

Tatsiana Bandaruk
Department of Planning, Housing and Infrastructure
GPO Box 39
Sydney NSW 2001

Dear Ms Bandaruk,

WINTERBOURNE WIND FARM - (SSD-10471)

I refer to your Major Projects portal referral dated 4 October 2024, seeking Tamworth Regional Council's (TRC) advice regarding an amendment application to the State Significant Development application for a new windfarm and ancillary infrastructure to be located in the Walcha and Uralla Shire local government areas (LGA). TRC was not consulted during the initial exhibited EIS and therefore did not provide any comments.

The submitted amendment documentation and supporting reports have been reviewed and the following advice is provided for your consideration:

1. Transport Route

Although the development is not located in the Tamworth LGA, it is unclear why TRC was not included in the original round of notifications as all componentry would need to be transported via the Tamworth LGA. This omission is disappointing and of concern to Council.

TRC was approached by consultants on behalf of the proponents to discuss the passage of OSOM components, and in particular the turbine blades, through the Tamworth LGA. The discussion was centred around the use of Goonoo Goonoo Road, Scott Road, Murray Street and Armidale Road. This route was utilised in the past for OSOM movements for wind farms constructed near Inverell. In those cases, the maximum blade size was 65m. In this case, Vestas propose to use 79m blades. Documentation was presented to TRC demonstrating the impact of the longer blades, and nominating specific swept path impacts and management strategies.

The information now before TRC for consideration includes this earlier option, together with two new options that avoid the Tamworth CBD, being:

- Option 2: Whitehouse Lane, Marsden Park Road, OBriens Lane and Nundle Road; and
- Option 3: Whitehouse Lane, Marsden Park Road, OBriens Lane, Back Kootingal Road, Denman Avenue and Dorothy Avenue.

The icubed assessment appears to nominate Option 2 as the preferred option for OSOM movements, however the ERM Amendment Report is less committal – keeping all three options open for consideration, and incorrectly referencing the preferred route as Option 3 (in the ERM Amendment Report at the bottom of page 58 and the Response to EIS agency advice at Appendix D Table 32 – bottom of page 93). This uncertainty is of significant concern to TRC. Council is strongly of the opinion that the OSOM route should be definitively resolved prior to the issue of any consent. This comment is consistent with concerns raised by TfNSW in its agency advice with particular focus on the classified road network. The same sentiment applies to Tamworth Council's local road network.

Looking in detail at what Council understands to be the proponent's preferred option – namely Whitehouse Lane, Marsden Park Road, OBriens Lane and Nundle Road – the option relies on *reversing* manoeuvres on critical sections of the State and local road networks. In the first instance, trucks and dollies transporting turbine blades will be required to stop on the *wrong* side of the New England Highway to the immediate north of Whitehouse Lane, *reverse* into Spains Lane, and then proceed in forward motion into Whitehouse Lane. In the second instance, trucks and dollies transporting turbine blades will be required to proceed across the Nundle Road roundabout at Back Kootingal Road, *reverse* onto the Nundle Road verge, manoeuvre forward into the eastern leg of Nundle Road, *reverse* for some considerable distance along the western leg of Nundle Road towards New England Highway (including crossing the Cockburn River bridge in *reverse* motion), and *reverse* into Armidale Road before proceeding up the New England Highway in forward gear.

These proposed movements are ridiculous and are certainly not acceptable to TRC. Further, the impact of these movements is exacerbated in the case of the Nundle Road portion, by the closure of the associated portions of roadway for a considerable amount of time, therefore significantly affecting traffic flow.

Enabling these movements at the nominated intersections will involve unnecessary vegetation clearing, service relocation and temporary pavement construction that will not achieve what should be the construction of a robust, permanent transportation solution for the movement of OSOM componentry as currently being investigated by EnergyCo. Similarly, the Vestas proposal for negotiating the Whitehouse Lane / Marsden Park Road intersection – while not involving reversing manoeuvres – still involves unnecessary clearing and pavement construction on a sub-optimal alignment.

The philosophy that is consistently being espoused during plenary meetings with EnergyCo, TfNSW and your department when discussing this issue is “*do it once – do it right*”. Issuing a consent that facilitates the transportation options described above is surely driving the opposite outcome and should not be supported.

