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Dear Ms. Bandaruk,

### **URALLA SHIRE COUNCIL RESPONSE TO AMENDMENT REPORT – WINTERBOURNE WIND FARM**

Council lodged an objection to the original EIS due to the applicant's deficient response in several areas. This submission provides comments on the amendment report, which addresses nearly all the issues raised and is a significant improvement.

#### Cumulative Impacts of the Project on Council and Community

Many of the issues raised in USC's original submission about the cumulative impacts of multiple generator projects are now being addressed in a coordinated way by EnergyCo. We urge the applicant to consider region-wide studies on workforce and skills training, and accommodation currently being undertaken by EnergyCo. There are multiple opportunities, particularly concerning road upgrades, transport routes, and workforce accommodation, for a coordinated approach.

The cumulative impact assessment in the amendment report has not considered Ace Power's Hillview Energy Hub, EnergyCo's transmission project, or ACEN's New England Solar (NES) Stage 2 and Deeargee Solar Farms. These projects are the closest to the subject site and will likely use similar transport routes, particularly the Staces Road–TSR thoroughfare. This is an oversight.

Council has successfully negotiated a Voluntary Planning Agreement (VPA) with the applicant, which will provide ongoing community benefit payments for the life of the project.

#### Social Impact Assessment

##### *Workforce and Accommodation Assumptions*

The applicant's aspiration to achieve a 30% local workforce is commendable but likely unachievable due to the impact of other, concurrent projects. Existing labour shortages across the region, along with modelling by the University of Technology Sydney's Institute of Sustainable Futures, indicate that achieving local workforce targets would require re-engaging long-term unemployed individuals. This is an ambitious objective and makes a drive-in/drive-out (DIDO) or fly-in/fly-out (FIFO) temporary worker cohort likely.

The applicant has not made provision in their EIS or amended EIS for temporary workers' accommodation. Given the current housing context in Uralla Shire—limited rental availability and escalating prices—the influx of workers into existing housing or visitor accommodation is one of the most corrosive social impacts of Renewable Energy Zone (REZ) projects.

It is strongly suggested that relying on existing housing and accommodation stock should **not** be the outcome of the proposed Workforce Accommodation and Employment Strategy. Uralla is currently undertaking a Local Housing Strategy to respond to rapid changes in housing demand linked to renewable energy projects. As part of this process, we have consulted widely, and we believe that the applicant's assumptions about accommodation availability are not consistent with reports from Tamworth, Armidale, Uralla, and Walcha council officers, real estate agents, or accommodation providers. Nor are the applicant's assumptions consistent with Uralla's experience during the construction phase of ACEN's NES project, which used a similar approach to workforce accommodation. Notably, NES is located less than 25 km from Armidale.

#### *Recommendations for Workforce Accommodation and Employment Strategy*

The Workforce Accommodation and Employment Strategy should:

- Be developed with further input and coordination by affected councils and EnergyCo, as EnergyCo is currently completing region-wide cumulative impact studies for workforce accommodation.
- Address travel time limitations imposed by subcontractors (e.g., 45-minute fatigue catchments), noting that Winterbourne Wind Farm is approximately 70 km from Armidale and 113 km from Tamworth, where most regional accommodation options are located.
- Leverage any opportunity to work with Uralla Shire Council (or others) to establish a temporary worker accommodation camp to alleviate expected pressures.

#### Resource Requirements

In Council's initial submission to the EIS, we highlighted the applicant's failure to adequately address quantities, sources, and transport routes for construction materials, particularly aggregates and water.

#### *Quarried Material*

The addition of a quarry to the project, along with details on groundwater sources, access arrangements, and extraction rates, are welcome amendments to the EIS and largely address concerns about sourcing and haulage of materials.

#### *Water*

The addition of detailed studies on water availability and access is welcome. However, Council would like to flag that water is emerging as a key cumulative impact risk.

Ground and surface water studies and Water Access License market monitoring were conducted over the past three years during an unusually wet period. Accessing water during droughts will be contentious and entail considerable political risk to these projects. What contingency arrangements have been considered for periods of drought? Consideration should be given to the potential haulage impacts during droughts.

#### Transport Routes

The inclusion of a Staces Road–TSR road upgrade to avoid the Oxley Highway and Uralla township is welcome and directly responds to concerns raised in our earlier submission.

Further consideration should be given to oversize/over-mass (OSOM) pullovers along Thunderbolts Way, where the road width is often only 6 m while OSOM vehicles may be up to 5.4 m wide. The condition of road shoulders along Thunderbolts Way may not support passing or pull-over, which poses a safety risk to other road users and likely damage to Council infrastructure. Council would welcome detailed advice on how OSOM movements and vehicle passing would work in practice.

#### Road Impacts

The applicant's intention to conduct pre-and post-construction dilapidation surveys is noted. It is strongly suggested that any issues identified prior to construction be considered for upgrades in advance to mitigate the risk of failure during construction. Damage to local roads is almost certain and will lead to delays and

inconvenience for other road users as Council may need to undertake roadworks during the construction period.

Strategic upgrades to the road network, particularly Thunderbolts Way, should be considered to prevent failure, enhance safety, and mitigate unforeseen costs.

#### Waste Disposal

No further detail has been provided. Uralla's capacity to accept landfill is limited, although there may be opportunities to upgrade our waste facilities to manage cardboard. It is our expectation that Council be consulted in the formulation of a Waste Management Plan.

#### Biodiversity

A major source of community concern with the original Winterbourne proposal was the volume of tree clearing, native grassland disturbance, and habitat fragmentation involved, much of which was in high-quality habitat and involved threatened vegetation communities, thus triggering provisions of the EPBC Act.

The permanent disturbance impacts, particularly clearing of established woodland, appear to have been significantly reduced in the amended project. However, the temporary disturbance footprint has increased by over 500%.

USC seeks guidance from other agencies on the acceptability of these outcomes concerning critically endangered and threatened species, noting that the Amended Biodiversity Assessment Report runs to nearly 1,000 pages of detailed, technical information.

#### Key Biodiversity Questions:

- How will onsite "no go" zones be monitored and enforced?
- Is a 600 m buffer sufficient from the escarpments that define the boundary areas of Oxley Wild Rivers National Park?
- Should the proposed regeneration of 15 ha of critically endangered TEC be undertaken on-site to reduce fragmentation?
- How will the results of monitoring and evaluation of threatened species be made available to Council and the community?

#### Decommissioning Arrangements

It is noted that the amended report specifies that Vestas must continue lease payments to hosts until decommissioning takes place. This is an improvement on the level of detail provided by the original EIS.

USC will continue to lobby the NSW government and the broader renewable energy industry for a bond or other coordinated approach to decommissioning. We do not believe that landowner agreements adequately manage end-of-life risks posed by wind farms.

Yours sincerely,



Toni Averay  
**General Manager**