the Dark Sky Region. The Applicant will consider the recommended lighting practices (Section 4.2 of the Dark Sky Planning Guidelines) during the detailed design phase of the Project. Section 11.5 of the LVIA and Section 3 of the Addendum to the LVIA provide mitigation measures to avoid or minimise impacts from night lighting. The Applicant will incorporate these into the Project design.	This table
BCS/ NPWS-63	Visual	3.3 <i>National Light Pollution Guidelines for Wildlife</i> (DCCEEW, 2023) to ensure adequate design and consideration of the natural (biodiversity) values attributed to Yanga SCA and ensure: (a) aviation hazard lighting on WTGs and meteorological masts (referred to as wind monitoring towers (WMTs) as advised by Civil Aviation Safety Authority (CASA) is appropriately designed and operated. (b) internal project lighting installed at the substations and other buildings for occupation (Workers Accommodation Camp), night work, security and emergency operational purposes are designed to reduce light pollution and excessive light spill on to Yanga SCA.	An Addendum to the LVIA has been considers the Workforce Accommodation Camp, security and other ancillary infrastructure. The updated mitigation measures are included within the Amendment Report and include measures to reduce to design night lighting to have a minimal impact on the surrounding environment.	Appendix F of Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-64	Visual	3.4 confirm workers accommodation camp location and design ensuring common areas, and car parking are confined to the internal (central) zones to contain or reduce incidence of light spill outside of the confines of the camp.	The workforce accommodation camp is over 10 km from the Yanga SCA boundary. Primary access to the workforce accommodation camp will be from the Sturt Highway; however, if required in an emergency, Keri Keri Road access may also be used. The location of the workforce accommodation camp provides efficient connectivity to the project site while aligning with relevant environmental and operational guidelines regarding proximity to Yanga SCA.	This table.
BCS/ NPWS-65	Visual	Take into consideration the impacts on the visual environment with respect to Yanga SCA as it relates to the zone of visual influence, viewpoints situated in Yanga SCA, not just the Willows Picnic Area and Campground (as VP08), other areas include: (b) NPWS staff accommodation (residential sites) Oakhampton cottage and Oakhampton Irrigation cottage	Noted. The zone of visual influence is a preliminary tool which does not account for intervening vegetation or landforms that may screen the view to a proposed project. The Yanga Homestead and NPSW staff accommodation are located approximately 25 km and 14 km respectively from the western boundary of the Project. The Addendum to the LVIA includes an assessment of potential impacts from the Project on these public viewpoints.	Appendix F of Amendment Report
BCS/ NPWS-66	Visual	3.6 provide for an assessment of shadow flicker on Yanga SCA and effects on the values of Yanga SCA, especially natural (biodiversity) values and Keri Keri Road safety (as used by NPWS staff, Yanga SCA visitors and commercial operators.	The Addendum to the LVIA includes an updated shadow flicker assessment, which has considered the amended Project layout. The removal of WTGs along the western boundary of the Project has eliminated the potential for shadow flicker for users of Keri Keri Road and, commensurately, there will be no shadow flicker impacts in the Yanga SCA. The Wind Energy Guidelines (DPHI, 2024) state that to avoid shadow flicker, turbines should be the distance of 265 m x the maximum blade chord length, which for the Project equates to a setback of about 1,140 m. The closest turbine to the Yanga SCA is over 1,200 m from the boundary.	Appendix F of Amendment Report
BCS/ NPWS-67	Noise and Vibration	Revise the EIS, and Appendix I to ensure: 4.1 acknowledge noise levels above 40dB(A) have the potential to impact on wildlife occupying Yanga SCA, this includes critically endangered bird species. NPWS advises noise levels during construction and operation of the proposed project on the Yanga SCA boundary interface is restricted to, not exceed 40sB(A). If exceedance occurs impacts on biodiversity values of Yanga SCA will need to be assessed in more detail.	The Amended Noise and Vibration Impact Assessment (Amended NVIA) includes modelling for the amended Project layout. A representative receptor was included on the boundary of the Yanga SCA. The Amended NVIA determined that noise from the Project at the representative viewpoint within the Yanga SCA would not exceed 16 dB(A), well below the threshold criteria of 40 dB(a) at the boundary.	Appendix G of Amendment Report
BCS/ NPWS-68	Noise and Vibration	4.2 noise limits with a baseline noise limit criterion of 35dB(A) is to be applied to all NPWS staff accommodation (residential sites) such as Oakhampton cottage and Oakhampton Irrigation cottage, please confirm.	The Amended NVIA has conservatively applied a base case noise limit criterion of 35 dB(A). 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.	Appendix G of Amendment Report
BCS/ NPWS-69	Noise and Vibration	4.3 recognition of the cultural access and use by the Aboriginal community, commercial tour operators and park-led vehicle tag-along tours, scientific survey and monitoring, and rewilding release as activities on Yanga SCA, assess how use and visitor experience will be affected by the proposed project construction and operation.	The Noise Policy for Industry (NPfI) 2017 provides recommended amenity noise levels that guide developers when considering impacts to neighbouring users. The NPfI considers the impacts of noise within various developments, including National Parks, which have a recommended amenity noise level (when in use) of 45 dB(A). Section 7.1.2 of the Amended NVIA assessed the Project amenity noise levels, and it is not anticipated that there will be any instances where users of the Yanga SCA will be negatively impacted by the Project.	Appendix G of Amendment Report
BCS/ NPWS-70	Noise and Vibration	4.4 blasting is adequately assessed as part of the EIS. This shall include impacts to the values (natural and cultural) of the Yanga SCA and in the maintenance of safe access via Keri Keri Road. Noting that a number of project WTGs are located on the immediate boundary of the project development site.	Geotechnical investigations are required to inform whether blasting is required for the construction of wind turbine foundations. If required, as per Section 8.3 of the NVIA, the Applicant will develop a Blasting Plan that identifies sensitive receivers. Provides appropriate buffers to these receivers, outlines monitoring and management measures to avoid or minimise impacts. The Blasting Plan will include Yanga SCA and Keri Keri Road as sensitive receivers.	This table. Appendix I of the EIS
BCS/ NPWS-71	Noise and Vibration	4.5 provide an acoustic (noise) monitoring program to ensure levels are adhered to, and effects on Yanga SCA can be adequately reported.	The Amended NVIA includes a representative receiver on the Yanga SCA boundary. As per Section 6.6 of Appendix I of the EIS, a Noise Monitoring Plan will be developed and implemented during the operational phase of the Project. The Noise Monitoring Plan will consider the location of the receiver during the operational phase, and the noise monitoring results at the receiver.	Appendix G of Amendment Report
BCS/ NPWS-72	Noise and Vibration	4.6 Assess how use and visitor experience will be affected by the proposed project construction and operation.	Section 7.1.2 of the Amended NVIA assessed the Project amenity noise levels, and it is not anticipated that there will be any instances where users of Yanga SCA will be negatively impacted by the Project.	Appendix G of Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-73	Traffic and Transport	Revise the EIS, and Appendix J to ensure: 5.1 improvements works required to the Sturt Highway and Keri Keri Road intersection, and the creation of the large area of hardstand on the inside corner of Keri Keri Rd to accommodate the OSOM vehicles is design to avoid all impacts to Yanga SCA.	Strategic designs for the upgrade of the intersection of Keri Keri Road and the Sturt Highway have been provided. These confirm that the intersection upgrades do not overlap with the Yanga SCA boundary and, therefore, impacts to the Yanga SCA are not anticipated.	Appendix I of the Amendment Report.
BCS/ NPWS-74	Traffic and Transport	5.2 Keri Keri Road site entrances (all 3) are fit for purpose, and the proponent can confirm no upgrades are required to service turning requirements or capabilities of the OSOM vehicles delivering wind farm components from Keri Keri Road into the project development site. Confirm no impacts to Yanga SCA.	Refer to response for BCS/NPWS-73.	Appendix J of the EIS
BCS/ NPWS-75	Traffic and Transport	5.3 secure, safe and unrestricted traffic flow can be maintained along Keri Keri Road with no impacts to NPWS park management access, Yanga SCA visitors, commercial operators and scientific/research access. Confirm if the road is fit for purpose.	The Traffic and Transport Impact Assessment (TTIA) (Appendix J of the EIS) assessed the Level of Service (LoS) and volume to capacity (V/C) threshold for both Keri Keri Road and the Sturt Highway. The assessment determined that both Keri Keri Road and the Sturt Highway would operate at LoS A (condition of free flow traffic) during the peak construction period. The Amended TTIA includes an assessment of the condition of Keri Keri Road and recommends that it is upgraded to allow all weather access for the duration of the construction period. An inspection and maintenance scheduled for Keri Keri Road will be developed in consultation with council and this will be implemented during construction.	Appendix J of the EIS Appendix I of the Amendment Report
BCS/ NPWS-76	Traffic and Transport	5.4 unsealed road standards are flagged. NPWS suggests the local road comply with the Unsealed Roads Best Practice Guide 2 (ARRB, 2020) with confirmation on all-weather status.	Noted. The Amended TTIA specifies the upgrades required for Keri Keri Road to all weather status. This is also addressed in the updated mitigation measures.	Appendix I and Appendix B of the Amendment Report
BCS/ NPWS-77	Traffic and Transport	5.5 confirm in consultation with council preferred speed limits for Keri Keri Road, and ensure signage is established, this will ensure all road users comply to ensure safety.	Noted. The Applicant will consult with council regarding speed limits for Keri Keri Road to be applied during construction. These will be detailed in a Construction Traffic Management Plan.	Appendix I of the Amendment Report
BCS/ NPWS-78	Traffic and Transport	5.6 In preparation of the Construction Traffic Management Plan (CTMP), ensure: (a) consultation with NPWS. (b) maintenance requirements for the duration of project construction on Keri Keri Road are specified. (c) inclusion of dust suppression during construction, as this forms a critical requirement in the prevent of dust/sediment smothering of threatened and sensitive flora on the interface of Yanga SCA and the Keri Keri Road corridor. (d) implementation of a Drivers Code of Conduct. This should cover expectations for driver behaviour covering the safety of Yanga SCA visitors, users and NPWS staff in undertaking land management functions utilising Keri Keri Road as critical access to Yanga SCA.	The Applicant will consult with NPWS when developing the CTMP. The Amended TTIA specifies road upgrades required for OSOM vehicle movements along Keri Keri Road, including strategic designs for the Keri Keri Road/Sturt Highway intersection. Mitigation measures have been updated as necessary. The Construction Environmental Management Plan (CEMP) will address a range of environmental issues and will include a Soil and Water Management Plan and Erosion and Sediment Control Plan. Dust suppression will be detailed within the CEMP. A Drivers Code of Conduct will be included in the CTMP and driving safety will be discussed in staff and contractor inductions.	Appendix I of the Amendment Report
BCS/ NPWS-79	Traffic and Transport	5.7 NPWS is included as an emergency contact, with the NPWS Lower Darling Area via npws.lowerdarling@environment.nsw.gov.au and 03 5021 8941 with emergency notification directed to NPWS Park Operations West Branch Duty Officer via Ph: 02 8275 17406.	Noted. The Applicant will include NPWS as an emergency contact for communications during the Project construction and operational phases.	This table.
BCS/ NPWS-80	Biodiversity	Revise the EIS and Appendix G to ensure: 6.1 biodiversity values are adequately considered in the context of Yanga SCA include likely impacts of noise and light pollution on threatened and migratory animals in this locality.	The Amended BDAR includes an assessment of prescribed impacts, including noise and light pollution.	Section 8.3 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-81	Biodiversity	6.2 Yanga SCA is considered for indirect and cumulative impacts on biodiversity, including impacts on landscape connectivity, migratory species importance and as likely release site for the Plains-wanderer <i>Pedionomus torquatus</i> .	The cumulative impact assessment in the Amended BDAR includes consideration of potential cumulative impacts on Yanga SCA.	Section 8.4 of the Amended BDAR – Appendix D of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-82	Biodiversity	6.3 threatened species and conservation significant as listed below are considered, as these have been observed in Yanga SCA, proximate to the project and the Keri Keri Road Reserve: a) Greenhood Orchid <i>Pterostylis pedina</i> observed on Yanga SCA and its likely to occur on the proposed project development site. b) Plains-wanderer <i>Pedionomus torquatus</i> require further assessment as this critically endangered species detected on Yanga SCA during sound monitoring programs. Although not considered a collision risk due to its ground dwelling nature, construction and operation of the proposed project will likely impact on habitat utilisation and resource use on Yanga SCA. c) Australian Bustard <i>Ardeotis australis</i> has been observed on the parks, the proposed project will likely impact on habitat utilisation and resource use. d) Little Eagle <i>Hieraetus morphnoides</i> and ensure avoidance of all existing stick nests, not 'avoided where possible	<i>Pterostylis pedina</i> was not listed as a threatened species at the time the assessment was prepared, or at the time the submission from BCS was provided. The species was provisionally listed as endangered in January 2025. We note the occurrence of <i>Pterostylis pedina</i> in Yanga SCA as described in the updated preliminary determination for this species (December 2025). We also note in the preliminary determination reference to the survey efforts and findings at the Keri Keri Wind Farm for this species (Mark Aitkens in lit, Jan 2025) Extensive surveys were undertaken for candidate threatened species requiring assessment as well as other species, such as <i>Pterostylis pedina</i>. A Project-wide survey was undertaken in September 2024 for this purpose and to further inform the Amended BDAR. This included 520 hours of site-based surveys. <i>Pterostylis pedina</i> was found within the broader Project Area at one location despite it not being a candidate species or listed as threatened at the time of the survey. This finding reflects the directions given to the survey team as outlined above (i.e., search for threatened species and rare species). The survey performed in September 2024 was comprehensive for this species within the Disturbance Footprint. The recorded location <i>Pterostylis pedina</i> has been avoided by the Project, and this species is not within the Disturbance Footprint. These results, including the avoidance of the species has been communicated with the NSW Scientific Committee in response to the preliminary determination published on 5 December 2025. The habitat features at the location where the species was found is vastly different to the habitat observed in the Disturbance Footprint. The species was observed on hard red-brown clay soils with a well-developed cryptogamic crusts, which is not typical of the Disturbance Footprint, which is largely characterised by grey self-mulching soils. The assessment has concluded that this species will not be impacted by the Project. Similarly, extensive surveys for the Plains-wandered (<i>Pedionomus torquatus</i>) were undertaken to inform the BDAR and Amended BDAR. The species was observed within the broader Project area; however, not within the Disturbance Footprint. The Disturbance Footprint does not contain associated PCTs for this species, nor is there Important Habitat Mapping for this species within the Project area. The Little Eagle (<i>Hieraetus morphnoides</i>) was observed within the Disturbance Footprint; however, breeding habitat was not observed/recorded. The Australian Bustard (<i>Ardeotis australis</i>) was not detected in the Project area, despite significant survey effort.	Section 5 of the Amended BDAR – Appendix D of the Amendment Report,
BCS/ NPWS-83	Biodiversity	6.4 migratory and wetland dependent species making up a known 64 species with 43 of them breeding (including colonial nesting species) across the parks (Waugorah Lake, Tarwillie, The Avenue, Piggery, Yanga Creek wetlands and Nimmie–Caira lignum swamps) this includes Pelicans given the breeding ground is to the north in Gayini Nimmie-Caira and large numbers migrate to the area especially to Yanga Lake for foraging.	Migratory and wetland species have been assessed for prescribed impacts in the Amended BDAR.	Section 8.3 of the Amended BDAR - Appendix D of the Amendment Report
BCS/ NPWS-84	Biodiversity	6.5 preparation of the Bird and Bat Management Plan, and project Biodiversity Management Plan includes: a) consultation with NPWS as the adjoining land manager, with a vested interest in the protection of migratory and threatened birds and bats across the Yanga parks. b) consideration of pest animal and weed management strategically, using management strategies delivered in collaboration with NPWS as an adjoining land manager. c) vehicle collision risk, and impact assessment on wildlife in this locality with increased heavy vehicle movements, including night use of the roads for construction purposes. d) ensure biosecurity and hygiene protocols are applied.	A framework Bird and Bat Adaptive Management Plan (BBAMP) has been included with the Amended BDAR. The BBAMP will be finalised, in consultation with CPHR, prior to commencement of operation of the Project.	Appendix A of the Amended BDAR – Appendix D of the Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-85	Telecommunications	Revise the EIS, and Appendix M to ensure: 7.1. recognition that NPWS's current VHF simplex channels and future UHF PSN Trunking services may be indirectly impacted by the project WTG proximity to Yanga SCA. NPWS requests a pathway of adequate reporting and communication if operational issues are detected with NPWS RF links or mobile radio performance post turbine installations, requiring a functional resolution if detection of issues occur.	The Applicant is committed to maintaining the operational performance of any NPWS radio links throughout the operation of the Project. Mitigation measures have been updated to include the establishment of a reporting pathway between the Applicant and NPWS.	Appendix K and Appendix B of the Amendment Report
BCS/ NPWS-86	Aviation	Revise the EIS, and Appendix M to ensure: 8.1 un-certified aerodromes (as helipads) on the parks are considered. Yanga's rotary helipad sites include (a) Bronzewing Drive 34° 26.752' S/143° 48.469' E, and (b) Yanga Homestead 34° 42.91' S/143° 36.576' E. NPWS highlights that temporary aircraft landing facilities, or emergency landing can occur anywhere on Yanga SCA.	The Amended Aviation Impact Assessment (AIA) considers the impact of the Project on aerial operations within the Yanga SCA, including uncertified aerodromes within Yanga SCA. As necessary, mitigation measures have been updated to ensure that emergency landings within the Yanga SCA are not impacted by Project. The AIA proposes operational procedures that can be employed during emergency service operations to reduce risk to aerial operators. The Applicant is committed to developing operational procedures in consultation with aerial operators, including NPWS prior to construction commencing.	Appendix J of the Amendment Report
BCS/ NPWS-87	Aviation	8.2 proximity of the closest WTGs to Yanga SCA boundary must be considered and the resulting impacts to low flight and low visibility based aerial operations for both rotary and fixed wing aircraft addressed in detail. Provide a clear indication of the how aerial operations on Yanga SCA will be impacted/influenced by the WTG placement and indicate what area over Yanga SCA will be influence or restricted in operations as a product of the proposed project.	The Amended AIA assessed potential operations within the Yanga SCA and considered that flight operations within the Yanga SCA would involve flight at or below the tops of WTGs. The Applicant is committed to developing operational procedures in consultation with NPSW to minimise the identified impacts to NPSW and to ensure safe flight practices. This commitment is included in mitigation measures.	Appendix B and Appendix J of the Amendment Report
BCS/ NPWS-88	Aviation	8.3 NPWS is included in the AIA as part of the 'Aerial Firefighting' (fixed and rotary) and add 'Other Aerial Operations' aerial pest management (rotary), Waterbird monitoring (fixed wing), Pest monitoring (Fixed & rotary), with recognition of the restrictions and likely impacts on these operations that will affect Yanga SCA.	The Amended AIA includes an updated assessment of the potential impacts to aerial firefighting that may result from the Project, and how these will be managed to minimise any impacts.	Appendix J of the Amendment Report
BCS/ NPWS-89	Aviation	8.4 wind monitoring towers (WMTs) constructed prior to the WTGs will need to be appropriately lit and marked to ensure they are visible to aircraft in accordance with NASF Guideline D and MOS 139 Section 8.110 / 9.30. The details of the WMTs are to be reported to NPWS prior to commencement of installation. Notably four (4) temporary and four (4) permanent WMTs will be installed with a maximum height of 159 m AGL with elevation for at the highest WMT as 69.49 m above mean seal level (AMSL), with an overall height of 228.49 m AMSL (749.6 ft AMSL).	Hazard lighting and marking was assessment for the WMTs in Section 7 of the AIA (refer Appendix L of the EIS). The AIA recommended that the WMTs are marked with red/white/red bands as per the NASF Guideline D, and that any WMTs that are constructed prior to the WTGs (temporary WMTs) and the permanent WMTs that are not located in proximity to any WTGs should have obstacle lighting installed. The Amended AIA considers the amended Project layout and has been updated to reflect the outcomes of the assessment.	Appendix J of the EIS. Appendix L of the Amendment Report
BCS/ NPWS-90	Aviation	8.5 safety risk assessments are revised base on the additional information affecting Yanga SCA/ NPWS operations and provide a conclusion on the WTGs and WMTs, address need for obstacle lighting in the maintenance of acceptable levels of safety for NPWS aerial operations (low flight and low visibility).	The Amended AIA assessed the risk that the Project poses to the Yanga SCA. Updated mitigation measures have been included within Appendix B of the Amendment Report.	Appendix J and Appendix B of the Amendment Report
BCS/ NPWS-91	Bushfire	9.1 In the preparation of the Bush fire Emergency Management and Operations Plan, ensure: (a) consultation with NPWS and consideration of the Murrumbidgee Valley National Park Yanga Precinct Fire Management <i>Strategy (OEH, 2014)</i> .	A Bushfire and Emergency Management and Operations Plan will be prepared by the Applicant prior to the construction of the Project. The Applicant is committed to consulting with NPWS during the development of this Plan and will consider the Murrumbidgee Valley National Park Yanga Precinct Fire Management Strategy (OEH, 2014).	Appendix B of the Amendment Report
BCS/ NPWS-92	Bushfire	(b) no operational restrictions or closure (temporary or otherwise) occurs to NPWS fire trail network on Yanga SCA, this includes immediate egress to Keri Keri Road or the Sturt Highway.	Noted. The Applicant is committed to ensuring that during the detailed design phase of the Project fire trails to Yanga SCA are not restricted. The proposed road upgrades aim to support more options to evacuate within the local area and the Applicant is committed to design to complement the existing strategies within the Yanga SCA (refer Appendix N of the EIS).	This table Appendix N of the EIS