Generators not associated with the New England Renewable Energy Zone have been designated as “early movers”. These “early mover” projects need to move forward with their logistics – but do not have powers of acquisition enjoyed by EnergyCo (via TfNSW) in terms of establishing optimal OSOM bypass routes. It is acknowledged that these projects should be provided with a degree of certainty so that they can move forward with financing and detailed planning. However, that is not an acceptable reason to permit

a significant rollout of sub-optimal transportation solutions that will in all likelihood be made redundant when EnergyCo finalises its own more robust solutions.

For this reason, Council considers that the only appropriate way forward is that your Department ensure that any consent for the Winterbourne project either be withheld, or alternatively documented to include a deferred commencement condition regarding the establishment of a comprehensive and robust OSOM solution for the southern bypass of the Tamworth city centre.

2. Vegetation removal

As mentioned above, the proposed haulage routes will require the removal of vegetation, which has not been clearly identified or included in the amended Biodiversity Development Assessment Report prepared by ERM. It is noted that some of the vegetation is located on privately owned land. In this respect, further assessment including details of vegetation species, and potential biodiversity impacts are required.

3. Cumulative impacts

- *Traffic*

Cumulative traffic impacts from the proposed haulage routes on potential periods of construction overlapping with other renewable energy projects has been identified as a significant risk, where several projects are anticipated to utilise the same transport routes from the Port of Newcastle. The cumulative impacts of traffic congestion, road closures and disruptions to local Tamworth LGA residents, particularly during OSOM movements for Winterbourne, and other renewable energy projects may occur at unacceptable levels, and will require further specific assessment and recommendations. There is considerable disparity in the way these matters are assessed across different projects and consulting teams. It would seem logical that a combined effort be coordinated, perhaps under the stewardship of EnergyCo.

- *Local job network/employment*

Cumulative impacts on the local job network from potential periods of construction overlaps with other renewable energy projects within a 92km radius of the project site were acknowledged, some of which is located within the Tamworth LGA. While construction related jobs are often flagged as important considerations, there are also ongoing jobs required for operational work such as auditing, project management, electrical work, etc. Council's expectation is that there will be more attention given to this, including creating more opportunities for traineeship/apprenticeships for Renewable Energy Zone (REZ) related skills.

- *Worker accommodation/worker influx*

The amended Social Impact Statement prepared by ERM has identified that in addition to Winterbourne Wind Farm, there are several other renewable energy projects anticipated to locate staff in Armidale, Uralla and Tamworth LGAs. The Workforce Accommodation Strategy should therefore be developed in tandem with the Procurement Strategy, with additional timeframes taken into consideration for the training of REZ related jobs to ensure that maximum staff are sourced locally to alleviate

additional demand for non-local worker influx for accommodation within the Tamworth LGA. There is an opportunity to consider short term accommodation options to satisfy the needs of temporary workers during the construction phase of the project; with a future vision of ongoing long term accommodation options which will benefit the Tamworth Region. However, Tamworth LGA is currently experiencing worker shortages in all areas, particularly skilled workers, local tradespersons and labourers; and the aims of the Procurement Strategy to prioritise local employment may lead to further worker shortages in the region and ultimately impact on housing construction and completion rates. This in turn may exacerbate the issue of available housing stock which will be under further pressure with the increased demand from the REZ projects, including Winterbourne Wind Farm. Therefore, further consideration and assessment of the cumulative impacts on accommodation demand on the local rental market within Tamworth LGA which is currently undersupplied should also be undertaken when preparing the Workforce Accommodation Strategy. Overall, a balanced approach in consideration of these cumulative impacts on worker accommodation and worker influx is pivotal.

- *Tourism*

The impacts on Tamworth's tourist economy which is based around events, could be catastrophic if the accommodation strategy does not properly consider the number and range of events held in the Tamworth Region per year and when they occur (generally almost every weekend). Should some events be impacted by the lack of accommodation options as a result of the REZ projects "booking out" available accommodation it may be difficult for any such events to recover. It is vital that all REZ projects, including the Winterbourne Wind Farm, strongly consider the timing of tourism events and other renewable projects when preparing construction timeframes to ensure these impacts are minimised. www.destinationtamworth.com.au has a regularly updated calendar that will assist, however consultation with Council's Coordinator Visitor Economy is strongly recommended.

If you have any enquires regarding this matter, please contact Council's Development Division on the number below.

Yours faithfully



Gina Vereker
Director, Liveable Communities

Contact: Cynthia Lambert (02) 6767 5507 or Email: c.lambert@tamworth.nsw.gov.au

26 November 2024