



## **SUBMISSION – WALCHA COUNCIL**

### **EXHIBITION OF AMENDED STATE SIGNIFICANT DEVELOPMENT APPLICATION**

#### **WINTERBOURNE WIND FARM**

##### **SSD-10471**

Walcha Council (WC) appreciates the opportunity to provide this submission to the New South Wales Department of Planning, Infrastructure and Housing (DPHI) regarding the proposed Winterbourne Wind Farm (the Project). WC understands the Project is located approximately 6.5 kilometres (km) north-east of Walcha, NSW and within the Walcha Council and Uralla Shire Council local government area (LGA).

The Project was classified as state significant infrastructure (SSI-10471) under Part 2.2, clause 2.6 and Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021. An Environmental Impact Statement (EIS) was prepared in October 2022 (ERM 2022), seeking approval for the Project under Part 4 of the Environmental Planning and Assessment Act 1979. Based on the EIS, the Project comprised:

- up to 119 wind turbine generators (WTGs)
- approximately 113 km of internal access tracks (to be constructed) and existing road upgrades
- ancillary infrastructure and works (including switchyards, a power reticulation network, substations, battery energy storage systems, meteorological masts, operational buildings, landscaping, utilities and erosion/sedimentation controls).

WC provided a submission to the EIS on 19 January 2023, requesting further understanding of the social, traffic, water and waste impact assessments undertaken. The Project was subsequently amended (herein referred to as the amended Project) to consider submissions to the EIS and proposed Project design changes, as documented in the Project amendment report (ERM 2024). Amendments included:

- Moving / refining 73 WTG locations.
- The addition of one WTG and removal of two WTGs, amending the total WTGs to 118.
- Project area updates.
- Relocation of selected ancillary infrastructure.
- Inclusion of a quarry within the Project area.
- New transport route to avoid Oxley Highway for inbound Over Size Over Mass (OSOM) vehicles.

WC provides this submission to the amended Project components however, considers the WC submission to the EIS (dated 19 January 2023) to remain withstanding.

## **1. Transport and Roads**

WC acknowledges the minor reduction in the scale of the Project by Winterbourne Wind Pty Ltd (the Applicant) and the incorporation of a quarry (to source raw materials for road construction etc.) is also acknowledged. Assumedly this would have resulted in a decrease of demand on the road network maintained by WC (respective of the original Project) however, the amended Project proposes to utilise Thunderbolts Way and Jameson Street for over size and over mass (OSOM) vehicle movements. As defined in the Roads Act 1993, Thunderbolts Way and Jamieson Street are classified as Regional Roads and Local Roads respectively, and maintenance is the responsibility of WC.

Whilst it is acknowledged that Thunderbolts Way represents the amended access route for all OSOM and most other heavy vehicles, it is requested DPHI considers the importance of Thunderbolts Way to the broader New England region when assessing the impacts of the proposal, noting Thunderbolts Way is the main highway in and out of Walcha.

Thunderbolts Way represents the fastest route for emergency services to Walcha from the nearest main hospital in Armidale, serving hundreds of daily commuters and forms the only point of road access for dozens of major primary producers in the region.

Thunderbolts Way is considered relatively bushfire and flood resistant and often becomes a critical point of access for the Walcha community, in the event that the Oxley Highway is closed. In addition to this, Thunderbolts Way becomes the main alternate route between the New England and Hunter and Sydney regions whenever there is a major accident on the New England Highway.

WC considers it imperative that any use of Thunderbolts Way for the construction of the Project (and any other SSI projects) mitigates impact the to the existing community traffic access. Walcha Council firmly believes the current draft of the Traffic Impact Assessment (ERM 2024) doesn't provide enough detail in this regard.

### **OSOM Traffic Safety**

The application documentation identifies that the proposed route corridor is generally suitable for the OSOM movements proposed. However, the Traffic Impact Assessment provides limited reference to the impacts of these movements on local traffic function and safety.

This is of particular concern because the Thunderbolts Way pavement width from Uralla to Walcha fluctuates between 6m to 9m, contains some twisty areas and is almost completely void of safe pulling over areas for large vehicles. Most of the unsealed shoulder area is grassy topsoil on a steep grade.

Most OSOM vehicles will be between 4.2m and 5.9m wide. This will require on-coming traffic to either in-part or entirely move off the main sealed road. The OSOM load will also need to periodically move off the road to allow traffic behind the convoy to pass. The existing verge

off the sealed formation is entirely unsuitable for any heavy vehicle to come off the main road, especially in wet weather.

It is Council's position that adequate provision for safe vehicle movements including formally constructed passing and roadside layby areas along Thunderbolts Way is a critical requirement prior to construction commencing.

WC requests that DPHI request the Applicant to review and revise the Traffic Impact Assessment with a detailed Road Safety Audit and Traffic Management Plan that at a minimum outlines required passing and pullover locations along with a generic design for a hardstand pullover area as an example of what will be built at each specified location.

### **Long Term Pavement Degradation**

The application documentation doesn't fully address whether the existing road network is sufficient to accommodate the additional demand generated by the proposal.