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-93	Bushfire	(c) ignition risk and mitigation measures associated with the project construction and operation is adequately recognised and mitigated with provision of sufficient on-site water supply and adequate defendable space.	The Bushfire Risk Assessment (Appendix N) of the EIS addresses the requirement for on-site water supply and defendable space around infrastructure. Asset protection zones within the Project currently exceed the minimum asset protection zone required to comply with Section 8.3.5 of Planning for Bushfire Protection 2019 (refer Section 6.1 of Appendix N of the EIS). Water supply for the project will be finalised in consultation with NSW RFS, but will include a minimum of 50,000L static water tanks that are supplied by truck.	Appendix N of the EIS
BCS/ NPWS-94	Bushfire	(d) fire preparedness and response is addressed in consultation with NPWS Lower Daring Area, and NPWS staff are included in the emergency response scenario & training drills.	Noted. The Applicant is committed to consulting with NPWS during the preparation and execution of emergency response training. This has been included in the updated mitigation measures in Appendix B.	Appendix B of the Amendment Report
BCS/ NPWS-95	Bushfire	(e) NPWS Lower Daring Area is included in the emergency response, and notification processes under the plan, where incidents are likely to affect Yanga SCA, or the other parks. i. notification directed to NPWS Manager, Lower Darling Area via npws.lowerdarling@environment.nsw.gov.au or 03 5021 8941 ii. emergency response directed to NPWS Park Operations West Branch Duty Officer via Ph: 02 8275 1740.	Noted. Relevant contacts will be included in the Bushfire and Emergency Management Plan. The Applicant will consult with NPSW during the development of the Plan to confirm reporting protocols.	Appendix B of the Amendment Report
BCS/ NPWS-96	Water and Soils	Revise the EIS, and Appendix T to ensure: 10.1 adequate consideration of, and assessment of impacts to waterways, wetlands and linked hydrology of the development site to the Lowbidgee Floodplain. Noting that the wetlands on Yanga SCA are listed in the Directory of Important Wetlands in Australia.	Noted. A Soil and Water Management Plan (SWMP) will be prepared and implemented prior to the commencement of construction of the Project.	This table.
BCS/ NPWS-97	Water and Soils	10.2 water extraction which involves Abercrombie Creek must be confirmed, and the EIS recognise the water supply infrastructure required for delivery.	Section 6.8.3.2 notes that the preferred water supply to the Project is throughout groundwater extraction, however, this will be confirmed during the detailed design phase of the Project. The Project does not propose to extract water from Abercrombie Creek.	Section 6.8.3.2 of the EIS
BCS/ NPWS-98	Water and Soils	10.3 water supply needs for the project must be adequately addressed. Confirm if water access to the Abercrombie West Pipeline is likely, as this extracts stock & domestic water from the existing Murrumbidgee River extraction point at the Yanga Woolshed on Yanga SCA. NPWS is a member of the pipeline group.	Refer to response BCS/NPWS-97. The preferred water extraction for the Project is through groundwater extraction. The Applicant does not propose to extract water from the Abercrombie West Pipeline.	Section 6.8.3.2 of the EIS
BCS/ NPWS-99	Water and Soils	10.4 figures currently provided incorrectly identify the Abercrombie West Stock & Domestic Pipeline, which was installed in 2019, current information depicts the now obsolete Abercrombie Chanel system, ensure this is corrected.	Noted. Figures have been updated.	Figure 1-1 and Figure 1-3 of the Amendment Report
BCS/ NPWS-100	Water and Soils	10.5 maintenance of fish passage in Abercrombie Creek which is ephemeral and rarely flows but its importance needs to be acknowledged as part of the EIS and flows protected.	Noted. Fish passage in Abercrombie Creek will be maintained as per the requirements of the Fisheries Management Act 1994 and the Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013).	This table.
BCS/ NPWS-101	Water and Soils	Revise the EIS, and Appendix T to ensure: 11.1 dust is managed, and the CSWMP is linked to the proposed Air Quality and Dust Management Plan when considering Yanga SCA and the issues arising from use of Keri Keri Road. Preventative and management measures need to be applied to mitigate dust impacts, to protect threatened plants on Yanga SCA and prevent smothering. Installation of a dust deposition gauge to monitor dust emissions likely to affect Yanga SCA as per the <i>Approved Methods and Guidelines for the Modelling and Assessment of Air Pollutants in New South Wales (NSW EPA, 2022)</i> is advised.	Noted. The Applicant will install of a dust deposition gauge to monitor dust emissions that may impact the Yanga SCA. The Applicant will develop a CEMP that contains relevant sub-plans, including a Soil and Water Management Plan (SWMP), which will link to the Air Quality and Dust Management Plan. Dust suppression will be outlined in the relevant management plans.	Appendix B of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
BCS/ NPWS-102	Water and Soils	11.2 diversion banks as proposed consider hydrological data for the site and the floodplain, apply adequate design standards limiting the adverse effect on, or deviation of important water flows to waterways, wetlands or modify delivery of water feeding into important riverine habitats.	Noted. The detailed design will be informed by hydraulic and hydrological modelling to ensure that adverse effects of deviation of natural waterways are avoided or minimised. A Soil and Water Management Plan, including Erosion and Sediment Control Plan, will be prepared and implemented prior to the commencement of construction of the Project to avoid or minimise impacts to waterways.	This table. Appendix B of the Amendment Report.
BCS/ NPWS-103	Water and Soils	11.3 water attributed to de-watering actions on the project development site, or discharge of collected or directed run-off is not to affect natural waterways or Yanga SCA. All discharge is to be adequately treated, with low volumes of water discharged through vegetated areas to encourage infiltration and settlement of entrained sediment. This includes discharge associated from Keri Keri Road.	A Soil and Water Management Plan, including Erosion and Sediment Control Plan, will be prepared and implemented prior to the commencement of construction of the Project to avoid or minimise impacts to waterways.	This table.
BCS/ NPWS-104	Water and Soils	11.4 erosion and sediment control plan (ESCP) is prepared for Keri Keri Road, with suitable measures applied to effectively mitigate impacts to Yanga SCA. Measures are to limit discharge of sediment laden runoff on to Yanga SCA, propose sediment controls (e.g., sumps and/or sediment basins) to protect water quality, ensure any discharge is at a low, non-erosive velocity.	Noted. A Soil and Water Management Plan, including Erosion and Sediment Control Plan, will be prepared and implemented prior to the commencement of construction of the Project to avoid or minimise impacts to waterways.	Appendix B of the Amendment Report
BCS/NPWS Attachment D (AD)				
BCS/ NPWS-105	Biodiversity	The EIS/BDAR must include: 1. Descriptions and maps of the operational and construction footprints of the project that relate to MNES. 2. Descriptions and maps of staging and timing of the action that may impact on MNES. 3. Maps of the subject land boundary showing the final proposal and Disturbance Footprint with regards to MNES. 4. GIS shapefiles of all maps that relate to MNES.	Potential impacts to MNES, including figures where relevant are included in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report
BCS/ NPWS-106	Biodiversity	2. Ensure that the 'Establishing the site context' of BAM 2020 (Section 3) have been fully met in the BDAR in relation to MNES.	Noted.	Appendix D of the Amendment Report.
BCS/ NPWS-107	Biodiversity	3. The EIS/BDAR must: 1. Demonstrate that field-based survey effort meets the required survey guidelines and, where available, Commonwealth survey guidelines	Noted.	Appendix D of the Amendment Report.
BCS/ NPWS-108	Biodiversity	2. Demonstrate supporting databases have been accessed and used (e.g. NSW BioNet Vegetation Classification, NSW BioNet Threatened Biodiversity Data Collection, NSW BioNet Atlas, Commonwealth Species Profile and Threats Database search results)	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 1.4 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-109	Biodiversity	3. Demonstrate published peer-reviewed literature have been accessed and used	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 11 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-110	Biodiversity	4. Demonstration local data (if relevant) has been accessed and used	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 1.4 of the Amended BDAR – Appendix D of the Amendment Report.
BCS/ NPWS-111	Biodiversity	5. Demonstrate all EPBC Act-listed threatened species and communities have been appropriately mapped in accordance with the relevant Commonwealth listing advice	Potential impacts to MNES, including figures where relevant were included in the BDAR and have been updated, as necessary, in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed												
BCS/ NPWS-112	Biodiversity	6. Demonstrate that important populations and critical habitat has been considered, as defined in Approved Listing Advice, Approved Conservation Advice and Recovery Action Plans	All important populations and critical habitat have been considered. No species with Important Habitat Mapping have required to be assessed for the Subject Land.	Section 8 of the Amended BDAR – Appendix D of the Amendment Report.												
BCS/ NPWS-113	Biodiversity	7. Include a list of all EPBC Act listed threatened species and communities that occur on the subject land, or in the vicinity (including species that are ‘ecosystem credits’ in BAM)	Potential impacts to MNES, including figures where relevant are included in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report												
BCS/ NPWS-114	Biodiversity	8. Include a discussion, with data and analysis where any species and communities identified by the DCCEEW referral documents have been ruled out as occurring on or near the subject site.	Potential impacts to MNES, including figures where relevant were included in the BDAR and have been updated, as necessary, in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report												
BCS/ NPWS-115	Biodiversity	4. Avoidance, minimisation, mitigation and management The EIS/BDAR must: 1. Demonstrate that all feasible alternatives and efforts to avoid and minimise impacts on EPBC Act listed threatened species and communities (including direct, indirect and prescribed impacts) including an analysis of alternative: a. designs and engineering solutions b. modes or technologies c. routes and locations of facilities d. sites within the subject site e. the identification of any other site constraints in determining the location and design of the proposal (such as bushfire protection requirements, flood planning levels, servicing constraints, etc).	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 7 of the Amended BDAR – Appendix D of the Amendment Report.												
BCS/ NPWS-116	Biodiversity	2. Discuss and justify all feasible measures to avoid, mitigate and/or manage impacts on EPBC Act listed threatened species and communities (including direct, indirect and prescribed impacts) including: a. techniques, timing, frequency and responsibility b. identify measures for which there is risk of failure c. evaluate the risk and consequence of any residual impacts d. any adaptive management strategy proposed to monitor and respond to impacts.	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 7 and Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.												
BCS/ NPWS-117	Biodiversity	5. Impact assessment The EIS/BDAR must: 1. Identify the residual adverse impacts likely to occur to each EPBC Act listed threatened species and/or community after the proposed avoidance and mitigation measures are considered	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.												
BCS/ NPWS-118	Biodiversity	2. Justify and provide evidence for the predicted level of impact, with reference to the Commonwealth’s ‘Significant Impact Guidelines 1.1 - Matters of National Environmental Significance’11 and DPIE’s ‘Guidance to Assist a Decision- Maker to Determine a Serious and Irreversible Impact’	‘Significant Impact Guidelines 1.1 – Matters of National Environmental Significance’ was used to determine the level of potential impact to MNES.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.												
BCS/ NPWS-119	Biodiversity	3. Provide a summary table with the following information: <table><tr><th>Name of EPBC Act listed entity</th><th>Nature & consequence of impact (direct & indirect)</th><th>Duration of impact (e.g. construction, operation, life of project)</th><th>Quantum of impact</th><th>Consequence of impact (local, state & national scales)</th><th>Impact requires offsetting? (significant or not)</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>	Name of EPBC Act listed entity	Nature & consequence of impact (direct & indirect)	Duration of impact (e.g. construction, operation, life of project)	Quantum of impact	Consequence of impact (local, state & national scales)	Impact requires offsetting? (significant or not)							Summary table has been included in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.
Name of EPBC Act listed entity	Nature & consequence of impact (direct & indirect)	Duration of impact (e.g. construction, operation, life of project)	Quantum of impact	Consequence of impact (local, state & national scales)	Impact requires offsetting? (significant or not)											
BCS/ NPWS-120	Biodiversity	4. Provide data and justification where any EPBC Act-listed threatened species or communities to be considered in the BDAR are considered to be at low risk of impact during the assessment.	Noted.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.												

Ref No.	Theme	Submission	Response	Where Addressed																		
BCS/ NPWS-121	Biodiversity	6. Offsets The EIS/BDAR must: 1. Identify any MNES that have not been offset using the BAM	All MNES for which impacts have generated offsets have been considered.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.																		
BCS/ NPWS-122	Biodiversity	2. Include details of how impacts requiring offset correlate to the MNES impacts																				
BCS/ NPWS-123	Biodiversity	3. Include details of the PCTs that require offsetting and the number and type of ecosystem credits required for impacts to MNES	Vegetation mapping has been updated to consider the amended Project, informed by additional survey effort (BAM plots and transects). None of the PCTs are associated with any TECs that are MNES.	Section 8.1 of the Amended BDAR = Appendix D of the Amendment Report																		
BCS/ NPWS-124	Biodiversity	4. Include details of threatened species requiring offset and the number of species credits required for impacts to MNES	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 10 of the Amended BDAR – Appendix D of the Amendment Report																		
BCS/ NPWS-125	Biodiversity	5. Demonstrate the correct uses the BAM (and BAM-C) to identify the number and class of biodiversity credits that need to be offset to achieve a standard of ‘no net loss’ of biodiversity	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 1, Section 2.2 of the Amended BDAR – Appendix D of the Amendment Report.																		
BCS/ NPWS-126	Biodiversity	6. Detail the ecological rehabilitation and/or biodiversity conservation actions proposed for offsetting	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 10 of the Amended BDAR – Appendix D of the Amendment Report																		
BCS/ NPWS-127	Biodiversity	7. Identify any other offsetting approach proposed, such as land-based offsets, retiring credits by payment into the Biodiversity Conservation Fund and/or through supplementary measures	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 10 of the Amended BDAR – Appendix D of the Amendment Report																		
BCS/ NPWS-128	Biodiversity	8. Provide a summary table with the following information: <table><tr><th>Threatened Species / Community listed under EPBC Act</th><th>PCTs associated with the ecosystem credit species / ecological community (if applicable)</th><th>Area of Impact (ha)</th><th>Credits Required</th><th>Offsetting Approach</th><th>Reference (EIS/BDA R)</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>TOTAL</td><td></td><td></td><td></td><td></td><td></td></tr></table>	Threatened Species / Community listed under EPBC Act	PCTs associated with the ecosystem credit species / ecological community (if applicable)	Area of Impact (ha)	Credits Required	Offsetting Approach	Reference (EIS/BDA R)							TOTAL						Summary table has been included in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.
Threatened Species / Community listed under EPBC Act	PCTs associated with the ecosystem credit species / ecological community (if applicable)	Area of Impact (ha)	Credits Required	Offsetting Approach	Reference (EIS/BDA R)																	
TOTAL																						
BCS/ NPWS-129	Biodiversity	7. Other considerations The EIS/BDAR must: 1. Demonstrate that all relevant Commonwealth guidelines and policy statements that are applicable to the action and listed threatened species and/or communities have been considered, including but not limited to: a. International environmental obligations b. Recovery Plans c. Approved Conservation Advice d. Threat Abatement Plans	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section a, Section 2 of the Amended BDAR – Appendix D of the Amendment Report.																		
BCS/ NPWS-130	Biodiversity	2. Include an assessment for each EPBC Act listed threatened species and/or community, that has been adequately informed by applicable Commonwealth guidelines and/or policy statements. For example, the interaction between the proposed action and important populations or critical habitat identified in policy documents and/or the interaction between the proposed action and threatening processes or recommended conservation actions outlined in Commonwealth policies and plans.	This was included in the BDAR and has been updated, as necessary, in the Amended BDAR.	Section 9.2.3 of the Amended BDAR – Appendix D of the Amendment Report.																		

