



18 September 2024

**ATTENTION: Department of Planning, Housing & Infrastructure**

**PROJECT: Bullawah Wind Farm | SSD-50505215**

**Re: Submission for Exhibition for State Significant Development Application | Bullawah Wind Farm (SSD- 50505215)**

Please find below the submission from Edward River Council in relation to the Environmental Impact Statement (EIS) and supporting information for the Bullawah Wind Farm development (SSD-50505215).

**Impact on Flora and Fauna**

The Project is proposed within an area of rich flora and fauna where biodiversity values, habitats and environments extending into the Edward River council area. The EIS states the project has potential to cause Serious and Irreversible Impacts (SAII) on species which includes the critically threatened Plains Wanderers *Pedionomus torquatus*. Significant consideration should be given to the immediate, cumulative, and unknown impacts on existing habitats, corridors, and potential alienation; and the flow-on effects that extend beyond the Project footprint for all flora and fauna

**Presence of Cultural Heritage**

Thorough consideration should be given to the presence and findings of significant Aboriginal Cultural Heritage items, including relics, artefacts and burial sites within the project and surrounding areas, and where these culturally significant areas extend into the Edward River area. The appropriate management, consultation and processes should be carried out during the construction and ongoing operation of the project to ensure that the immediate and surrounding Local Indigenous Communities are adequately consulted, and places of cultural significance are appropriately protected

**Visual and Landscape Impact**

The cumulative impact of the wind farm development and surrounding renewable projects should be thoroughly considered, having regard for the immediately affected landholders and the wider community.

**Impact on Road Infrastructure**

Specific detail on the source location of construction materials and proposed haulage routes , is important noting that this may impact on the local roads and local traffic movements through affected Local Government Areas (LGAs). Where impact is identified details of any proposed alteration to traffic movements, upgrade works and maintenance works agreements should be negotiated.

**Accommodation and resources**

Consideration should be given regarding the proposed workforce during construction, operation and during decommissioning. The EIS identifies approximately 350 direct and 560 indirect jobs during peak construction. The location of the on-site accommodation will need to be considered to ensure the accommodation camp/s are well-located, and are outside hazard areas (flood, bushfire, etc) where possible. Consideration and planning for adequate services, including stormwater and runoff, on-site sewage management systems, potable water supply, electricity connection, firefighting provisions and the like will need to be provided to ensure the development has appropriate services given the remote locality of the Project.

**Bushfire**

Bushfire risks associated with the construction and operation of the development are very generally covered in the EIS. Of specific concern is the Bushfire Prone Land areas consisting of large expanses of grassland and the remoteness of these areas. Adequate resources would be required to protect these areas and the properties of adjoining landowners in the event of fire outbreak. The availability of adequate resources, available fire personnel and response times due to travel distances, could be catastrophic in the event of a fire outbreak. A site-specific plan should be provided for consideration.

**Waste management**

Greater detail on proposed arrangements for the management of waste from the construction activities and the accommodation camps needs to be provided. Waste facilities capable of receiving the type and volume of waste that may be generated may be located some distance from the site and may impact on local and regional roads.

Yours faithfully



Marie Sutton  
Manager Development Services