As the roads authority responsible for Thunderbolts Way and many other local roads to be relied on for the project, concern is raised in relation to the long-term, cumulative impacts on public road infrastructure and ensuring that the repair and maintenance that is required to be undertaken by the Applicant is completed to the satisfaction of WC and the community.

Further consideration must be given in relation to an appropriate standard for Thunderbolts Way to be used in the construction phase of the proposal and how these can be equitably upgraded and maintained without unreasonable financial impacts on the Walcha community. WC acknowledges the requirement for dilapidation reports prior to use of the road network. However, no assessment has been undertaken on Thunderbolts Way to determine if the existing pavement strength and width is up to the task of supporting the anticipated traffic loads to begin with.

There are some areas on Thunderbolts Way where the pavement is narrow and is already in poor or very poor condition. Walcha Council believes that without upgrading these sections of road prior to construction there is a risk of major road failure. Once construction starts on the project it will not be able to afford major delays because of road reconstruction and repairs. Therefore, by not upgrading these sections of road the construction phase of the project poses a major risk to the road which in turn jeopardises its only OSOM route to the project and the safety of the rest of the community who use the road on a daily basis.

Furthermore, the EnergyCo Transmission Line project and other anticipated renewable energy projects are expected to make use of Thunderbolts Way as a key transportation link, especially for OSOM vehicles. These projects may in fact overlap with the Winterbourne Wind project's construction period.

WC is therefore very concerned about the cumulative impacts of many years of heavy use on the route unless major upgrades can be undertaken upfront on sections of the road that can be identified as already being in poor or very poor condition or as simply being unsuitable to support significant numbers of OSOM vehicles.

Therefore, as well as a simple dilapidation report, WC requests that a detailed engineering analysis of Thunderbolts Way will need to take place to assess the existing condition of the road corridor to determine its suitability to service the anticipated construction traffic loads prior to construction taking place.

WC requests that DPHI require the Applicant to revise and update the Traffic Impact Assessment with a detailed engineering analysis of the full length of Thunderbolts Way with a detailed geotechnical report outlining the suitability of the existing pavement to support the anticipated traffic.

WC also requests DPHI require that the Applicant provide an engineering report to nominate upgrade works required to make Thunderbolts Way fit to support the required traffic loads.

If the application is recommended for approval, WC requests consent conditions to require that upgrades on any road must be completed prior to any construction works for the project taking place. All upgrades within the Walcha Council LGA must be approved by Walcha Council as the roads authority.

## **2. Workforce**

The minor reduction of estimated total number of full time equivalent (FTE) jobs during the construction phase is noted. WC remains concerned about the impacts of the influx of workers during the construction phase relating to both traffic movements and accommodation.

As a small rural community, the Walcha Council LGA has limited existing infrastructure for both short- and long-term accommodation and limited capacity to provide additional accommodation without impacting on current social needs. It is expected in the immediate term that the proposal will be heavily reliant on workers commuting from larger regional centres and that the commitment of 1/3 locally based workforce will not be achievable.

It is acknowledged the Applicant has considered the cumulative impacts of other renewable energy projects (such as the proposed Ruby Hills Windfarm and New England Transmission Line) in their evaluation of the social impacts. There is a commitment to providing a Workforce Accommodation Strategy prior to construction commencing.

WC are requesting further detail on the Workforce Accommodation Strategy and are concerned whether it will be an enforceable component of the Project proposal. If the proposal is recommended for approval, Council requests DPHI consider clearer and more specific commitments from the applicant regarding workforce sourcing and accommodation to minimise local impacts.

## **3. Resources**

Council would like to emphasise for DPHI's consideration in the assessment of the proposal the intended access to water resources which are expected to be extensive for this project. The application documentation identifies that the expected primary source of water will be groundwater from below the project site. Further environmental assessment consideration is requested to ensure this resource is sufficient for the project and its extraction will not have negative environmental impacts on the ecology of the area.

#### **4. Proximity to Walcha**

WC acknowledges some reduction in visual impact of wind turbines from the original EIS to the amended Project, however notes that the Project remains within 7kms of the township of Walcha. WC's position is that this distance is still too close and requests that further consideration be given in regards to the Project's proximity to town.

#### **5. Waste and Decommissioning**

WC emphasises points made in its previous submission regarding waste management and disposal. If the proposal is recommended for approval, it is requested that DPHI clearly specify the waste management expectations for the Project to ensure no unreasonable additional burdens or demands are placed on local waste disposal facilities.

Further clarity is requested from the Applicant regarding the decommissioning phase of the project. Council's previous submission requested that waste management be adequately addressed prior to approval and not deferred to a post-consent waste management plan.

Council also emphasises its previous submission points regarding decommissioning and the requirement for a decommissioning bond. If approval is recommended, Council requests DPHI consider the above requirement and apply specific consent conditions on the development to ensure decommission and rehabilitation commitments proposed by and required of the applicant are achieved.

#### **6. Construction Period**

The amended Proposal extends the construction period from 30 months to 52 months. It is requested DPHI adequately assess the potential impacts of this and its cumulative impacts on tourism, local workforce, rental prices (loss of local renters), social services, safety and liveability for Walcha residents.