4.2 TFNSW

TABLE 4-2 TRANSPORT FOR NSW (TFNSW)

Ref No.	Theme	Submission	Response	Where Addressed
TfNSW - 01	Traffic (generation)	1. The existing project traffic volumes in the TIA only represent the light vehicles and not all the project traffic volume and vehicle types. The TIA and turn warrant assessment (see Figure 3.25 of AGTM Part 6) must be revised to account for all construction traffic volumes and vehicle types for each public and private access to the state road network. The revised turn warrants assessment is required to: - Apply AM/PM construction traffic volumes (with a ratio of light and heavy vehicles and turning volumes) for the worst-case scenario at each public and private connection - Include background traffic volumes measured at AM/PM network peaks, annual growth rates applied linearly to peak construction and accumulative traffic volumes for project AM/PM peak traffic hours (for overlapping period) of any significant projects (at EIS stage or approved). - Include input for turn warrant assessment(s) (i.e. project traffic, turning and background traffic volumes, growth rates, and accumulative traffic volumes). Data must be plotted on turn warrant nominal graphs for each public and private access to the state road network.	The Amended Traffic and Transport Impact Assessment (TTIA) includes assessment for all construction vehicle traffic volumes and vehicle types for each public and private access to the state road network. The Amended TTIA also includes the turn warrants assessments requested by TfNSW: - 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.	Section of the Amended TTIA – Appendix I of the Amendment Report.
TfNSW – 02	Traffic (generation)	2. Assess Safe Intersection Sight Distance (SISD) at each existing public and private road intersection with project related new and existing accesses to the state road network. Measures required to achieve SISD are to be provided.	The Amended TTIA includes a SISD assessment for the site access intersections with the state road network (and local road), namely: - Sturt Highway / Keri Keri Rd / Loorica Rd intersection - Sturt Hwy / Site access (east of Keri Keri Rd) - Keri Keri Road / Site Access	Section of the Amended TTIA – Appendix I of the Amendment Report.
TfNSW – 03	Traffic (generation)	3. The TIA states traffic surveys were undertaken at the intersection of Keri Keri Road and Sturt Highway between 18 and 21 September 2022. The raw data collected for the traffic counts has yet to be provided as a part of the TIA. TfNSW requires the underpinning raw data collected in the September 2022 traffic survey for Keri Keri Road/Sturt Highway intersection to be provided as an appendix to the revised TIA.	Additional details of 2022 survey data is provided in the Updated TTIA. Reference is also made in the Updated TTIA to more recent traffic survey data obtained by Amber Organisation and utilised in the adjacent Baldon Wind Farm TTIA.	Section 2.5 and Appendix A of the Amended TTIA – Appendix I of the Amendment Report
TfNSW – 06	Traffic (generation)	4. The TIA must be updated to identify the design vehicle (largest heavy and OSOM vehicles) accessing each public and private connection to the state road network.	The Amended TTIA has considered the design vehicle requirements for both OSOM and non-OSOM construction vehicles. Intersection concept designs have also been prepared to demonstrate the intersection design requirements.	Section 5.4 and Appendix E of the Amended TTIA – Appendix I of the Amendment Report
TfNSW – 07	Traffic (generation)	5. The TIA states 38 OSOM vehicle trips will occur per day during peak of construction. The TIA must identify proportion of OSOM movements attributed to high and low risk OSOM vehicles able to travel under notice under the NSW Class 1 Load Carrying Vehicle Operator's Guide.	The Amended TTIA and Rex J Andrews Engineered Transportation OSOM Route Assessment provides details regarding the movement of OSOM vehicles to the Project. The number of weekly OSOM vehicle trips to the site has been reduced from 38 to 34 trips, reflecting the reduced number of WTGs. The number of daily trips by OSOM vehicles for the Amended project is estimated to be 7 trips per day.	Section 3.3, Section 4.2.2, Section 5.5 and Appendix B of the Amended TTIA – Appendix I of the Amendment Report.
TfNSW – 08	Traffic (generation)	6. The TIA must be revised to clearly distinguish light and heavy vehicle routes for all project stages and connections to the state road network.	The Amended TIA has specified the light and heavy vehicle state road network routes.	Section of the Amended TTIA – Appendix I of the Amendment Report.
TfNSW – 09	Workforce Accommodation	7. Identify timing and sequencing of workforce accommodation camp construction.	Construction of the Workforce Accommodation Camp will commence in the initial month of construction, after the site access and internal access tracks have been constructed. The camp will be progressively constructed commensurate with workforce numbers. The camp will be used throughout the construction period and decommissioned once the Project is commissioned and operational.	This table.

Ref No.	Theme	Submission	Response	Where Addressed
TfNSW – 10	Workforce Accommodation	8. Identify traffic generation (and vehicle types) for workforce accommodation camp construction during AM/PM peaks	The Amended TTIA provides details regarding the workforce accommodation rosters, shifts and mode share along with traffic generation for AM and PM peaks during peak construction.	Section 4.2 of the Amended TTIA - Appendix I of the Amendment Report
TfNSW – 11	Workforce Accommodation	9. Provide a turn warrant assessment for the worst-case scenario of workforce accommodation camp construction and post-completion (entire operation).	The Amended TTIA includes: • A turn warrant assessment for construction and operation of the workforce accommodation camp; • Assessment of traffic volumes for pre-construction work that will run concurrently with the construction of the workforce accommodation camp; and • Updated operational traffic assessment to consider requirements for servicing of workforce accommodation camp.	Section of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 12	Workforce Accommodation	10. Identify traffic volumes required for pre-construction work that will occur in parallel.		Section of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 13	Workforce Accommodation	11. Assess operational traffic volumes for servicing accommodation camps, vehicle types, and AM/PM peak hour changes for traffic generation at each intersection with the state road network along construction transport routes.		
TfNSW – 14	Transport Route	12. Provide within the updated route study further assessment of roundabout intersections identified on the Sturt Highway (Figures 22, 23 and 24 within the TIA) addressing the following: - Clarification on whether a portion of roundabouts will be removed or if it is proposed to mount existing annulus(s). - Swept paths and road design plans to confirm impacts on the roundabout(s). - Identify any vegetation removal or trimming required. - Any other infrastructure required to be removed or modified.	The transport route assessment has been updated to include swept path diagrams for roundabout intersections on the Sturt Highway that require upgrades. This includes the proposed mechanism for OSOM to clear the intersection, swept path analysis and strategic road design plans, details of vegetation clearing and/or infrastructure required to be removed.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 15	Transport Route	13. The removal of traffic islands at the Gillenbah Road/Sturt Highway (Figure 27 of route assessment) pinch point to facilitate the high-risk OSOM movements will conflict with the service centre conditions and infrastructure to prohibit right turns into Gillenbah Road. Alternative designs to navigate this pinch point without impacting on service centre consent conditions are required to be investigated and included within a revised route assessment (accompanied by swept paths and strategic designs).	The transport route assessment has been updated to assess changes to the Project design and wind turbine specifications since the exhibition of the EIS. The Applicant has also removed the Port of Newcastle transport route option and, therefore, leaving only the transport route from the Port of Adelaide. This route enters NSW near Euston. As such, impacts to the Gillenbah Road/Sturt Highway intersection have been avoided.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 16	Transport Route	14. Timing of high-risk OSOM deliveries within the construction schedule, indicative weekly program(s), and timeframe to complete deliveries from relevant port to the site is required.	The transport route assessment has been updated to include timing of high-risk OSOM movements, an indicative weekly delivery program, and the timeframe to complete deliveries from port to site.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 17	Transport Route	15. Route 2 will require loads to traverse Denman Bridge from Port of Newcastle. The Denman Bridge has a height limit of 5.6m. For loads higher than 5.6 m, the Wybong and Bengalla Road detour will be required. The route assessment must assess OSOM vehicles required to travel Wybong and Bengalla Roads and upgrades or other mitigation measures for each pinch point along this route. Note: Wybong and Bengalla are currently being reclassified as state roads.	The Applicant has removed the option to use the Port of Newcastle and, therefore, will no longer be using the transport route from the Port of Newcastle.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 18	Transport Route	16. Provide correct units of measurement for rotor diameter, as the rotor diameter is currently measured using squared metres as a unit of measurement.	Noted. Units of measurement for rotor diameter have been corrected.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 19	Transport Route	17. Strategic concept designs are required to be provided for each pinch point requiring road upgrades or modifications to the State road network.	Noted. The transport route assessment has been updated to include strategic concept designs for each area of the state road network that requires upgrades or modifications.	Section 5.4 and Appendix B of the Amended TTIA - Appendix I of the Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
TfNSW – 20	Transport Route	18. Dimensions of swept paths and parking plans must be provided for each pullover, layby, and rest area on OSOM routes, demonstrating applicable high-risk OSOMs can physically be accommodated and mitigate impacts to other road users. <i>Note: Locations and identification of OSOM design vehicle will be used to access each pullover, including rest areas.</i>	Noted. The transport route assessment has been updated to include swept paths and parking plans for each pullover bay, layby and rest area on the OSOM route. The information demonstrates that high-risk OSOM can be accommodated without impacts to other road users.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 21	Transport Route	19. The route assessment must include mitigation measures to manage impacts to other road users, including OSOM movements travelling in the opposite direction and road users travelling behind high-risk OSOM vehicle(s).	High-level mitigation measures have been included; however, the detail of managing impacts to other road users will be provided in a Traffic and Transport Management Plan (TTMP). The requirements of the TTMP are specified in the Updated TIA and will be included in the Conditions of Consent for the Project.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report
TfNSW – 22	Transport Route	20. The RJA route assessment and Traffic Impact Assessment (TIA) is contingent upon road upgrades provided by EnergyCo from Port of Newcastle to Elong Elong. The applicant must review pavement extents and scope of works to ensure vehicle configurations and swept paths for this project's higher-risk OSOM align with the scope of the P2R project, particularly relocation of traffic signals at George Street, Industrial Drive and Mayfield Road intersection. Evidence of the assessment of consistency with P2R project is required as a part of the revised route study.	The Applicant has removed the option to use the Port of Newcastle and, therefore, will no longer be using the transport route from the Port of Newcastle.	This table. Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW - 23	Transport Route	21. The RJA route study does not include relevant TfNSW projects on the state road network. The route study must be updated to include TfNSW projects that have commenced or have been completed and mitigation measures to navigate any identified pinch points. The Hexham Straight is a notable project impacting Route 2 and the route assessment must be updated to assess the alternative route via Newcastle Inner City Bypass to Newcastle Road, for high-risk OSOM loads that do not exceed the vertical clearance limitations. A bridge and culvert assessments are to be completed for all bridge and culvert structures along each OSOM Route identified within the RJA route study. The proponent can request a bridge and culvert assessment to be undertaken by TfNSW Freight Operations at spu@transport.nsw.gov.au	The Applicant has removed the option to use the Port of Newcastle and, therefore, will no longer be using the transport route from the Port of Newcastle. Relevant TfNSW projects on the state road network for the 2 proposed transport routes from the NSW border to the Project area have been included in the updated transport route assessment.	This table. Appendix B of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 24	Strategic Designs	22. Strategic designs must be accompanied by swept paths for the largest vehicle required to access each public and private access with the state road network. Swept paths must demonstrate the largest heavy vehicle can turn concurrently in all turn directions without crossing into the incorrect lane, well within proposed/existing pavement and within existing intersection treatments (where applicable). Intersection upgrades are to be in accordance with Austroads and relevant TfNSW supplements.	Noted. The transport route assessment and updated TTIA include strategic designs with swept paths for the largest design vehicle for each public and private access with the state road network. All upgrades required will be in accordance with Austroads and relevant TfNSW supplements.	Section 5.4 and Appendix E of the Amended TTIA - Appendix I of the Amendment Report.
TfNSW – 25	Strategic Designs	23. Strategic designs must identify any acquisition required to facilitate the scope of road upgrades and road works inclusive of pinch points. The Developer is responsible for dedication and acquisition of land, if necessary, to accommodate road infrastructure, including but not limited to footways, structures, stormwater drainage, batters, maintenance access, and utilities, to TfNSW's satisfaction. Note: The design must comply with TfNSW strategic design requirements for DAs, TfNSW technical directions, supplements, corridor strategies, Austroads, and any other applicable TfNSW policies/strategies. To assist in preparing the designs, please refer to the link below: https://roads-waterways.transport.nsw.gov.au/business-industry/partners-suppliers/documents/planning-principles/strategic-design-fact-sheet-02-2022.pdf	Strategic designs have been provided for road upgrades required to facilitate the transport of Project components to the Project site. Acquisitions are not required to facilitate the scope of road upgrades required; however, landowner permission will be required for the turn from Sturt Highway (Market Street) to Sturt Highway in Balranald.	This table. Section 5.4 and Appendix E of the Amended TTIA - Appendix I of the Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
TfNSW – 26	Interaction with the rail network	24. A heavy vehicle application will need to be made for Level Crossings and Bridges that fall within the Country Regional Network to avoid damage to any rail infrastructure. Upon receipt of the NHVR route planner ID and application number, the UGL heavy vehicle team will complete a review of the route to assess Level Crossings and Bridges on the network for suitability according to OSOM requirements. The heavy vehicle team can be contacted by email at heavyvehicle@uglregionallinx.com.au for any further information or assessment.	Noted.	This table
TfNSW – 27	Rail	25. A further detailed assessment is to be provided to TfNSW at the rail underpass on Sturt Highway at Wagga Wagga before any further consideration of the proposed route. This is required as the clearances of the underpass may impact the viability of the transport route for blade components.	The Applicant has removed the option to use the Port of Newcastle and, therefore, will no longer be using the transport route from the Port of Newcastle.	Appendix B of the Amended TTIA - Appendix I of the Amendment Report

4.3 NSW ENVIRONMENT PROTECTION AUTHORITY (EPA)

TABLE 4-3 NSW EPA

Ref No.	Theme	Submission	Response	Where Addressed
EPA-01	Licencing	Based on the information provided, if the proposal is granted development consent the premises will require an Environment Protection Licence (EPL) for (a) ‘electricity generation’ and (b) ‘crushing, grinding or separating’ activities pursuant to clause 17 and clause 16 of Schedule 1 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act), respectively.	Noted. The Applicant will apply for an EPL for electricity generation and crushing, grinding or separating activities, as required, prior to commencing construction of the Project.	This table
The EPA recommends the following conditions be considered should development consent be granted for the proposal:				
EPA-02	Noise	1. The Proponent must prepare a revised noise and vibration impact assessment, for the final chosen wind turbine generator model and layout, prior to installation of the wind turbine generators. The revised noise and vibration assessment must demonstrate, through appropriate modelling and in accordance with the ‘ <i>Wind Energy: Noise Assessment Bulletin – For State significant wind energy development</i> (DPE/EPA, 2016)’, that the final wind turbine generator models and layout can meet the limits developed consistent with the ‘ <i>Wind Energy: Noise Assessment Bulletin – For State significant wind energy development</i> (DPE/EPA, 2016)’. The details of any ‘curtailment’ or requirements for wind turbine generators to operate in low noise mode (if required) must be fully presented in the revised noise and vibration impact assessment.	Noted.	This table
EPA-04	Noise	2. Prior to commissioning of the turbines, the Proponent must prepare and implement a Noise Management Plan to manage noise emissions from the operation of the project. The Plan must include, but not necessarily be limited to: a) compliance monitoring within one year of commissioning, in accordance with the ‘ <i>Wind Energy: Noise Assessment Bulletin – For State significant wind energy development</i> (DPE/EPA, 2016)’ procedures to certify noise; b) identification and implementation of best practice management techniques for minimisation of noise emissions where reasonable and feasible; c) if required, measures to be undertaken to rectify annoying characteristics resulting from the operation of the project such as excessive low frequency noise, excessive tonality or adverse mechanical noise from component failure; and d) if required, procedures and corrective actions to be undertaken if non-compliance is detected.	Noted.	This table
EPA-05	Noise	3. Noise generated from ancillary plant and equipment (e.g., electrical compound(s), substation(s), BESS and transmission lines) must not exceed a level of Leq,15minutes 35dB(A) at any residence not associated with the development.	Noted.	This table

Ref No.	Theme	Submission	Response	Where Addressed
EPA-06	Noise	4. The Proponent must submit a revised noise impact assessment, before construction commences, to the Planning Secretary for approval based on detailed design and final turbine selection demonstrating that the criteria in the Planning Bulletin can be met.	Noted.	This table
EPA-07	Noise	5. All construction works at the premises must be conducted between 7am and 6pm Monday to Friday and between 8am and 1pm Saturdays and at no times on Sundays and public holidays.	Noted.	This table
EPA-08	Noise	6. Exceptions to construction hours – the following activities may be carried out outside the recommended construction hours: a) construction that causes LAeq(15minute) noise levels that are i. no more than 5dB above 'Rating Background Level' at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and ii. no more than the 'Noise Management Levels' specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive land uses; or b) for the delivery of materials required by the police or other authorities for safety reasons; or c) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or d) as approved through the process outlined in "Variation of construction hours" of this approval.	Noted.	This table
EPA-09	Noise	Variation of construction hours – the hours of construction activities specified under "Exceptions to construction hours" of this approval may be varied with the prior written approval of the Secretary. Any request to alter the hours of construction shall be: a) considered on a case-by-case or activity-specific basis; b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; c) accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of relevant Council(s) (and other relevant agencies) has been and will be undertaken; d) all feasible and reasonable noise mitigation measures have been put in place; and e) accompanied by a noise impact assessment consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECCW, 2009).	Noted.	This table
EPA-10	Noise	8. All feasible and reasonable noise mitigation measures be applied for construction activities to seek to achieve the 'Noise Management Levels' (NML) outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009).	Noted.	This table
EPA-11	Noise	9. The proponent must prepare a Construction Noise and Vibration Management Plan for approval by the Secretary that describes how construction noise impacts will be minimised to the extent practicable. The plan should include a noise impact assessment that identifies and assesses noise impacts from the proposed location of construction compounds, internal haul roads, wind turbine generators [construction sites], concrete batching plants and mobile crushing and screening plants and the feasible and reasonable noise mitigation measures that will be applied to reduce construction noise impacts to the extent practicable.	Noted.	This table
EPA-12	Noise and Vibration	10. If blasting is required for any reason during the construction or operational stage of the proposed development, blast impacts are to comply with the guidelines and criteria contained in ' <i>Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration</i> ' (ANZEC, 1990).	Noted.	This table

4.4 HERITAGE NSW

TABLE 4-4 HERITAGE NSW

Ref No.	Theme	Submission	Response	Where Addressed
HNSW-01	Cultural Heritage	1. Heritage NSW requires additional documentation in relation to the consultation process. The applicant needs to provide evidence that consultation was undertaken regarding the Project Methodology and Draft ACHAR (such as an email with all relevant email addresses shown) and provide the responses from the Registered Aboriginal Parties (RAPs).	All additional consultation evidence has been provided in the Amended ACHAR. This includes specific heritage assessment consultation undertaken by ERM and any other relevant Aboriginal community consultation undertaken by Acciona.	Appendix E of Amendment Report.
HNSW-02	Cultural Heritage	2. Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is dated 1 March 2023 and therefore was greater than 12 months old at the time of submission. Heritage NSW requires, as per Requirement 1b of the Code of Practice, that AHIMS searches are contemporaneous with the project. We consider that AHIMS searches of over 12 months old need to be updated. Please an updated the AHIMS search. Heritage NSW also notes that additional sites and Potential Archaeological Deposits (PADs) identified as a part of the Project Energy Connect (Eastern) Project (which overlaps with the current project area), were uploaded to AHIMS in December 2023. Any newly recorded sites will need to be considered within the ACHAR. Please update the ACHAR to consider these additional sites.	An updated AHIMS Search has been completed to inform the Amended ACHAR. Any additional sites and/or Potential Archaeological Deposits (PADs) identified as a part of Project EnergyConnect (Eastern) or any other recent project have, where relevant, been provided in the Amended ACHAR (including updated Impact Assessment and Recommendations). While Project EnergyConnect (Eastern) does overlap with the Project area, it does not intercept with the Disturbance Footprint and, therefore, impacts to AHIMS registered by the Proponent for Project EnergyConnect are not anticipated.	Appendix E of Amendment Report.
HNSW-03	Cultural Heritage	3. The scale of many of the maps of archaeological potential, recorded sites (including PADs) and proposed impacts does not allow for an understanding of the archaeological potential of the project area, the sites, or their potential impacts. Please provide maps of the project area at a scale to allow the information to be understood and allows for the identification of the AHIMS sites. Due to the projects need for ongoing detailed design throughout the assessment process please provide mapping including clear site and PAD boundaries including the site complexes referred to in the survey results (Table 8.4 of ACHAR).	Mapping has been updated in the Amended ACHAR (including better illustrating archaeological potential, recorded Aboriginal heritage sites and proposed impacts). The Project layout has been amended to reduce impacts to recorded Aboriginal heritage sites and, therefore, the Amended ACHAR and figures clearly identify what (if any) heritage site extents are still impacted.	Appendix E of Amendment Report.
HNSW-04	Cultural Heritage	4. Please provide detailed and thorough mapping which includes survey track logs, as per Requirement 5 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010), to enable Heritage NSW to assess the efficacy of the survey coverage. Please review and update Table 8.3 Survey Coverage Summary, the percentage calculations for 'very high (inside corridor)' are incorrect.	Survey track logs have been included on mapping in the Amended ACHAR. The survey coverage summary table has also been updated. The Amended ACHAR discussed in detail how ERM achieved adequate survey coverage consistent with the landform sensitivity approach discussed with HNSW in July 2022. The Amended ACHAR provides greater clarity regarding how the results of the survey support the predictive model, such that the model can be used to accurately predict the likelihood of cultural material, and how this fed into a landscape approach to the significance assessment and management.	Appendix E of Amendment Report.
HNSW-05	Cultural Heritage	5. Please provide further detail of identified sites, their contents and significance. The survey results (Table 8.4 of the ACHAR) refers to the identification of multiple site complexes and camp site areas that include combinations of Aboriginal Ancestral remains, mounds, hearths, shells and artefacts (including glass artefacts) that are not further described in the document. The significance assessment provided does not assess the significance of the sites which are combinations of the site types assessed for significance in Table 11.2. It is noted that glass artefacts are uncommon, and further clarification is required on the significance of this find, what this may mean for continued occupation of this area European contact.	As mentioned, the Applicant has undertaken a significant redesign, largely to avoid Aboriginal cultural heritage values and landscape formations that have the potential to contain yet unrecorded cultural material. This has included relocation of Project infrastructure and modifications to the micro-siting corridor to avoid known or potential values/features. This is detailed in the Amended ACHAR, which also includes expanded discussion on identified sites, their contents and significance.	Appendix E of Amendment Report.
HNSW-06	Cultural Heritage	6. The ACHAR notes a forensic anthropologist undertook a survey of the Aboriginal Ancestral remains sites. Please provide any reporting produced by the forensic anthropologist.	Reporting produced by forensic anthropologist Dr. Colin Pardoe following previous survey of Aboriginal Ancestral Remains (AAR) sites has been included in the Amended ACHAR.	Appendix E of Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
HNSW-07	Cultural Heritage	7. Heritage NSW recommends that all assessment should be undertaken prior to the approval of impacts to Aboriginal cultural heritage. Without adequate and complete assessment, in this instance subsurface testing, to establish the cultural significance it cannot be demonstrated that more places of significance or places which may further enhance the significance of the known Aboriginal cultural heritage in the area will not be found. The RAPs could also not have provided informed comments on the project. No objections to test excavation have been recorded from the RAPs. If adequate justification for not undertaking test excavation is not provided, Heritage NSW recommends that test excavations occur to inform the ACHAR.	The Mutthi Mutthi stated (email dated 9 October 2024) that their preference is for any required excavation to be undertaken post-determination of the Project. This would be included as a condition of consent and outlined in the Aboriginal Cultural Heritage Management Plan (ACHMP). The high significance and sensitivity of the cultural areas, most of which contain or have the potential to contain Aboriginal Ancestral Remains (AAR), means that the Mutthi Mutthi and other RAPs want to avoid all subsurface disturbance wherever possible. They are not in favour of subsurface testing to determine cultural significance, as they consider all areas with potential to contain AAR as being highly culturally significant. The Applicant has undertaken a significant redesign, largely to avoid Aboriginal cultural heritage values and landscape formations that have the potential to contain yet unrecorded cultural material. This has included relocation of Project infrastructure and modifications to the micro-siting corridor to avoid known or potential values/features.	Appendix E of Amendment Report.
HNSW-08	Cultural Heritage	8. Section 13.1.1. of the ACHAR states a small number of earth mounds are located in areas of low sensitivity. Please clarify the Aboriginal Sensitivity assessment and mapping. As no test excavations have occurred to these mounds located in the 'low' sensitivity area also have the potential for subsurface archaeological deposits including Aboriginal Ancestral Remains. Section 9.4 states the mounds were identifiable through aerial photography, please clarify if all mounds identified through aerial photography been subject to survey and their locations.	The Applicant has undertaken a significant redesign to avoid all earth mounds and, therefore, no additional survey or test excavation to confirm their potential for subsurface archaeological deposits including AAR is considered necessary. [Also see the response to HNSW-07]. Clarification of Aboriginal heritage sensitivity assessment and mapping, as well as extent of survey of any earth mounds identified through aerial photography rather than survey has been provided in the Amended ACHAR.	Appendix E of Amendment Report.
HNSW-09	Cultural Heritage	9. Heritage NSW notes as per Section 1.7 of the ACHAR 6 % of the very high to high, 56% of the moderate and 61% of the low archaeological potential landscapes within the Disturbance Footprint have not been surveyed. Please clarify how will this identified archaeological potential in unsurveyed areas be addressed in the event of proposed impacts. It is noted that it is recommended (Section 13.1.2 of the ACHAR) the micro-siting of project elements in unsurveyed areas triggers additional survey. Please clarify if additional survey is triggered for proposed impacts such as internal electrical network (overhead and underground) installation and internal road construction.	The sampling strategy developed for this Project was discussed with HNSW in July 2022. Achieving 100% survey across the entire Disturbance Footprint is a prohibitive exercise and unnecessary. Archaeological potential in areas within the Disturbance Footprint that have not been surveyed will be managed in accordance with provisions of the ACHMP, which will be developed in partnership with the RAPs. This may involve additional survey or managed through a combination of monitoring of ground disturbing works and an unexpected finds procedure. These recommendations have been made more apparent in the Amended ACHAR; however, the details will not be provided until the ACHMP is finalised.	Appendix E of Amendment Report.
HNSW-10	Cultural Heritage	10. Please provide the proposed management recommendations for all sites that are identified to be potentially subject to impact.	The Amended ACHAR includes management recommendations for all sites that are identified to be potentially subject to impact. However, the endorsed management activities will not be determined until the ACHMP is finalised, through consultation with the RAPs.	Appendix E of Amendment Report.
HNSW-11	Cultural Heritage	11. Please provide indicative methodologies of the proposed management recommendations including those for salvage and conservation (including exposed Aboriginal Ancestral remains).	Indicative methodologies for the management of cultural sites and material are provided in the Amended ACHAR and include: - Where impact can't be avoided, collection of surface artefacts and excavation of potential archaeological deposits; - Development of an ACHMP which will be informed by discussion with RAPs on: - Measures to manage collected or excavated archaeological material; - Measures to protect and conserve material that will not be impacted; - Requirements of cultural monitoring of ground disturbance works; - Requirements of heritage training and inductions for project personnel; and - An unexpected finds procedure The endorsed management activities will not be determined until the ACHMP is finalised, through consultation with the RAPs.	Appendix E of Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
HNSW-12	Cultural Heritage	12. A procedure for the management of unexpected Aboriginal objects and human remains must be developed in consultation with the RAPs and Heritage NSW. The procedure must be prepared in accordance with Heritage NSW guidelines and codes of practice.	An unexpected finds procedure will be included in the ACHMP, post-determination of the Project. The ACHMP will be developed in partnership with the RAPs and in consultation with HNSW.	Appendix E of Amendment Report.
HNSW-13	Cultural Heritage	13. Section 6.5 of the EIS identifies works required to upgrade the intersection of Keri Keri Road and the Sturt Highway. The intersection of Keri Keri Road and the Sturt Highway is outside the project area of the provided ACHAR. If upgrades involve ground disturbance, please provide assessment of the potential impacts to Aboriginal Cultural Heritage as required in the SEARs.	An assessment of the potential impact of required road upgrades along the transport route has been provided in an Aboriginal Cultural Heritage Due Diligence report appended to the Amendment Report.	Appendix P of Amendment Report.

4.5 MINING AND EXPLORATION GEOSCIENCE (MEG)

TABLE 4-5 MEG AGENCY ADVICE

Ref No.	Theme	Submission	Response	Where Addressed
MEG-01	Exploration Titles	MEG has reviewed the information supplied in relation to this Project and based on the review has no specific comments in relation to <i>Mining Act 1992</i> considerations and raises no issues regarding the Project at this stage. MEG advises the Proponent to actively monitor the MinView map viewer at https://minview.geoscience.nsw.gov.au/ for mining title changes that may interact with this project. MEG can assist with title holder contact details if required.	Noted. The Applicant will consult with MEG regarding mining title changes that may interact with the Project, if required.	This table

4.6 WATER NSW

TABLE 4-6 WATER NSW

Ref No.	Theme	Submission	Response	Where Addressed
WNSW-01	Water Licencing	WaterNSW has reviewed the EIS and found that the proposal is not located near any WaterNSW land, assets or infrastructure, therefore we have no particular comments or requirements regarding the proposal. Should the extraction of water from existing or new groundwater bores or water from other sources covered under the relevant water sharing plan be required, the proponent will need to apply for a Water Access Licence (WAL). Any such request will be assessed at time of application and are subject to availability.	Noted.	This table

4.7 CROWN LANDS

TABLE 4-7 CROWN LANDS

Ref No.	Theme	Submission	Response	Where Addressed
CL-01	Crown Lands	As per section 3.2.2 of the Keri Keri Wind Farm Environmental Impact Statement Report and Figure 3.3, Crown Lands notes that there are a number of Crown roads within the project area. These roads may provide legal access to the development but may not provide practical access. The Department advises that these roads should not be relied upon for practical access to the project site. It is also proposed, in Figure 1.2, that transmission lines, cabling, access tracks and other infrastructure may also be placed on or over Crown roads or land.	Noted. The Applicant is committed to ensuring that the Project detailed design and construction will consider the practicability of using Crown Lands paper roads for the Project. The Applicant has considered various environmental constraints and has amended the Project design to further reduce impacts. The detailed design phase will consider constructability of the Project and, where necessary, the Applicant will consult with the Department and upgrade paper roads to ensure safe access for the project.	Figure 1-3 of the Amendment Report

Ref No.	Theme	Submission	Response	Where Addressed
CL-02	Crown Lands	The Department will need to be referenced, prior to any use or occupation of any Crown roads or land, during the assessment phase.	Noted. When the design is finalised and the extent of interaction of the Project with Crown land/roads is understood, the Applicant will seek the necessary authority under the <i>Crown Land Management Act 2016</i> and/or <i>Roads Act 1993</i>. At this time, the Applicant will engage with Crown Lands to discuss and initiate the processes required to authorise the use of, access and/or transfer of ownership of Crown land and roads.	This Table
CL-03	Crown Lands	Authority to use, traverse, access or build infrastructure on Crown land and roads is required under the <i>Crown Land Management Act 2016</i> and/or the <i>Roads Act 1993</i> . It is recommended that the proponent contact Crown Lands as early as possible to discuss and initiate the processes required to authorise the use of and/or access to Crown land and roads.		
CL-04	Crown Lands	If infrastructure needs to be built on Crown land or roads, the consent of the Minister for Water, Property and Housing must be obtained, via Crown Lands, and constructed roads may need to be transferred to Council. Further information regarding land owner's consent for Crown land and roads can be found at the following link: https://www.crownland.nsw.gov.au/resources/guides-and-factsheets		
CL-05	Crown Lands	There are multiple Crown roads, including Crown roads with enclosure permits, both within and adjoining the proposed development area. Please refer to the attached map, where Crown roads are shown in Red and Crown roads with enclosure permits are shown in Blue. Any Crown road required for access to the development/proposal, will need to be transferred to Council, or application made to close and purchase the roads. As authority to access or use Crown roads is required prior to the commencement of any works or access, and to avoid any delays for the proposal, a tenure may be required in the interim. More information regarding Crown roads and Enclosure permits can be found at the following links: https://www.crownland.nsw.gov.au/licences-leases-and-permits/information-about-crown-roads and https://www.crownland.nsw.gov.au/licences-leases-and-permits/apply-or-manage-enclosure-permit		
CL-06	Crown Lands	If lineal infrastructure (such as pipelines and/or electricity transmission lines) are expected to traverse Crown land, roads and/or waterways, an easement over said Crown land, roads and/or waterways will be required for protection of the infrastructure. To discuss easement requirements, please contact the Acquisitions team at the earliest opportunity at: cl.acquisitions@crownland.nsw.gov.au .		
CL-07	Crown Lands	In order for transmission lines to traverse Crown land and/or roads, the proponent will need to apply for easements. Information regarding the easement process is available at the below link: https://www.crownland.nsw.gov.au/protection-and-management/easements As the easement process may be lengthy, it is also recommended that the proponent apply for a licence for each Crown road and Crown land lot as soon as possible. A licence will temporarily authorise use and access for the infrastructure to traverse Crown roads and Crown land whilst the easement applications are being processed.	Noted. If the need for an easement over Crown land, roads and/or waterways extent is identified when the design is finalised, the Applicant will engage with the Acquisitions team to discuss easement requirements.	This table.
CL-08	Crown Lands	Please note: Easements will only be considered for other authorities that have the power of acquisition under the <i>Land Acquisition (Just Terms Compensation) Act 1991</i> all other proponents will be required to authorise the occupation of Crown Roads/Land by applying for a Crown Licence. Details on how to apply for a licence are available at the below link: https://www.crownland.nsw.gov.au/licences-leases-and-permits/apply-or-manage-licence		
CL-09	Crown Lands	The Department may also need to consider the transfer of the affected Crown roads to the local Council.	Noted.	This table.
CL-10	Crown Lands	It is important to note that licences or easements must be in place before infrastructure can traverse Crown land or roads.	Noted.	This table.

4.8 DPI FISHERIES

TABLE 4-8 DPI FISHERIES

Ref No.	Theme	Submission	Response	Where Addressed
DPIF-01	Aquatic Habitat	Noting that the EIS concludes that the project area includes ephemeral waterways that do not contain suitable habitat for fish and aquatic invertebrates, DPI Fisheries provides the following advice: Direct and indirect impacts on aquatic habitats should be mitigated with the implementation of mitigation measures outlined in 6.1.6 <i>Mitigation Measures</i>.	Noted.	Section 6.1.6 of EIS
DPIF-02	Aquatic Habitat	Fish passage should be provided for when ephemeral waterways are inundated after heavy rainfall periods. As outlined in previous DI Fisheries advice and also noted in the EIS, the design and construction of watercourse crossings should be undertaken in accordance with the Department’s <i>Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013)</i> and <i>Why Do fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (2003).	Noted. Works that interfere with ephemeral waterways will be scheduled, where practicable, in periods when there is no flow. The design and construction of any waterway crossings will be in accordance with relevant guidelines. Any temporary waterway crossings (if required) will be removed immediately upon completion of the various stages of construction.	This table Appendix H of Amendment Report

4.9 DPI AGRICULTURE

TABLE 4-9 DPI AGRICULTURE

Ref No.	Theme	Submission	Response	Where Addressed
DPIA-01	Land and Agriculture	DPI Ag has reviewed the EIS and accompanying documentation and notes that the project EIS has considered the DPI SEARs requirements resulting in the perception that there would be minimal impact on regional agricultural productivity. However, there is still considerable impact on the hosting and neighbouring landholders. Although the EIS talks about various types of agreements with landholders, it is not clear what the mechanisms will be used for ongoing consultation with these landholders on the various aspects of construction, operation and decommissioning as outlined in the mitigation and management measures. The mitigation and management measures should include a specific measure that covers all impacted landholders being offered appropriate agreements and ongoing consultation arrangements covering the risks and issues raised in the EIS and accompanying documentation prior to commencement of works.	To clarify, the EIS and accompanying documentation did not state that there would be a significant impact on agricultural productivity on neighbouring landowners. There may be some disruptions; however, these can be managed such that impacts are minimise. It should be noted that neighbouring landowners are themselves hosts for other proposed projects - Baldon Wind Farm to the east, Wilan Wind Farm to the north, Abercrombie Wind Farm to the north and far east. Regardless, the Applicant will: - Ensure there is ongoing consultation between the Applicant and neighbours that may experience disruptions due to the Project; - Implementation of measures to reduce biosecurity risks between properties; - Consult with relevant neighbours regarding potential for disruption to their operations due to, for e.g., access restrictions, biosecurity; - Ensure the Rehabilitation strategy includes provisions to minimise impacts to neighbouring landholders; - Document procedures for construction activities that may disturb livestock; and - Implement communication protocols between neighbouring landholders and the Applicant during construction.	Appendix L of Amendment Report
DPIA-02	Land and Agriculture	Similarly, a biosecurity and weed management plan should be developed prior to the commencement of works. It should specifically consider the impact on agriculture of weeds, pests and pathogens and outline appropriate biosecurity protocols relevant to the local area and surrounding agricultural enterprises.	Noted. The Applicant is committed to developing a Pest and Weed Management Plan prior to construction.	In this table Appendix L of Amendment Report

4.10 FIRE AND RESCUE

TABLE 4-10 FIRE AND RESCUE

Ref No.	Theme	Submission	Response	Where Addressed
FRNSW-01	Hazards	FRNSW have reviewed the EIS with particular focus to 6.7 Hazards and Risks, along with the Preliminary Hazards Analysis (PHA). FRNSW notes the proposal of a 200MW/800MWH Battery Energy Storage System (BESS). BESS facilities pose special problems of firefighting and special hazards exist that may require additional fire safety and management measures. Should this project be approved FRNSW make the following recommendations: 26. That a Fire Safety Study (FSS) is developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2 and submitted to FRNSW for review. ◦ The FSS is to be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). ◦ The FSS should be prepared consistent with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations.	Noted. The Applicant is committed to addressing all requirements of the condition of consent, which may involve developing a FSS, including an IFSR and/or Performance-Based Design Brief / FEBQ.	This table
FRNSW-02	Hazards	2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1.	Noted. The Applicant is committed to developing a Bushfire Emergency Management and Operations Plan, as discussed in Chapter 5 of the Bushfire Risk Assessment Report (refer Appendix N of the EIS).	Appendix N of the EIS
FRNSW-03	Hazards	3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.	Noted. The Applicant is committed to addressing all requirements of the condition of consent, which may include developing an ESIP.	This table
FRNSW-04	Hazards	4. Prior to occupation or commissioning an Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW. The package should inform first responders of site -specific features and safety measures to ensure they are able to undertake their duties effectively in accordance with agency specific Standard Operational Guidelines. The format of the Induction Package should be such that it can be readily shared across all agencies.	Noted. The Applicant is committed to addressing all requirements of the condition of consent, which may include developing an Emergency Responders Induction Package prior to commissioning.	This table

4.11 NSW RURAL FIRE SERVICE (RFS)

TABLE 4-11 NSW RFS

Ref No.	Theme	Submission	Response	Where Addressed
RFS-01	Bushfire	NSW RFS has reviewed the Environment Impact Statement and Appendix N Bush Fire Assessment Report (NGH 12/4/2024) prepared for the Keri Keri Wind Farm. No objection is raised subject to a condition being included in development consent for compliance with bush fire mitigation measures detailed in Section 6.8 and Table 6-1 of the Bush Fire Assessment Report by NGH dated 12 April 2024	Noted. Please note that the Bushfire Assessment was prepared by ERM.	This table

4.12 AIRSERVICES AUSTRALIA

TABLE 4-12 RESPONSE TO SUBMISSIONS FROM AIRSERVICES AUSTRALIA

Ref No.	Theme	Submission	Response	Where Addressed
ASA-01	Aviation	Please find attached Airservices advice issued June 2023. Our advice remains valid if there is no change to the location and height of the proposed wind farm.	Noted.	This table

4.13 CASA

TABLE 4-13 RESPONSE TO SUBMISSIONS FROM CASA

Ref No.	Theme	Submission	Response	Where Addressed
CASA-01	Aviation	With regards to Visual Flight Rules (VFR) operations, pilots are permitted to fly as low as 500 ft AGL (i.e., terrain). The WTGs will reach up to a maximum height of approximately 291.5 m (956 ft) AGL. Except for Recommendation 9 '<i>Lighting of WTGs</i>', CASA agrees with the recommendations at Section 11 of the Aviation Impact Assessment. Contrary to Recommendation 9, CASA considers the proposed wind farm will be a hazard to aviation safety and recommends that the wind farm is obstacle lit with steady medium-low intensity red obstacle lighting in accordance with the National Airports Safeguarding Framework Guideline D '<i>Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation</i>' National Airports Safeguarding Framework Principles and Guidelines (infrastructure.gov.au) and section 9.31 of Part 139 Aerodromes Manual of Standards Part 139 (Aerodromes) Manual of Standards 2019 (legislation.gov.au) (lower level lights on the turbine support columns are not essential).	Noted. The Amended AIA includes a safety risk assessment of the proposed Project. This determined that obstacle lighting is not necessary for the safe operation of aircraft in the vicinity of the Project. Regardless, the Applicant will consider the submission by CASA and will develop an obstacle lighting plan in consultation with Project landowners, near neighbours, CASA and NPWS. While safety is paramount, visual impacts need also be considered.	Appendix J of the Amendment Report.
CASA-02	Aviation	International standards require 2,000 candela lighting intensity on the nacelle (also recommended in the NASF guideline) and 200 candelas at the mid-point of the turbine mast. CASA recommends that 200 candela as a minimum intensity lighting on the nacelle would suffice (due mainly to the lack of background lighting in the vicinity of the turbines). The obstacle lighting should be monitored to alert the wind farm operator of any outage and at least some of the obstacle lights remain on during an outage. CASA is prepared to review a lighting plan that indicates which turbines are proposed to be lit.	Noted. The Amended AIA includes a safety risk assessment of the proposed Project. This determined that obstacle lighting is not necessary for the safe operation of aircraft in the vicinity of the Project. Regardless, the Applicant will consider the submission by CASA and will develop an obstacle lighting plan in consultation with Project landowners, near neighbours, CASA and NPWS. While safety is paramount, visual impacts need also be considered.	Appendix J of the Amendment Report.
CASA-03	Aviation	As the Aviation Safety regulator, CASA does not consider the visual impact of obstacle lighting on neighbours / homesteads. However, there are mitigations for visual impact such as baffling and intensity control (as described in the Aviation Impact Assessment Table 10 / Page 57 'Effect of obstacle lighting on neighbours').	Noted. The impact of night lighting has been considered in the Addendum to the LIVA.	Appendix F of the Amendment Report.
CASA-04	Aviation	Further to Recommendation 11, and as recommended by the Aerial Application Association of Australia, CASA recommends that the following Australian Standard be considered regarding overhead transmission lines: AS 3891.2, Air navigation — Cables and their supporting structures — Marking and safety requirements, Part 2: Low-level aviation operations.	Noted. This has been included in the updated mitigation and management measures.	Appendix F of the Amendment Report.
CASA-05	Aviation	The impact on LSALTs (Lowest Safe Altitude) is covered in Aviation Impact Assessment Section 5 Consultation and Section 10 Conclusions but not specifically included in Section 11 Recommendations. The proponent (or the proponent's Aviation Consultant) should engage with Airservices Australia regarding the changes to LSALTs, before the offending WTGs have been erected. (Airservices may need some lead time).	Noted. The Applicant will engage with Airservices Australia prior to the construction of the Project regarding the changes to LSALTs.	Appendix J of the Amendment Report.

4.14 MURRAY RIVER COUNCIL

TABLE 4-14 MURRAY RIVER COUNCIL (MRC)

Ref No.	Theme	Submission	Response	Where Addressed
MRC-01	Project	1. Insist preliminary information from developers clearly addresses the scale, location, lifespan and impact of potential renewable energy projects. We want to see that all 'checks-and-balances' are in place and are effectively communicated to local communities.	The Applicant has and will continue to engage meaningfully with MRC and local communities. A summary of engagement activities was included in the EIS, as was planned future engagement. This has been updated in this report and the Amendment Report.	This table Section 5 of Amendment Report
MRC-02	Community Consultation	2. Insist the developers offer clear and thorough information on the likely economic, environmental and community impacts that these projects may have. This is not only about loss-of-land or amenity; what actual impacts will these projects - particularly wind farms - have on local agricultural product over the longer term.	The EIS, this report and the Amendment Report were prepared in accordance with relevant Commonwealth and state legislation and guidelines. Consultation was also undertaken in accordance with relevant guidelines. The SSD process provides for 'checks and balances', ensuring transparency throughout the approvals process. Throughout the process, relevant government agencies, councils and the public have significant opportunity to review, comment and recommend mitigation measures to ensure impacts are avoided, minimised or mitigated. The significant redesign of the Project as outlined in this report and the Amendment Report is testament to this. The primary driver of the redesign was impact avoidance or minimisation. The benefits of this redesign will be communicated to relevant stakeholders.	
MRC-03	Community Consultation	3. Encourage developers to offer information around direct community benefits and potential offsets for affected communities, including but not limited to financial compensation or support for community initiatives.	The Project EIS outlined the commitment the Applicant has made for community benefits. 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.	Section 5 of the Amendment Report
MRC-04	Economic and Social	4. Encourage communities to look beyond 'small improvement' projects funded via any community benefits programs and instead look towards long-term sustainable pathways for education, health or similar in the aim of addressing services that are declining or aren't currently available in our LGA.	Community benefits will be administered through a Planning Agreement. Benefits will be in accordance with the Benefit Sharing Guideline (DPHI, 2024) and are intended to support not-for-profit organisations, community programs/events, local businesses, training and services / infrastructure. The Applicant will continue to engage with MRC to discuss and agree on the provisions of the Planning Agreement. The Applicant will also prepare a Local Employment and Procurement Plan, outlining incentives for the EPC contractor to set targets for local employment and use local goods and services. This will provide further benefits to the local economy. Lastly, the Applicant has engaged with Murray River Council regarding the establishment of a Community Benefit Fund (CBF) to be administered under via a Planning Agreement. The CBF will provide additional benefits to the region.	
MRC-05	Community Consultation	5. Encourage ongoing consultation with landholders to ensure any questions they have are adequately answered prior to progressing.	The Applicant has and will continue to engage meaningfully with landowners and the local communities. A summary of engagement activities was included in the EIS, as was planned future engagement. This has been updated in this report and the Amendment Report to capture engagement undertaken since EIS exhibition. The engagement approach includes effective and genuine engagement with stakeholders and the local community to seek feedback, help inform the Project, ensure community concerns and comments are considered, and potential impacts are avoided, minimised or mitigated. Engagement will continue through subsequent phases of the Project. As part of our best practices in landholder engagement, we ensure the landholders for this project receive regular feedback on the project and planning updates. This includes monthly reports that were emailed to the landowner.	Section 3 Section 5 of Amendment Report Section 5 and Appendix D of EIS

Ref No.	Theme	Submission	Response	Where Addressed
MRC-06	Community Consultation	6. Insist First Nation's peoples are appropriately consulted as key stakeholders.	First Nation's people have been consulted throughout the development of the Project to date and will continue to be consulted throughout the life of the Project. First Nation's people are critical stakeholders to the Project as a whole, but specifically for the ACHAR. The ACHAR has been informed by extensive engagement with First Nation's people, and this will continue post-approval with their input into the required management of Aboriginal cultural heritage on the site.	Appendix E of the Amendment Report
MRC-07	Community Consultation	7. Remain engaged in the developer's community engagement processes with the view to being an active participant, alongside the community.	Noted. The Applicant is committed to continuous engagement with MRC during all phases of the Project.	This table
MRC-08	Economic and Social	8. Recognise that, as a local government organisation, we are not appropriately resourced to meet the rapid increase in the demand for support when these projects arise; both in addressing potential challenges and helping to maximise opportunities for the community. The complexities of dealing with multiple different energy projects at any given time puts resource constraints on the organisation and limits our ability to adequately service each affected community.	Noted. The Applicant appreciates the position that MRC are in and will work with Council to minimise pressure on council resources and develop a governance and administration structure that will not burden Council.	This table
MRC-09	Project	9. Continue to advocate for utilisation of existing infrastructure and transmission routes when projects connect to the grid to minimise the impacts to existing land use.	Connection of the Project to the distribution and transmission network is still being finalised. The Applicant is pursuing several options for this.	This table
MRC-10	Economic and Social	10. Strongly encourage local communities to educate themselves on all facets of a proposed renewable project. Council is generally brought into the process at the same time as the public, so it is imperative local landholders fully engage with any information straight from the source when it's available, as only they can assess the full potential impact on their land and/or product.	The Applicant has and will continue to engage meaningfully with landowners and the local communities. A summary of engagement activities was included in the EIS, as was planned future engagement. This has been updated in this report and the Amendment Report to capture engagement undertaken since EIS exhibition. The engagement approach includes effective and genuine engagement with stakeholders and the local community to seek feedback, help inform the Project, ensure community concerns and comments are considered, and potential impacts are avoided, minimised or mitigated. Engagement will continue through subsequent phases of the Project.	Section 5 of the Amendment Report Section 5 and Appendix D of EIS
MRC-11	Waste	The proponent is to provide a Waste Management Plan that is approved by the Local Authority (Council) and as part of the EIS. Conditions should be included to the effect of and the Waste Management Plan should detail how the Applicant will: a. minimise the waste generated by the development; b. classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); c. store and handle all waste generated on site in accordance with its classification; d. not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal; e. remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal; f. have an agreed Waste Management Plan approved by local council.	Noted. The proponent will provide a Waste Management Plan that is prepared in consultation with and approved by Council.	This table
MRC-12	Waste	In the information perused, Buronga Landfill is nominated as the main disposal location and Mildura for recoverable materials. There is also a statement that all of MRC's waste facilities as "potential" disposal sites. Council confirms that we do not accept the waste types required for disposal. State Significant Renewable Energy Developments promote that local communities 'receive benefits from the renewable energy projects they're hosting', however the experience of communities and local councils that lie in and around the South West REZ and who are currently hosting renewable developments believe the positive, sustainable impacts the state government is claiming are overstated and that there can be significant, detrimental impacts to the local community by hosting renewable developments.	Noted. A waste contractor will be engaged to manage the disposal of Project waste. Prior to Project approval, a Waste Management Plan (WMP) will be prepared in consultation with council. The WMP will specify appropriate waste disposal facilities and measures to achieve greater environmental outcomes from the waste produced.	This table

Ref No.	Theme	Submission	Response	Where Addressed
		REZ Development Applications are required to list waste management facilities for development waste that will be generated, however they do not consider the suitability of the waste management centre to accept the proposed waste. Local councils operate small, manageable landfill site for the protected, safe disposal of the local community’s rubbish. They are not suitable for managing large scale industrial waste and often are unlicensed which means they legally cannot accept large volumes of waste. Despite this, developers continually attempt to bring large volumes of waste to the small landfills, including oversize items that cannot be managed by the councils. Local waste managers put a blanket ban on accepting any materials from these project sites, only to often have the company ignore council wishes or exploit a loophole, so that one facility or the next must accept it. The developers contact rural landfills outside of the REZ as well, with evidence of requests to regional landfills over 200 kms from the REZ boundary to accept renewable development waste. When this waste is taken to the local landfills, the cost to process and transport this waste then falls back on the local community rather than the developers. Additionally, a lot of the waste received at the local facilities is recoverable or recyclable at dedicated recycling facilities, but rural townships do not have these dedicated facilities. Even where sites do accept some of the recoverable streams the volumes are large and often councils have to manage these materials and ultimately transport them elsewhere, which has an additional financial impact on councils and rate payers. Some manufactured items are not recyclable and should go back to the original manufacturer to manage the disposal of, or should be considered as part of an overall renewable energy industry stewardship program. The RAMJO councils support the continuation of these renewable projects in the region, however, there needs to be better waste management provisions with the overall goal of seeking to achieve higher environmental outcomes from the waste produced.		
MRC-13	Infrastructure and Services	In consultation with councils within our region, local government employees advise of various other challenges around renewable developments, these not only include the disposal of waste materials but extend to lack of connectivity due to the workers camps using the available internet, impact on council’s sewer systems, water treatment plants and impacts on roads which deteriorate due to these projects. These items then fall back on the local community and council to fund and repair.	The Applicant is committed to working collaboratively with MRC to ensure impacts on infrastructure and services. The Applicant will investigate the benefits of installing a private wireless network. Responses to other concerns raised in this submission are provided below.	This table.
MRC-14	Water and Sewage	Murray River Councils existing water and sewer infrastructure is unable to service a development of this scale. Council requests confirmation of the volume of water required and where it will be sourced prior to any construction to ensure there are no impacts to the community. We also request any upgrades required to Councils assets due to increased demand from the development are fully funded by the development. This would include any impacts from services provided by a third party for example carting water to the development and carting sewer from the development. Considering there are several developments proposed in the region with the same resource requirements Council requests that the applicant ensures that it has sufficient water for the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the <i>Water Act 1912</i> and/or the <i>Water Management Act 2000</i>, the Applicant is required to obtain the necessary water licences for the development.	The Applicant intends to install septic or pump out sewerage systems at the temporary workforce accommodation camp and at the O&M facility. Approval will be sought from MRC in accordance with the <i>Local Government Act 1993</i>. During construction, sewage will be carted to an appropriate treatment plant. The Applicant does not anticipate that upgrades to MRCs existing waste water and sewage treatment plant will be necessary to accommodate sewage disposal during construction; however, if this is not the case the Applicant will engage with MRC to find a solution. The bulk of sewage produced by the Project will be during the construction phase. Sewage produced during operations is not expected to impact MRCs assets. During construction, non-potable water comprises most of the water demand. The Applicant is investigating options to source this water, including extraction from: • On-site farm dams (note that the landowner intends to de-stock the property during construction, therefore, this will not impact stock water requirements); • Groundwater aquifers, subject to necessary approvals; and • Permanent water sources, subject to necessary approvals. The above non-potable water options will not impact MRCs assets or water supply. Quantities available for extraction will be subject to approval, which are in place to minimise impacts. If the above options to not satisfy non-potable water demand during construction the Applicant will cart non-potable water in from off-site.	This table.

Ref No.	Theme	Submission	Response	Where Addressed
			Potable water demand during construction is relatively small. Rainwater tanks will be installed at the workforce accommodation camp; however, these are unlikely to meet construction potable water demand. Any surplus potable water required will be purchased and carted to site. 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. All relevant licences will be obtained by the Applicant.	
MRC-15	Road and Infrastructure	Dilapidation surveys shall be undertaken and agreed as the current condition of all affected sealed roads prior to the commencement of works. Repairing and returning affected roads to pre-works condition (based on the dilapidation survey) at the completion of the construction and commissioning phases of the project. The dilapidation survey will be used at the end of the project as an objective tool to ensure the road is returned to Council in the pre-construction condition. However, waiting until the end of the project to undertake repairs is not practical. Commitment to maintenance of affected roads both during and post construction works for damage of sealed roads that is deemed to be caused to by the additional development traffic. This would be separate to the dilapidation survey requirement and is for routine maintenance that cannot wait until the end of the project. Full length gravel resheeting to the selected unsealed sections of the local road network shall be a minimum depth of 100mm and widened in accordance with Table 3.9 of ARRB's Unsealed Roads Best Practice Guide. All existing culvert and bridge infrastructure shall be assessed along the local road network to determine acceptability of use along the designated route during the detail design phase.	The Applicant has committed to undertake a road dilapidation survey (s6.5.4 of the EIS) prior to construction to determine the current condition of roads required to be used during construction. The condition of roads will be monitored throughout construction. Any damage that results in safety risk to road users will be repaired immediately by the Applicant. All other damage (beyond usual wear and tear) will be repaired to the pre-construction condition by the Applicant at the completion of construction, or as agreed with MRC.	This table. Appendix B of the Amendment Report.
MRC-16	Traffic Volumes	The existing project traffic volumes in the TIA only represent the light vehicles and not all the project traffic volume and vehicle types. The TIA and turn warrant assessment (see Figure 3.25 of AGTM Part 6) must be revised to account for all construction traffic volumes and vehicle types for each public and private access to the state road network. - The revised turn warrants assessment is required to: - Apply AM / PM construction traffic volumes (with a ratio of light and heavy vehicles and turning volumes) for the worst-case scenario at each public and private connection. - Include background traffic volumes measured at AM/PM network peaks, annual growth rates applied linearly to peak construction and accumulative traffic volumes for project AM/PM peak traffic hours (for overlapping period) of any significant projects (at EIS stage or approved). - Include input for turn warrant assessment(s) (i.e. project traffic, turning and background traffic volumes, growth rates, and accumulative traffic volumes). Data must be plotted on turn warrant nominal graphs for each public and private access to the state road network. - Assess Safe Intersection Sight Distance (SISD) at each existing public and private road intersection with project related new and existing accesses to the local road network. Measures required to achieve SISD are to be provided. - The TIA states traffic surveys were undertaken at the intersection of Keri Keri Road and Sturt Highway between 18 and 21 September 2022. This is only a short period of time and is not reflective of various harvest seasons that the construction period will cover, which should be considered. It is	Noted. The Updated TTIA accounts for all Project construction traffic volumes and vehicle types for each public and private access to the state road network. This also considered the reduction in traffic volumes due to the decrease in the number of WTGs required for the amended Project. The Updated TTIA also considers the design vehicle accessing each public and private access to the state road network.	Appendix I of the Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
		also recommended that the raw data to the traffic survey is provided as an appendix. - The TIA must be updated to identify the design vehicle (largest heavy and OSOM vehicles) accessing each public and private connection to the state road network. - The TIA must be revised to clearly distinguish light and heavy vehicle routes for all project stages and connections to the local road network.		
MRC-17	Workforce Accommodation	- Identify timing and sequencing of workforce accommodation camp construction. - Identify traffic generation and vehicle types for workforce accommodation camp construction during AM / PM peaks. - Provide a turn warrant assessment for the worst-case scenario of workforce accommodation camp construction and post-completion (entire operation). - Identify traffic volumes required for pre-construction work that will occur in parallel. - Assess operational traffic volumes for servicing accommodation camps, vehicle types and AM / PM peak hour changes for traffic generation at each intersection with the local road network along construction transport routes.	The timing and sequencing of workforce accommodation camp construction is provided in the Amendment Report. The construction of the workforce accommodation camp will occur prior to site establishment works; however, site establishment works will commence prior to the completion of the workforce accommodation camp construction once the required number of beds for the construction workforce required for site establishment is achieved. Traffic associated with the workforce accommodation camp has been assessed in the Updated TTIA. This includes traffic generation during the AM/PM peaks, a turn warrant assessment, pre-construction traffic volumes, and traffic volumes associated with servicing the accommodation camp.	Section 6.4 and Appendix I of the Amendment Report.
MRC-18	Workforce Accommodation	Council would like to emphasise the critical importance of addressing worker accommodation during the construction phase. It is imperative that detailed plans for temporary worker accommodation are provided, ensuring that these facilities are strategically located to minimise disruption to local communities. This includes implementing robust traffic management and noise reduction strategies to protect the well-being of our residents. Council insists on stringent measures to mitigate environmental impacts. This encompasses comprehensive waste management protocols, water conservation efforts, and ensuring that worker accommodation does not adversely affect local wildlife or ecosystems. The health and safety of workers must be prioritised, with adequate medical facilities and services, and disease prevention measures in place. Local health services are already under significant pressure, and this project must not place any further burden on them; these services must be provided by the developer. The ongoing accommodation requirements, once the development has been completed and is operational, also needs to be considered and addressed. Our communities are currently experiencing a severe shortage of housing; therefore, developers must ensure they organise adequate accommodation for their workers, independent of the current accommodation supply within the community. Council requests the development of and consultation during the creation of an Accommodation Strategy.	The Applicant is committed to developing a Workforce Accommodation Plan that will outline how impacts will be avoided, mitigated and managed. The workforce accommodation camp is proposed within the Project boundary. The Workforce Accommodation Plan will be prepared in consultation with Murray River Council. The Workforce Accommodation Camp will accommodate the expected workforce for the Project. Impacts associated with traffic generation, access and egress at the workforce accommodation camp have been assessed in the Updated TTIA. There is no significant change in the level of service of the road network due to the Project. Waste management at the workforce accommodation camp will be detailed in the Waste Management Plan. Adequate waste receptacles will be provided, and a waste management contractor will be engaged to manage waste collection and disposal. Biodiversity impacts relating to the construction of the workforce accommodation camp have been addressed in the Updated BDAR. The camp has been positioned in the previously defined micro-siting corridor. Operation of the workforce accommodation camp is not expected to impact wildlife or ecosystems. The workforce accommodation camp will have on-site health and medical services and facilities. Standard operating procedures for medical emergencies will be developed. The Applicant intends to employ locally for operational jobs; however, if appropriately qualified locals are not available, the operational workers may come from other regions. The operational workforce is expected to be 12 FTE and is not expected to be a burden on housing availability.	Appendix I of the Amendment Report.

Ref No.	Theme	Submission	Response	Where Addressed
MRC-19	Workforce	A Workforce Development Strategy is necessary, and Council should be consulted prior to finalisation. The Strategy should focus on training and employing local residents where possible, thereby enhancing local skills and providing long-term economic benefits to the community. Long-term employment opportunities for local residents should be created, not only during the construction phase but also for ongoing maintenance and operational roles. Developers should engage with and support local businesses by sourcing materials and services locally, where possible. Detailed plans on managing increased traffic and ensuring local infrastructure is not adversely affected are also essential.	The Applicant intends to employ locally for both construction and operational jobs, subject to the requisite skills and experience being available in the local workforce. The Applicant will fill all available roles, as far as feasible with local employment; however, where we are unable to fill positions due to lack of local labour or skills gaps, we will look to fill positions from outside the community. The Applicant also intends to source goods and services locally, where these goods and services meet the construction and operational requirements. The Applicant will also establish, via the CBF, vocational courses targeted at developing skills relevant to the construction and operation of the Project. However, inevitably, workers from other regions will be required. As discussed above, increased traffic has been assessed in the Updated TIA. The Updated TTIA concluded that there is no significant change in the level of service of the road network due to the Project. The Applicant will continue to meaningfully engage with the community and relevant stakeholders throughout the development of the Project. The Applicant will engage with Murray River Council during the development of the Workforce Accommodation Plan.	Appendix I of the Amendment Report.
MRC-20	Consultation	Ongoing community consultation and transparent communication throughout the project are crucial to address community concerns and keep residents informed.	Noted. The Applicant is committed to continuing engagement in a transparent and meaningful way to ensure that community concerns are addressed.	This table.
MRC-21	Community Benefits	Council expects developers to negotiate with us regarding developer contributions, including the establishment of Voluntary Planning Agreements.	The Applicant has committed to establish a CBF, administered via a Planning Agreement. The applicant is currently engaging with MRC to discuss the contributions that will form the Planning Agreement. This will be agreed with MRC prior to construction of the project.	This table.
MRC-22	Cumulative Impacts	Developers must conduct comprehensive assessments of the cumulative impacts of their proposals, considering the combined effects with other existing or proposed major projects in the region. This includes evaluating the overall environmental, social, and infrastructure impacts to ensure sustainable development.	The cumulative impact assessment has been updated.	Section 6.4 of the Amendment Report.

4.15 REQUEST FOR INFORMATION – DPHI

TABLE 4-15 DPHI REQUEST FOR INFORMATION

Ref No.	Theme	Submission	Response	Where Addressed
DPHI-01	Hazards – Blade Throw	From the projectile throw risk assessment in PHA Section 5.2.4 and Figure 29, it is understood that the HIPAP 4 location specific individual risk criteria (LSIR) for ‘active open space’ (10 pmpy) is exceeded at the rest area along the Sturt Highway. From PHA Figure 29, it appears that the cumulative risk at the rest area was based on risks originating from Turbines 166, 177 and 26. However, PHA Figure 2 and the detailed maps in EIS Appendix F only shows Turbines 177 and 26 without showing Turbine 166. As such: 1. Confirm if Turbine 166 will be installed as part of the SSD. If not, reassess the risk based on the finalised location of turbines (PHA Figure 2, EIS Appendix F or otherwise) and confirm if the LSIR criteria for ‘active open space’ (10 pmpy) is still exceeded at the rest stop. 2. If Turbine 166 is confirmed to be installed as part of the SSD or if the LSIR criteria for ‘active open space’ (10 pmpy) is still exceeded at the rest stop despite the removal of Turbine 166, provide further recommendations on how the risk at the rest stop can be minimised (turbine repositioning, slew/rotation restrictions, smaller turbines, etc.).	Figure 29 of the PHA shows WTGs 186, 177 and 26, which were the 3 WTGs presenting the cumulative risk to Willow Rest Area. WTG 186 has been removed from the Project. The Amended PHA assessed the amended Project layout against HIPAP4. 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 has been recommended that WTG 177 be relocated 50 m to the south.	Appendix M of the Amendment Report
DPHI-02	Hazards – BESS	From the BESS hazard analysis, PHA Sections 5.1.3.2 and 8.2 recommended a minimum 3 m separation distance between adjacent BESS containers. However, it remains uncertain from the PHA and EIS if the proposed 200 MW / 800 MWh total BESS capacity would be able to fit within the BESS area footprint shown in PHA Figure 2 and EIS Appendix F while considering the required area spacing from implementing this recommendation. We also note from EIS Table 3-1 that the BESS area footprint can be estimated to be 17.39 ha. As such, confirm if the proposed total BESS capacity can fit within the BESS area footprint while considering the estimated number of BESS containers and the 3 m separation distance between containers.	The Updated PHA provides an indicative layout of the 200 MW / 800 MWh BESS with 3 m separation between adjacent BESS containers within the 400 m x 300 m BESS compound. This demonstrates that there is adequate space within the BESS compound for the required BESS units and inverters. 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.	Appendix M of the Amendment Report
DPHI-03	Grid Connection	Requesting information on how the Project intends to connect to the transmission network (email dated 22 October, 2025).	The Applicant acknowledges the Department’s observation regarding the announcement by EnergyCo (23 April 2025), which confirmed that the Project was not successful in obtaining access rights to the SW REZ transmission network. Regardless, the Applicant is committed to developing the Project and is exploring a range of viable transmission connection pathways. These include: • Data Centre Co-location (Behind-the-meter partnership); • Collaboration TransGrid/Lumea and other developers to upgrade the existing 220 kV network infrastructure; • Future SW REZ augmentations; and • Joint transmission development with other developers.	This table.

5. RESPONSES TO PUBLIC AND SPECIAL INTEREST GROUP SUBMISSIONS

This section responds to the submissions received from the public and special interest groups. Submissions have been grouped by themes as described in Section 2. A submission reference number (ID) is provided for the issue to identify which stakeholders have raised each issue. Appendix A identifies each specific stakeholder reference number.

As outlined in Section 2.1, 34 submissions were received from the public and special interest groups. Public submissions received, both in support and objection to the Project, had similar themes, and therefore most of the responses detailed below relate to multiple submissions. Examples of specific quotes from the submissions are provided for each theme to provide further context regarding the issue raised. Submissions of support for relevant themes are highlighted in light green.

The quantity of submissions stated for each theme relates to the number of total submissions and generalised where appropriate. Not all submissions have been presented in each table per theme to avoid length and repetition. A single submission may cover multiple themes and while this does not change the total number of submissions, such submissions have been truncated to highlight content specific to the theme.

5.1 THE PROJECT

5.1.1 LOCATION

5.1.1.1 SITE SELECTION

TABLE 5-1 SUBMISSIONS REGARDING SITE SELECTION

Submitter ID	Example Text from Submission
S-72004464	"Why should our "back yard" be littered with these towers to benefit those in the cities. Move them closer to the cities!"
S-71570708	"...this is not what we want in Country NSW, in our backyard."
S- 72157036	"The harms and costs should to the extent reasonably possible be carried by those people demanding and consuming the end product. Rural Australia is being disproportionately harmed."
S-71566782	"Not viable for this area. We are a long way from where the energy needs to be."
S-72004464	"I don't believe that ALL of the science is in, the unbiased and the complete unadulterated science to support these turbines. Why should our "back yard" be littered with these towers to benefit those in the cities. Move them closer to the cities!"

The site selection process for the Project was commensurate with the requirements set out in the *Wind Energy Guideline for State Significant Wind Energy Development* (DPHI, 2024a). Section 2.1 of these guidelines outlines where large-scale wind energy development is permitted in accordance with the EP&A Act and the relevant environmental planning instruments, including State Environmental Planning Policies (SEPPs) and local environmental plans (LEPs). Key provisions include:

- The zoning and land use provisions of the relevant LEP;
- Section 2.36(1) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP); and
- Clause 20 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP).

The Project is also within the South West REZ, which was established by the NSW government to connect reliable, affordable energy to everyone in NSW through high voltage power lines.

The permissibility of wind farm developments in NSW is determined by the Transport and Infrastructure SEPP. Section 2.36(1) of the Transport and Infrastructure SEPP states that 'electricity generating works' may be carried out with development consent on land within a prescribed rural, industrial or special use zone. Under the Wakool LEP, the Project area is zoned in its entirety as *RU1 – Primary Production*. RU1 is a prescribed rural zone, and therefore the Project is permissible with consent under the provisions of section 2.36(1) of the Transport and Infrastructure SEPP.

The outcomes of technical assessment undertaken for the EIS were used to inform the Project layout. Those relevant to the proximity of the Project to dwellings include noise and visual impact.

These assessments concluded that:

- Construction and operational noise levels complied with criteria at all associated and non-associated dwellings (Section 6.4.4 and Appendix I of the EIS);
- No noise impacts due to the Project are expected at the Willows Campground in the Yanga SCA (Section 6.4.4 and Appendix I of the EIS); and
- The visual impact at 11 of 13 non-associated dwellings was determined to be low, while 2 may have a moderate impact. Compliance with the Bulletin can be achieved with the implementation of mitigation measures (Section 6.6.4 and Appendix K of the EIS).

The Project layout has been amended since exhibition of the EIS in response to submissions received, to further avoid or minimise environmental impacts, and to optimise constructability. The noise and visual impact assessments have been updated to assess this revised Project layout. The updated noise impact assessment concluded that construction and operational noise levels complied with criteria at all associated and non-associated dwellings, and that no noise impacts were expected at the Willows Campground in Yanga SCA. The updated visual impact assessment concluded that visual impacts in Yanga SCA will be negligible.

The Project will also provide significant social and economic benefits including an increase in local employment and economic activity associated with construction.

5.1.1.2 INSUFFICIENT WIND RESOURCE

TABLE 5-2 SUBMISSIONS REGARDING WIND RESOURCE

Submitter ID	Example Text from Submission
S-72268715	"Having lived in this area for 40 + years and having looked into setting up an off the grid home I would never set up a wind farm in this area and expect it to provide electricity even with a battery. We simply do not get enough wind for wind turbines to be a viable option for providing electricity!"

There are seven renewable energy zones (REZs) established in NSW, including the South West REZ (Figure 5-1), which is where the Project is located. REZ concentrate new wind and solar power production in areas where it can be effectively generated, stored and distributed across NSW.



FIGURE 5-1 SOUTH WEST REZ

(Source: NSW EnergyCo 2024, available at [South West Renewable Energy Zone | EnergyCo](#))

The selection process for the area now declared as the South West REZ used detailed geospatial mapping to determine areas with:

- An abundance of high-quality wind and solar resources;
- Proximity to existing and planned transmission infrastructure;
- Lower population density; and
- Compatibility of renewable energy with existing land uses.

As discussed, Section 4.2 of the Wind Energy Guideline (DPHI, 2024a) outlines the considerations for site selection for wind energy projects. The Applicant went through a rigorous process to select the Project area, with consideration of the requirements of the Wind Energy Guideline. This included adequate wind resource to make the Project viable. Since signing an 'Option to Lease' agreement with the landowners, the applicant has continued to monitor the wind resource at the site, and specifically at the height of the proposed WTGs.

The Applicant has an extensive history of developing renewable energy projects and has an intimate knowledge of the attributes that make a site suitable for a wind farm. They also have extensive experience in modelling site conditions and using other variables to understand the commercial viability of a project.

5.1.2 DECOMMISSIONING AND REHABILITATION

5.1.2.1 REHABILITATION

TABLE 5-3 PUBLIC SUBMISSIONS REGARDING DECOMMISSIONING AND REHABILITATION

Submitter ID	Example Text from Submission
S-72241957	"I oppose this project because it is very unlikely that the decommissioning, removal and land rehabilitation will occur due to the exorbitant cost that will be involved. The cost in 20 years or so time will likely exceed today's cost to build the project. Unlike mining companies there is no requirement for this developer to lodge a bond to cover this future cost. Who will ultimately pay? The new owner of the plant, the host landholders, the local ratepayers or the State and/or Federal governments. The project must not be approved unless such a bond is in place."

The Applicant has committed to undertake an assessment of decommissioning options and suitability, prior to the potential cessation of operation of the Project (i.e., 30 years). At this time, the Applicant will assess the feasibility of options, including:

- Continuation of operations (subject to condition of existing WTGs and Development Consent);
- Repowered the WTGs using WTG technology available at that time; or
- Decommissioning.

Should decommissioning be the preferred option, this will be carried out in accordance with the Decommissioning and Rehabilitation Plan that would be prepared for the Project no less than five years prior to decommissioning, approved by the relevant regulatory body, and be in accordance Development Consent.

Decommissioning of the Project will be funded in full by the Applicant

The implementation of mitigation measures during construction and operation of the Project will benefit effective decommissioning such that no permanent impacts on agricultural resources or enterprises are expected.

The Environmental Management Strategy (EMS) to be established for the Project will include provisions to manage environmental risks during decommissioning.

The "Option to Lease" agreement that the Applicant has signed with the host landholders, includes clauses relating to the cost, responsibility, and scope of decommissioning vested with the Applicant. Lease fees are payable to the host landowners until decommissioning of the Project is completed.

5.1.2.2 END-OF-LIFE RECYCLING

TABLE 5-4 PUBLIC SUBMISSIONS REGARDING END-OF-LIFE RECYCLING

Submitter ID	Example Text from Submission
S-72242706	"The recycling of thousands of tonnes of lithium batteries is not yet viable and, due to their short economic lives, will pollute our environments in a few short years."
S-71457956	"...a liability of an impossible land reclamation after a very short term of subsidised energy production and an ever-growing pile of non-recyclable rubbish that we have forever."
S-71566818	"Destruction of native wildlife and their habitat for an unreliable energy resource that isn't recyclable and is reliant on high voltage transmission lines that will result in more environmental destruction throughout Australia."

As discussed in s6.11.3.5 of the EIS, the Applicant will prepare a Decommissioning and Rehabilitation Plan 5 years prior to the intended decommissioning date of the Project. This plan will include details of how the Applicant intends to minimise end-of-life Project waste going to landfill.

Much of the technology and infrastructure to be used for the Project can currently be recycled, including up to 90% of each individual wind turbine (CEC, 2025). Clean energy technology and infrastructure recycling is advancing rapidly such that at the anticipated time of decommissioning, ~2060, wind turbines and most of the other project infrastructure may be fully recyclable.

At present, about 85 – 100% of the materials used on wind farms, such as steel, copper and concrete are recyclable and can be recycled in Australia (CEC, 2025). This recycling recovery rate exceeds the 80% target set in the National Waste Policy Action Plan. Wind turbine blades are the most complex to recycle as they comprise resins, fibreglass and carbon fibre – composite materials that are currently difficult to recycle. However, the world's leading wind turbine blade manufacturers are working to increase the recyclability of wind turbine blades to 50% by 2025 and 100% by 2030.

In Europe, wind turbine blades are also being increasingly repurposed into, for e.g., bus stops, playground equipment, public seating, and there are even designs for bridges and farming equipment made from repurposed blades.

Similarly, about 95% of a lithium-ion battery is currently recyclable. This typically involves extracting critical minerals and repurposing them for new battery production. This strengthens supply chains by creating a circular economy.

The Applicant is working on different recycling programs with the goal to achieve 100% recycling of WTGs. WTGs are composed of common materials (e.g., steel, copper, plastic, electronic equipment) which existing waste management facilities can manage and recycle. The Applicant estimates that, by the time of decommissioning of the Project, 98-99% of WTG materials will be recyclable.

Acciona Energia is exploring recycling options, particularly for WTG blade, and has a commitment to achieve 100% recycling of WTGs.

5.2 JUSTIFICATION AND EVALUATION

TABLE 5-5 SUBMISSIONS REGARDING THE JUSTIFICATION OF THE PROJECT

Submitter ID	Example Text from Submission
S-71204467	"I support the project. The renewable transition is critical to the state and east coast."
S-72214975	"This project will benefit generations to come along with local business jobs and community growth"
S-71457956	"Another taxpayer funded abomination that the end result is much expense for no gain! Destruction of food producing land, visual destruction of landscape and a liability of an impossible land reclamation after a very short term of subsidised energy production and an ever-growing pile of non recyclable rubbish that we have forever. Not counting the millions of litres of used turbine oil and the possible contamination to mention just a few of the negatives of this misguided warm and fuzzy to be seen to be doing effort of saving the planet!"
S-71565734	"I object to the wind farm. Ugly unviable energy resource that is destroying the environment, native animals and our rural communities."
S-71570708	"Wind "farms" do not provide a reliable source of Energy Security. They are weather dependant with a limited lifespan. ... Regional NSW should not have to bear the burden of supporting metropolitan cities and their power usage."
S-71566799	"i object to this Wind farm. It will be an ugly sight on our beautiful countries landscape. They are an unreliable energy resource that is an environmental disaster which has already been proven in other countries around the world. Endangered wild life and habitat is being destroyed and local communities blighted."
S-72231461	"The opening paragraph that the project will provide clean, renewable energy that will power 579,000 NSW homes are falsehoods. So are the claims that it will provide cleaner, cheaper and reliable electricity while also reducing greenhouse gas emissions contribute and the impact of climate change. The wind works will be idle about 70% of the time on average over a year. So 579,000 NSW households will go without power during these times. Certainly not clean. ... Cheaper electricity from wind and solar works has not been achieved anywhere in the world when total system costs are included. Certainly not reliable. No wind no electricity."
S-72256462	"Re infrastructure, turbine/solar & line don't belong anywhere. Australia needs reliable energy generation. I have work with the weather for 40 yrs is is extremely unpredictable and very unreliable."
S-72271708	"Objecting to this project due to affected agricultural land, large amount of turbines and not reliable renewable option!"

The benefits of wind energy compared to energy produced from fossil fuels are undeniable. The overwhelming majority of scientist agree that human activities are influencing the climate (NASA, 2025). About 90% of the world's carbon emissions come from the burning of fossil fuels. In Australia, energy production (using coal, oil, natural gas) is the greatest contributor to our carbon emissions (+30%), followed by transport, agriculture and industrial processes.

GenCost (a collaboration between CSIRO and AEMO) reports have, since 2018, provided a comparison of the cost of energy production by the various sources (e.g., coal, nuclear, renewable). Since the first GenCost report in 2018, renewable power, backed by storage, has been the most cost-effective form of energy production. In 2025, the wholesale costs of power (i.e., the price that electricity retailers pay, which accounts for over 40% of our power bills) from renewables was \$72/MWh, whereas energy production from coal and gas was \$129/MWh, while nuclear was \$145-\$238/MWh (Graham, et al., 2025). Beyond capital costs, the timing for the development of nuclear energy infrastructure within Australia, and the development of a legal framework to allow permissibility, also presents a constraint (Graham, et al., 2025).

As discussed in s5.1.1.1.1 of this report, the Project is strategically located within the SW REZ, a region identified for its strong wind energy potential with easy access to existing transmission infrastructure. The inclusion of a BESS will enhance grid stability and reliability, provide cost savings through peak shaving and load shifting, overall supporting renewable energy integration by storing excess power

The Project represents a significant investment (~\$2.8B) in the region, supporting local employment and businesses. The Applicant has also committed to establish a Community Benefit Fund to be administered by Council and to be used for various community enhancement projects.

5.3 PROCEDURAL MATTERS

5.3.1 EXHIBITION INFORMATION

TABLE 5-6 SUBMISSIONS REGARDING PROJECT LAYOUT CHANGES

Submitter ID	Example Text from Submission
S-72260956	"In the region Keri Keri Wind Electricity Generating Works, suggesting this: - Exhibition Page says 170 Turbines But Elsewhere says this: - Exhibition Notice says 155 Turbines?? What is Going On?"
S-72267728	"The Exhibition Page says Development of a wind energy generation project with up to 170 wind turbines, with transmission connection, energy storage and associated infrastructure. Yet the Exhibition Notice says 155 Wind Turbines ?? - 1 GW. Please FIX YOUR ERRORS & REPEAT KERI KERI WIND EXHIBITION CORRECTLY!"

The Project EIS provides a timeline of layout changes made to the Project since its origination. Those layout changes have considered technical, environmental, and social constraints. The original Project, as presented in the Scoping Report (March 2022), comprised 176 WTGs with a generation capacity of up to 1,003.2 MW. During the preparation of the EIS the layout was optimised and revised to consider constraints associated with Aboriginal cultural heritage, biodiversity, noise and visual impacts. This process reduced the number of WTGs to the 155 presented in the EIS. The evolution of the Project layout was described in s2.3.4 and s7.1 of the EIS.

Since exhibition of the EIS, the Applicant has revised the Project layout such that the amended Project now comprises 114 WTGs.

5.4 ECONOMIC, ENVIRONMENTAL AND SOCIAL

Since the submission of the EIS the Applicant has revised the Project layout, reducing the number of WTGs from 155 to 114 and relocating infrastructure to further avoid or minimise impacts and, in some instances, to respond to submissions raised. Many of the technical assessments that informed the EIS have also been updated to assess the revised layout and, where necessary, respond to submissions raised. The Amendment Report provides these updated technical assessments as well as details on the amendments to the Project and how these have largely resulted in a reduction of impacts.

5.4.1 BIODIVERSITY

5.4.1.1 HABITAT LOSS

TABLE 5-7 PUBLIC SUBMISSIONS REGARDING HABITAT LOSS

Submitter ID	Example Text from Submission
S-71566788	"I object to these ineffective, ugly monstrosities destroying our native flora, fauna, the environment and local communities."
S-71572476	"Objection. This construction will not be in any way environmentally friendly. Removal of native wildlife and habitat for roads and construction of these ugly wind turbines which will be seen from many km."
S-72271473	"An unnecessary project destroying farm land and native habitat"
S-71566818	"Destruction of native wildlife and their habitat for an unreliable energy resource"
S-71566799	"Endangered wild life and habitat is being destroyed and local communities blighted."
S-72003965	"The destruction and disruption to flora and fauna in the processes is completely unacceptable."
S-72230210	"The turbines are toxic & ruin our environments natural habitat & community livelihoods."
S-71214456	"There are many environmental impacts. Some which are: Yanga State Conservation Area to the west of the Project area, which is zoned C1 - National Parks and Nature Reserves. Nitre Goosefoot shrubland wetland Freshwater Wetlands PCT 160 is associated with Artesian Springs Ecological Community in the Great Artesian Basin - Critically Endangered EXTREMELY RARE Australian Painted Snipe in Balranald Wetland areas."

The BC Act requires that any SSD project must assess biodiversity impacts and document these in a BDAR. A BDAR must be prepared in accordance with the biodiversity assessment method (BAM), which sets out a consistent method to assess potential impacts on threatened species and ecological communities, their habitats, and biodiversity values. The BDAR must also demonstrate that the project has avoided or minimised impacts.

The BDAR that accompanied the EIS included an assessment of potential impacts on native vegetation and habitat and, while impacts to native vegetation are inevitable, these were minimised to the greatest extent possible. Since completion of the EIS, further survey work has been undertaken to remove the need to assume presence of several threatened species, and either reduce the impact to these species or eliminate their presence from the Project area.

Additionally, the revised layout has further avoided or minimised impacts to native vegetation, habitat and bird and bat species.

Specifically, further survey effort and revision of the Project layout have provided the following benefits to biodiversity values in the Project area:

- Further reduction of direct impacts on native vegetation including:
 - Impacts to PCT 164 have reduced by 206.31 ha;
 - Impacts to PCT 163 have been reduced by 153.11 ha;
- Elimination of impacts to the following species credit species:
 - Slender Darling Pea (*Swainsona murrayana*);
 - Little Eagle (*Hieraaetus morphnoides*); and
- Elimination of impacts to PCT 26, PCT 44, PCT 160 (i.e., these no longer occur in the Disturbance Footprint).

5.4.1.2 PRESCRIBED IMPACTS

TABLE 5-8 PUBLIC SUBMISSIONS REGARDING TO THREATENED SPECIES

Submitter ID	Example Text from Submission
S-72260956	"Keri Keri Wind Farm - on the Murray River Tributary Catchments, including Vital Wetlands for Local and Internationally Protected Migratory Birds, unprotected in Australia, yet under Agreements with International Countries. Needs an Inquiry Now. ... Cease and Desist Keri Keri Wind Farm PROPOSAL Immediately Immediately. Because we Love them, All Birds that Fly at all altitudes, up to 483m above the Land to 0m on Land including Eagles, Masters of the Sky, under Threat from 3 Bladed Too High Too Wide Blades/Turbines, named Sky Machetes by Bird Lovers, So Very Concerned for Birds and Bats that have No Protection Internationally from 3 Bladed Wind Turbines, yet are Endangered, Critically Endangered, and Even More so now, from now, as Wind projects Accumulate Cumulative Impacts into Sky Habitats."
S-72252707	"The animals that will be displaced and killed by this installation will be astronomical the birds with the turbine blades and the smaller creatures that won't want to live next to infrasound generated. The endangered Mallee fowl to mention only one of many."
S-72245714	"This project is occupying a large amount of farm land. The turbines have a huge environmental impact themselves. The wildlife noise will displace. The birds life especially raptors ie, the wedge tailed eagle & the whistling kite . Raptors eye are towards the ground looking for prey. These bird are in great danger from the Blades which will cause certain death."
S-72271719	"The Keri Keri Wind Farm will slaughter iconic birds and bats, over a 50 km area, 24 hours a day. It will be very detrimental to the local ecology. Particularly decimate protected Wedge Tail Eagles."

Submitter ID	Example Text from Submission
S-72268715	"I have a big concern with this project and its location being in the flight path of the endangered Australasian Bittern. This bird travels to the south of Keri Keri to the rice fields. This is only one species of many that travel south to the rice fields every year and this wind farm will cause a threat to the birds life."

The BAM, which guided the preparation of the BDAR, requires the assessment of prescribed impacts. Prescribed impacts include the potential for bird and bat species to collide with WTG blades.

In assessing prescribed impacts on bird and bat species, the Applicant undertook extensive survey, recording of bat calls, modelling and analysis. This included a collision risk assessment for species identified flying within the rotor swept area, including the Wedge-tailed Eagle (*Aquila audax*), Fork-tailed Swift (*Apus pacificus*), various other raptor, cormorant and Corvidae species. The CRA concluded that potential mortality for all raptor, cormorant and Corvidae species, annual mortality would not be significant. Mortality numbers are considered worse case.

The Amended Project was informed by the location of recorded nests and habitat for threatened, migratory and common bird and bat species. Project amendments have considered data collected during BUS.

The potential risk of wind turbine strike on bird and bat species will be mitigated by implementing a BBAMP, the details of which were presented in s6.1.5.3 of the EIS. The framework BBAMP has been updated to consider additional survey effort as well as the revised Project layout.

5.4.2 NOISE

TABLE 5-9 PUBLIC SUBMISSIONS REGARDING INFRASOUND CONCERNS

Submitter ID	Example Text from Submission
S-72245714	"I will mention the Infrasound that is said no living thing wants to live within 30 km of. This is causing health issues with surrounding neighbours ."
S-72268715	"Wind turbines also generate infrasound that effects the behavior of other native animals."
S-72260956	"Do you Know How many farmers have Left their Properties due to Infrasound from Wind Turbines/Farms with 3 Blades. Cease and Desist 3 Bladed Wind Turbines/Farms Now."
S-72267728	"Continuing to run infrasound & microplastic free Merino sheep for meat/wool & cattle grazing on uncontaminated native rangelands & utilising cropping land is the healthy, Australian benefiting priority!"

Infrasound is sound frequencies below 20 Hz, which is often described as inaudible to humans; however, if the sound level is sufficiently high, infrasound can be audible to humans. In the Noise Impact Assessment (NIA) that informed the EIS, the C-weighted scale was standardised to determine the potential for human perception and annoyance due to low frequency noise. The Wind Energy: Noise Assessment Bulletin (2016) (Bulletin) sets an audibility threshold for low frequency noise of 60 dB(C). The NIA concluded that no dwellings would be subject to low frequency noise above 60 dB(C).

It should be noted that early WTGs were constructed with blades located downwind of the tower. These turbines produced significant levels of infrasound because of the wake caused by the tower. Modern WTGs are constructed with the blades upwind of the tower, resulting in infrasound levels well below the level of perception at residential dwelling setback distances.

Recent studies relating to the level of infrasound produced by wind turbines confirm that the level of infrasound from wind turbines is no greater than the noise encountered from other natural and non-natural sources. Almost all mechanically operating equipment emits infrasound, for e.g., motor vehicles, refrigerators, mobile phones.

A 2013 study on infrasound produced by the South Australian EPA concluded that:

- The measured levels of infrasound from wind farms are well below the threshold of perception;
- The measured infrasound levels around wind farms are no higher than levels measured at other locations where people live, work and sleep; and
- The characteristics of noise produced by wind farms are not unique and are common in everyday life.

Note also that in the Technical Supplement for Noise Assessment (DPHI, 2024b) which replaced the Bulletin, does not required applicants to assess infrasound. This is based on findings of the National Health and Medical Research Council in 2015 which concluded that:

"There is no direct evidence that exposure to wind farm noise affects physical or mental health, and there is currently no consistent evidence supporting a link between wind energy projects and adverse health outcomes in humans."

The Noise Impact Assessment has been updated to consider the amended Project and include additional commentary regarding infrasound.

5.4.3 VISUAL

5.4.3.1 IMPACTS ON VISUAL AMENITY TO PRIVATE DWELLINGS

TABLE 5-10 SUBMISSIONS REGARDING VISUAL IMPACTS TO PRIVATE DWELLINGS

Submitter ID	Example Text from Submission
S-71214456	"- adverse impact on non-associated surrounding landowners property values is unacceptable. No recent studies to suggest otherwise especially based on the proposed turbine heights."

The LVIA concluded that there are limited opportunities to view the Project from non-associated dwellings within 8 km of the Project. Of the 13 non-associated dwellings identified within 8 km of the Project, 11 were deemed to have the potential for negligible – low visual impact. Two non-associated dwellings were deemed to have the potential for moderate visual impact. Mitigation measures were proposed for these two dwellings including landscape and visual screening.

However, the Addendum LVIA prepared to assess the revised Project layout and, where necessary, addresses relevant submissions concluded that impacts are reduced with the amended Project.

5.4.3.2 BROADER LANDSCAPE CONCERNS

TABLE 5-11 SUBMISSIONS REGARDING BROADER LANDSCAPE CONCERNS

Submitter ID	Example Text from Submission
S-71214456	"The visual impact of these wind turbines will be unthinkable - this is not what we want in Country NSW, in our backyard."
S-71457956	"Destruction of food producing land, visual destruction of landscape"
S-71566799	"i object to this Wind farm.It will be an ugly sight on our beautiful countries landscape."
S-72157036	"- Cummulative effect of landscape impacts . Australia landscapes are having their natural character and beauty ruined."
S-71566818	"I Object. Ugly wind turbines which can be seen for many km in every direction."

The visual impacts on the landscape character were assessed in the Landscape and Visual Impact Assessment (LVIA) that informed the EIS (Appendix K of the EIS) and updated in the Addendum LVIA (Appendix G of the Amendment Report). The LVIA assessed four landscape character units and concluded that the Project would not disrupt the key landscape features of any. Similarly, 13 public viewpoints were assessed, and none were determined to have a high visual impact, four were determined to have the potential for medium visual impact and seven were determined to have the potential for low visual impact.

The LVIA concluded that, although the Project will be a visually prominent element in the landscape, views to key scenic or landscape features will not be impacted because the predominant character of the region is defined by highly modified lands of low scenic quality. Once operational, the Project will allow the continuation of existing agricultural activity, in addition to adding another land use, i.e., wind energy production. Similar conclusions were drawn in the Addendum LVIA; however, landscape and visual impacts are generally reduced by the removal of 41 turbines.

It is also important to note that visual impact of the Project will vary greatly depending on the individual viewer's sensitivity to and acceptance of change. The sensitivity towards change varies greatly depending on the user's connection with the landscape. For example, visitors to the area may perceive the wind farm as an interesting feature of the landscape, which is otherwise defined by flat, large expanses that lack key features. This may contrast with a resident who passes the wind farm daily who may have a more critical perception of the visual presence of the wind farm.

5.4.4 SOCIAL AND ECONOMIC

TABLE 5-12 PUBLIC SUBMISSIONS REGARDING SOCIAL AND ECONOMIC CONCERNS

Submitter ID	Example Text from Submission
S-71566782	"- Affecting our livelihoods and our rights as land holders"
S-72230210	"The turbines are toxic & ruin our environments natural habitat & community livelihoods."
S-72267480	"I strongly object to this proposal. ... - adverse cumulative impacts on agricultural production/land in the REZ - adverse cumulative impacts on tourism in the REZ ... - adverse impact on non-associated surrounding landowners property values is unacceptable. No recent studies to suggest otherwise especially based on the proposed turbine heights."
S-72272713	"The impact on our local infrastructure would be immense, and the long-term maintenance costs could burden our community. Please consider these serious infrastructure concerns and oppose the development plan."

The Project will generate up to 650 full time equivalent (FTE) jobs during construction. The Economic Impact Assessment (Gilespeie, 2025) estimates that this will generate about \$217 million in direct and indirect output to the regional economy, and more than \$340 million in direct and indirect output to the NSW economy. This will not only create local employment opportunities but has other benefits in boosting the local and regional economy. The construction workforce will spend locally, generating higher economic activity at local restaurants, shops and businesses. The Applicant is committed to hiring locally, where practicable and where the relevant skills are available.

The Project will also create significant local procurement opportunities for goods and services during construction and operation. The Applicant will engage regularly with business chambers and regional businesses to inform them of goods and services required for the Project.

During construction, the Applicant will monitor labour, goods and services metrics to understand shortages and competitive pressures that may arise and as needed, implement actions to limit these pressures. Mechanisms to manage the social and economic benefits and impacts that may result from the Project will be detailed in the relevant management plan.

A CBF will be established between the Applicant and Council. A portion of the CBF will be formalised via a Planning Agreement and will be administered by Council. The financial commitment for the CBF to be made by the Applicant will be in line with the Benefit Sharing Guideline (DPHI, 2024c).

Submissions also raised concerns that the Project would adversely affect property values. This has been a common theme in submissions received for wind energy projects throughout NSW and Australia.

There have been several independent studies commissioned to investigate if wind farms affect property values. Early Australian studies were limited by available data; however, a study that focussed on Crookwell Wind Farm, assessed 78 property sales between 1990 and 2006 and found no reduction in property values attributable to the wind farm. This theme is prevalent in more recent studies that conclude that the data does not demonstrate that wind farms significantly impact property values.

Data available from the NSW Valuer General shows that rural property values in the Murray River LGA rose by 44% between 2021 and 2025, commensurate with a period when there was significant wind farm development activity in the region.

5.4.5 TRAFFIC

TABLE 5-13 PUBLIC SUBMISSIONS REGARDING ROADS CONSTRUCTION CONCERNS

Submitter ID	Example Text from Submission
S-71572476	"Objection. This construction will not be in any way environmentally friendly. Removal of native wildlife and habitat for roads and contruction"
S-72252707	"The turbines have a huge environmental impact themselves. ... The embedded cost of this aren't calculated The cement, the transport by Diesel trucks, The large access roads that need to be made."

Since exhibition of the EIS, the Applicant has amended the Project in several ways that directly reduce potential traffic and transport impacts, including:

- Revised transport route, eliminating the use of the transport route from Newcastle and, instead, relying on the route from the Port of Adelaide, which has been assessed from the Victorian/NSW border;
- Optimisation of potential road upgrades from Robinvale to the Project site;
- Reduction in the number of site access points from four to two; and
- Optimisation of internal access tracks.

This has reduced the impacts associated with traffic and transport.

A Construction Traffic Management Plan (CTMP) will be developed to outline the mechanisms to mitigate and manage the impact of construction traffic and to ensure road and pedestrian safety. The CTMP will be developed in consultation with Murray River Council and TfNSW.

The CEMP will include:

- Requirements for temporary traffic signage at identified intersections along the transport route;
- Carpooling protocols to reduce daily light vehicle trips;
- Specific on-site safety measures, including site access;
- Scheduling for heavy vehicle/OSOM deliveries so that, where possible, these occur outside of peak travel times;
- Driver protocols;
- OSOM vehicle operating protocols;
- Information relating to road safety to be provided to all staff;

- Consultation with neighbours (along the transport route) and local authorities regarding delivery of OSOM plant;
- Regular road dilapidation surveys and reporting to ensure the road network is maintained in a safe condition; and
- Suitable signage provided to advise road users.

5.4.6 SOIL AND AGRICULTURE

TABLE 5-14 SUBMISSIONS REGARDING LOSS OF AGRICULTURAL LAND AND PRODUCTIVITY

Submitter ID	Example Text from Submission
S-71214456	"Agricultural land should not be used for these projects. We cannot afford to lose any of our food land."
S-71457956	"Destruction of food producing land"
S-72245714	"This project is occupying a large amount of farm land."
S-72256462	"This installation does not belong on productive farmland. The food security of Australia is under threat."
S-72267480	"I strongly object to this proposal. - adverse cumulative environmental impacts in the REZ - adverse cumulative impacts on agricultural production/land in the REZ"
S-72233958	"This project consumes a large amount of agricultural land that can never be repurposed for cropping or Irrigation or any type of improvement whether it be habit and vegetation or farming and food."
S-71570708	"This project is using irreplaceable agricultural land, land that is used for food and fibre production, threatening our future food security." "It is due to these so-called renewable energy projects that rural NSW farmers are being expected to host these repulsive 500Kv Transmission Lines that restrict the land owners ability to farm around them."

The NSW Government has introduced a range of measures designed to provide greater protection to agricultural land from development. This includes biophysical strategic agricultural land (BSAL) and critical industry clusters (CICs).

BSAL is land that is considered critical to sustaining the States agricultural industry. Over 2.8 million ha of land across the State has been mapped as BSAL and includes land identified with high quality soil and water resources capable of sustaining high levels of productivity. The Project area does not contain any areas mapped as BSAL.

CICs are concentrations of highly productive, inter-related industries within a region that contribute to the identity of that region and provide significant employment opportunities. Examples include CICs for the viticulture industry and the equine industry.

Other mechanisms introduced to protect agricultural land and productivity include the Aquifer Interference Policy, and the introduction of guidelines and technical notes to guide the preparation of agricultural impact statements for SSD applications.

The Agricultural Impact Assessment (AGIA) that informed the EIS (Appendix Q of the EIS) was prepared in accordance with these guidelines. The AGIA assessed the potential impact from the Project on agricultural productivity within and surrounding the Project area, and in throughout the region. The AGIA concluded that potential impacts from the Project on agricultural productivity will largely be temporary.

Agricultural production, particularly livestock grazing, and wind farms can coexist. Livestock grazing can continue unhindered during operation. During construction, grazing can continue; however, there are generally some interruptions. While grazing and wind farm construction can occur simultaneously, the landowner across most of the Project area has opted to destock his entire property for the duration of construction. This has inflated the potential construction impacts.

The revised Project layout has resulted in a 27% decrease (from the EIS project) in the temporary Disturbance Footprint, and the permanent Disturbance Footprint has decreased by 14%. These revisions have resulted in a decrease in potential impacts on agricultural land and agricultural productivity. Considering the revised permanent Disturbance Footprint of 491 ha, this represents 2.7% of the Project area that will be impacted.

The development of the Project will provide significant benefits to the host landowners and local and regional agricultural production. The Project will improve accessibility to agricultural lands within and adjacent to the Project area through external road and internal access track upgrades. The Project will also benefit the regional economy, most of which is focussed on agricultural productivity. Payments made by the Applicant to host landowners will benefit agricultural activities within the Project area, with flow on effects to the local and regional economy. The Applicant will work with local communities to identify opportunities for long-term benefits.

When considering the potential overall effect of the Project on agricultural land and productivity, the potential impacts are outweighed by the potential benefits. For example:

- The potential operational impacts represent 3.8% of the total Project area, and an insignificant area in the regional landscape;
- Agricultural practices can continue during both construction and operation;
- Biosecurity risk will be managed during construction, and construction of the Project should decrease biosecurity risk (e.g., upgraded site and internal access, operating protocols); and
- Financial contributions made by the Applicant (e.g., payments to host landowners,) will provide significant benefits to the local and regional economies.

The AGIA concluded that there would be no significant change to the existing agricultural land use and productivity at the local, regional and state scale.

5.4.7 WATER RESOURCES

TABLE 5-15 SUBMISSIONS REGARDING IMPACTS TO WATER RESOURCES

Submitter ID	Example Text from Submission
S-72225707	"The turbine blades spread Bisphenol A all over the countryside, washing into our waterways, then will be consumed by livestock entering our food chain. Resulting in human consumption."
S-72267480	"I strongly object to this proposal. ... - Bisphenol A toxic cancer causing Microparticles flaking off turbine blade resin & pollution our water & land, contaminating food & water supplies."
S-72267728	"that will shed toxic Bisphenol A (lethal to young children & as toxic as blue asbestos) throughout Australia's RU1 Primary Production Land - cursing our healthy air quality, life sustaining soil, water"
S-72272713	"The construction of these turbines would necessitate extensive road building and other supporting infrastructure in previously untouched wilderness areas. This would not only lead to habitat destruction but also increase the risk of soil erosion and water contamination."

Turbine blades are made from a mixture of composites, primarily epoxy glue, glass and carbon fibres. Since wind turbines are designed to operate under harsh conditions over their lifetime (~30 years), the blades are designed to resist material erosion.

During the lifetime of a WTG blade, very small quantities of blade material may wear away from the leading edge of the blade due to erosion caused by rain and dust particles. It is estimated that less than 50 grams of material may erode annually from a large WTG blade (Mishnaevsky L., 2024), a negligible amount compared to the blade weight (23 tonnes). Any material that is eroded would consist of fully cured paint particles, which are chemically inert.

Wind turbine blades are also continuously monitored and maintained throughout operation to reduce leading edge erosion and minimise impacts to the environment.

5.4.8 AIR QUALITY, GREENHOUSE GAS EMISSIONS

TABLE 5-16 SUBMISSIONS REGARDING IMPACTS TO AIR QUALITY

Submitter ID	Example Text from Submission
S-72267728	"Toxic Contaminating Wind Turbine Monstrosities[...] cursing our healthy air quality..."

Dust is the main particle of concern to air quality during construction. Mitigation and management of potential impacts to air quality dust to dust liberated during construction will be included in the Construction Environmental Management Plan (CEMP). These were also included in s6.10.5 of the EIS. Mitigation and management measures will include application of water to exposed surfaces to suppress dust generation.

5.4.9 HAZARDS

5.4.9.1 BUSHFIRE

TABLE 5-17 SUBMISSIONS REGARDING IMPACTS TO BUSHFIRE

Submitter ID	Example Text from Submission
S-72271719	"Rural Australia is known as one of the most bushfire prone areas on Earth. Scattering tens of thousands of wind turbines (individually known to catch fire occasionally and the older they get the more likely it is to happen) on 250m high towers across the Countryside. This must increase the risk of a fire starting from a Wind Turbine 100,000 times. The risk will encompass all rural landholders, country towns and rural cities. Everybody will be in danger and on tenterhooks, every Total Fire Ban Day. The danger of a fire reaching serious proportions, is greatly increased as the Wind Turbines, physical height, (250m), blade diameter and created wind turbulence, stops any arial water bombers operating within 5km to 10km of any Wind Farm. This would mean any fire started by malfunctioning wind turbine, would reach major proportions before any attempt could be made to control it. The loss of life, loss of livestock, wildlife and property has potential to be huge."
S-72268715	"Apart from the environmental effect to wild life there is also the treat of bush fires caused by malfunctioning turbines which affects neighboring properties and the local volunteers in the CFA."

Potential impacts to first responders for a bushfire were addressed in s6.7.1 and s6.7.4 of the EIS. In summary, aerial operators were engaged during the preparation of the EIS and, while general concerns were raised, all operators accepted that as standard practice they would assess WTGs as a potential hazard to aircraft operations and alter their operations as necessary. Similarly, both NSW NPWS and RFS were engaged during the preparation of the EIS to discuss potential issues relating to communication links and firefighting. Regarding firefighting, both agencies specified the need to work with them to develop a management plan that provides measures to minimise impacts to aerial firefighting. No issues were raised regarding communications links.

In agency advice provided by NSW RFS, it was noted that the bushfire mitigation measures proposed in the Bushfire Risk Assessment that accompanied the EIS (Appendix N of the EIS) were acceptable. This includes the preparation of a Bushfire Emergency Management and Operations Plan (BEMOP), which will consider aerial firefighting requirements.

Aerial firefighting operators would treat WTGs like other tall structures that are commonly found throughout the landscape (e.g., high voltage transmission lines, telecommunications towers).

In designing the Project, the Applicant has considered bushfire risk. Asset protection zones are included around all infrastructure and will be appropriately maintain during operations. A water supply of no less than 20,000 L will be provided for property protection and as a static water supply for emergency services.

Upgraded and new access tracks within the Project area, as well as updates site access point will provide greater and easier access to the Project area. New roads will be all-weather access and of adequate width to enable firefighting vehicles to access and manoeuvre. The Project will also require upgrades to the intersection of Keri Keri Road and the Sturt Highway, as well as sections along Keri Keri Road. This will facilitate better access to the eastern perimeter of the Yanga State Conservation Area.

5.4.9.2 HEALTH

TABLE 5-18 PUBLIC CONCERNS REGARDING POTENTIAL HEALTH IMPACTS

Submitter ID	Example Text from Submission
S-72169983	"It is on prime food producing land and the risk is too high for potential of irreversible toxic contamination."
S-72225707	"As a young farmer in the area I am concerned about this installation. My concerns are for my health, my families, the people who live in my community and future generations of food producing farmers. I have been reading about BPA and that it was banned in Australia in 2012. The turbine blades spread Bisphenol A all over the countryside, washing into our waterways, then will be consumed by livestock entering our food chain. Resulting in human consumption. I am unsure of the true implications of Bisphenol A. I am considering obtaining Legal advice as to the health implications upon myself, my family, and my community. I do not consent to being exposed to Bisphenol A."

Concerns regarding Bisphenol A (BPA) were addressed in s5.4.6 of this report.

In short, while some studies indicate that microscopic traces of residual BPA may be present in the coatings of WTG blades and weathering could potentially cause some minor releases of these, claims of significant 'emissions' of BPA from WTG blades are not supported by evidence.

5.4.9.3 BLADE THROW AND TURBINE FIRE

TABLE 5-19 PUBLIC SUBMISSIONS REGARDING BLADE THROW

Submitter ID	Example Text from Submission
S-72157036	"I object to the proposed cluster of industrial structures proposed in submission (sub-72169456). My reasons for objecting are as follows: - Wind turbines are a significant fire risk being a source of fire ignition and also the source of fire spread via "blade throw" occurring in the event of a structural failure in the blade."

The Preliminary Hazard Analysis (PHA) that informed the EIS concluded that the potential risk of injury or property damage from WTG blade throw is low. Based on published evidence, the likelihood of a blade throw event occurring is very low. The Applicant also has significant wind data from the site and has analysed wind direction, which confirms that the most common orientation of the WTG blades of turbines of concern will be parallel to the Sturt Highway or oriented 120° to 300°. At these orientations, risk to receivers or those using the Willows Rest Area on the Sturt Highway is considered negligible.

The PHA stated that the non-associated dwellings 19 and 99 were the closest to a Project WTG; however, the assessment concluded that no risk contours (in accordance with HIPAP No. 4) overlapped these (or any other) non-associated dwellings. The revisions made to the Project layout since the exhibition of the EIS have increased the distance of these non-associated dwellings to a Project WTG to over 2 km and, therefore, these properties are not at risk from blade throw.

The PHA stated that the frequency of turbine fires is extremely low, approximately 0.00017 to 0.00058 fires per WTG per year. Notwithstanding, there is a remote chance that a turbine nacelle may ignite (e.g., from lightning strike, electrical malfunction). In the event of a turbine fire, in-built mechanisms would immediately (or perhaps prior to) shut down the WTG; therefore, a flaming blade throw is not considered likely. The first commercial wind farm in Australia entered operation in 1987. In the 38 years since, there have only been 7 recorded fires at wind farms in Australia.

The Australian and New Zealand National Council for fire and emergency services (AFAC, 2018) and the Clean Energy Council (CEC, 2017) have each published learnings from wind farm emergency management procedures and protocols, including:

- Wind farm access tracks are beneficial in helping fight bushfires on the ground, and provide an effective firebreak;
- WTG did not present a hazard to aerial firefighting. Turbines are clearly visible to pilots; however, transmission infrastructure and meteorological masts were more difficult to see and pose a safety risk;
- Precautionary measures should be considered to allow for aerial identification of meteorological masts, their guywires, and transmission infrastructure;
- The maximise airspace for aerial firefighting between turbines, turbines should be locked in the 'Y' position;
- Communication protocols between wind farm operators and fire and land management agencies will improve emergency response; and
- Wind farm operators should have the capacity to respond to emergency events.

5.4.10 CUMULATIVE IMPACTS

TABLE 5-20 SUBMISSIONS RAISED IN OBJECTION TO CUMULATIVE IMPACTS

Submitter ID	Example Text from Submission
S-72265956	"I believe the costs far outweigh the benefits of ANY large-scale wind project, particularly when the cumulative and combined impacts are measured, assessed and considered."
S-72260956	"...Wind projects Accumulate Cumulative Impacts into Sky Habitats."
S-72267480	"I strongly object to this proposal. - adverse cumulative environmental impacts in the REZ - adverse cumulative impacts on agricultural production/land in the REZ - adverse cumulative impacts on tourism in the REZ"

The EIS for the Project considered the cumulative impacts of 19 relevant developments including projects undergoing assessment, under construction and operational. These projects were located between 0 and 150 km from the Project and included wind energy, solar energy, and transmission projects.

Since exhibition of the Project EIS the cumulative impacts assessment has been updated to consider:

- The status of the following projects has changed from 'Prepare EIS' to 'Assessment':
 - Baldon Wind Farm;
 - Bullawah Wind Farm;
 - Dinawan Wind Farm;
 - Junction Rivers Wind Farm;
- The status of the following projects has changed from 'Prepare EIS' to 'Response to Submissions':
 - The Plains Wind Farm;
 - Tchelery Wind Farm;
- Pottinger Wind Farm has changed status from 'Prepare EIS' to 'Determination';
- Romani Solar Farm has been withdrawn and replaced by Romain BESS, for which the EIS is currently on 'Exhibition';
- The following projects have been added to the cumulative impact assessment;
 - Abercrombie Wind Farm;
 - Koorakee Energy Park;
 - Euston Wind Farm;
 - Wanganella Wind Farm;
 - Conargo Wind Farm; and
 - Saltbush Wind Farm.

Section 6.6 of the Amendment Report provides an updated cumulative impact assessment.

6. PROJECT JUSTIFICATION AND EVALUATION

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.

6.1 PROJECT EVALUATION

6.1.1 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, et al., 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, including:

- 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 2.6 million t CO₂-e 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;
- Project Layout amendments that have further avoid and minimise environmental and social impacts and maximised 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
- Minimisation of potential impacts and appropriate management and/or offset of residual impacts 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.

6.1.2 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 reduced 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.

6.1.3 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, in their agency advice, 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 6-1), 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 agency advice has been responded to as outlined in **Section 4** 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.

6.1.4 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 has:

- 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;
- Optimisation of electrical reticulation, including:
 - Eliminating 64.5 km of 33 kV overhead transmission;
 - Increase in the length of 33 kV underground transmission by 81.2 km;
 - Decrease in the length of 330 kV overhead transmission by 3.83 km;
- Reduction in the number of proposed 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 6-1 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 6-1 SUMMARY OF UPDATED EVALUATION OF THE AMENDED PROJECT

Aspect	Outcome of Assessments
Biodiversity	The amended Project has led to further significantly avoidance of impacts to native vegetation and threatened species and communities, including and SAI entities. Specifically, the amended Project has: • Avoided a further 366.07 ha of native vegetation by eliminating any impacts to PCT 26, PCT 44 and PCT 160; • Reduced ecosystem offset credit liability by 18,354 credits; • Avoided threatened species and threatened species' habitat, including: ◦ Fully avoided impacts to the Slender Darling-pea (<i>Swainsona murrayana</i>) and Little Eagle (<i>Hieraaetus morphnoides</i>); ◦ 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 • Commensurately, the species offset credit liability has reduced by 118,153 credits. The updated mitigation and management measures in the Amended BDAR reflect the Applicant's commitment to conserve biodiversity.
Aboriginal Cultural Heritage	The amended Project has resulted in a reduction in impacts on Aboriginal cultural heritage. Specifically, the number of identified sites that may be subject to direct impacts has been reduced from 13 to one (KK-046, an isolated artefact). 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 to Aboriginal cultural heritage when amending the Project layout.
Aviation	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.

Aspect	Outcome of Assessments
Noise	Operation of the Project WTGs will not result in exceedance of 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. No noise impacts are expected at the Willows Camp Ground within Yanga State Conservation Area. 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.
Visual	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).
Soils and Agriculture	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. 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. Any loss of agricultural productivity 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 any potential impacts to land, soil and agricultural productivity (which were negligible for the EIS project).

Aspect	Outcome of Assessments
Water Resources, Hydrology and Flooding	The amended Project has been assessed for impacts on and due to local hydrology and flooding. The updated assessment has concluded that: - Local overland flows traversing the Project area are of low velocity; - There is only low hazard (H1 to H3) in areas affected by Abercrombie Creek flow path; - Potential flood impacts caused by the development of the Project are considered non-detrimental; - 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 PMF event, while small areas may experience 1-2 m water depths and H4 hazard during a PMF event; and - Breakout flows from the Murrumbidgee River do not affect water levels or flood risk within the Project area during extreme flood events. Emergency management procedures may be required to mitigate risks associated with access or isolation during flood events.
Traffic	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.
Telecommunications	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.

7. REFERENCES

CEC, 2025. *Recycling the future: sustainable solutions for renewable energy technologies*. [Online]

Available at: <https://cleanenergycouncil.org.au/for-consumers/fact-sheets/recycling-get-the-facts/recycling-wind-turbines-solar-panels-batteries>

CSIRO, 2022. *GenCost 2022-23: Consultation draft*. [Online]

Available at: <file:///C:/Users/elohanna.levi/Downloads/EP2022-5511.pdf>

CSIRO, 2023. *The question of nuclear in Australia's energy sector*. [Online]

Available at: <https://www.csiro.au/en/news/all/articles/2023/may/nuclear-explainer>

CSIRO, 2025. *GenCost 2024-25*, s.l.: CSIRO.

DPE, 2024. *Significant Development Guidelines – Preparing a Submissions Report, Appendix C to the State Significant Development Guidelines*., s.l.: NSW DPE.

DPHI, 2024a. *Wind Energy Guideline*, s.l.: s.n.

DPHI, 2024b. *Technical Supplement for Noise Assessment*, s.l.: s.n.

ERM, 2024. *Keri Keri Farm Environmental Impact Statement*, Sydney NSW: Environmental Resources Management Australia Pty Ltd.

ERM, 2025. *Keri Keri Wind Farm Amendment Report*, s.l.: s.n.

ERM, 2025. *Keri Keri Wind Farm Amendment Report*, s.l.: s.n.

NASA, 2025. *Do scientists agree on climate change?*. [Online]

Available at: <https://science.nasa.gov/climate-change/faq/do-scientists-agree-on-climate-change/>



APPENDIX A SUBMISSIONS REGISTER

Submission ID	Position	Location	Economic, environmental and	Biodiversity	Aboriginal Cultural Heritage	Historic Heritage	Noise	Landscape and Visual	Soils and Agriculture	Water Resources, Hydrology and Flooding	Traffic	Preliminary Hazard Analysis	Bushfire	Economic	Air Quality	Waste Management	Social	Supply Chain Issues	Health	Cumulative Impact	Project	Layout and design	Location of Project	Services and Utilities	Uses and activities	Description	Decommissioning	Foreign Ownership	Justification and Evaluation	Plans, policies and guidelines	Ecological sustainable development	Renewable Energy	Supply Chain Impacts	Procedural matters	Level or quality of engagement	Compliance with the SEARS	Identification of relevant statutory requirements	Level or quality of assessment	Beyond scope of the Project	Broader policy issues or not relevant to the Project
Special Interest Groups																																								
SE-72214976	Support	Rossmore, New South Wales																																						
SE-72004465	Object	Hay South, New South Wales																																						
SE-72241956	Object	Gulgong, New South Wales																																						
Public Submissions																																								
SE-71204468	Support	Sydney, New South Wales																																						
SE-71214457	Object	Kanya, Victoria																																						
SE-71458206	Object	Leeton, New South Wales																																						
SE-71565735	Object	Cunninyeuk, New South Wales																																						
SE-71566783	Object	Mallan, New South Wales																																						
SE-71566789	Object	Swan Hill, Victoria																																						
SE-71566819	Object	Cunninyeuk, New South Wales																																						
SE-71570709	Object	Cunninyeuk, New South Wales																																						
SE-71572235	Object	Swan Hill, Victoria																																						
SE-71572477	Object	Moulamein, New South Wales																																						
SE-72003966	Object	Hay South, New South Wales																																						
SE-72157037	Object	Chatham Valley, New South Wales																																						
SE-72169984	Object	Goovigen, Queensland																																						
SE-72225708	Object	Barham, New South Wales																																						
SE-72230211	Object	Mallan, New South Wales																																						
SE-72233959	Object	Gannawarra, Victoria																																						
SE-72241958	Object	Gulgong, New South Wales																																						
SE-72242707	Object	Gulgong, New South Wales																																						
SE-72245715	Object	Barham, New South Wales																																						
SE-72252708	Object	Swan Hill, Victoria																																						
SE-72256463	Object	Moulamein, New South Wales																																						
SE-72260957	Object	Guyra, New South Wales																																						
SE-72265957	Object	Coolah, New South Wales																																						
SE-72267481	Object	Yarrabin, New South Wales																																						
SE-72267729	Object	Lake Albert, New South Wales																																						
SE-72267979	Object	Warrawee, New South Wales																																						
SE-72268716	Object	Barham, New South Wales																																						
SE-72271474	Object	Traynors Lagoon, Victoria																																						
SE-72271709	Object	Upper Lansdowne, New South Wales																																						
SE-72271720	Object	Wangarratta, Victoria																																						
SE-72272714	Object	Moulamein, New South Wales																																						



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