



SSD-41743746

27 March 2026

NSW Department of Planning, Housing and Infrastructure

RE: Murrumbidgee Council Submission – Yanco Delta Wind Farm - Worker accommodation facility and infrastructure changes (SSD-41743746-Mod-2)

Murrumbidgee Council (Council) wishes to submit the following comments and proposed conditions of consent in relation to the Yanco Delta Wind Farm Modification application for *Worker accommodation facility and infrastructure changes* (SSD-41743746-Mod-2) within the Murrumbidgee Council area.

1. Traffic and Transport

Murrumbidgee Council (MC) is the local roads authority under the provisions of the NSW Roads Act 1933 for all or parts of the following roads proposed to be used by the construction and operation of the Yanco Delta Wind Farm;

Showground Road, Wilson Road, Moonbria Road, McLennons Bore Road, Mabins Well Road, Cadell Road, Jerrys Lane and Liddles Lane.

As the local roads authority, MC is committed to ensuring that these roads and lanes, as well as associated bridges, culverts and crossings on them, are constructed and maintained commensurate with the number and types of vehicles using these roads.

Real life experience gained during the construction of the Dinawan Sub Station and the Project Energy Connect transmission line within the MC area, has proven that the default condition of consent applied by NSW Planning that requires a pre and post dilapidation road report, is an abject failure and does not in any way maintain either the safety or sustainability of a Council road. Furthermore, the constant surveillance required to ensure that developers repair and maintain local roads, damaged through either traffic volumes or their use during and after rain events, very quickly becomes a resource and financial burden that cannot be sustained, despite subsequent funding from Energy Co.



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As a result of this experience, MC resolved that never again would it permit its local roads to be destroyed by any developer and that the safety and level of service of our local roads, expected by our community, will be protected and maintained at all times. As such in accordance with s.98 of the Roads Act, Council will direct any person to alter any work they propose to undertake on a public road to a standard specified by Council.

To ensure that our local roads are kept to a standard applicable to increased usage resulting from new developments MC adopted the Murrumbidgee Council Development Roads Upgrades & Maintenance Policy which;

establishes minimum road construction standards, including bridges, culverts and drainage, for developments that result in an increase in either vehicle movements and/or non-typical vehicle types that are considered by Council to be above the capacity of the road proposed to be used by the development.

MC has over the past several months met with representatives of Origin Energy (OE) to discuss the use of the above roads, advising OE that all of the roads, lanes and bridges have been constructed and maintained by Council for past decades at a level of service that meets the needs of the communities in this area, that is adequate with very low daily traffic volumes, and that their proposed exponential increase in passenger vehicles and heavy trucks as well as over size over mass vehicles, will very quickly destroy the local roads to the point of becoming unusable.

OE were also fully advised that it is the expectation of MC that they will need to fund any required upgrades, either fully in the case of Jerrys and Liddles Lanes, Showground Road, Moonbria Road and Wilson Road or partly in the case of McLennons Bore Road, Mabins Well Road and Cadell Road, where road upgrade costs will be shared by other renewable energy developments.

It is therefore extremely disappointing and concerning that despite all previous meetings between MC and OE, the Revised Yanco Delta Wind Farm Modification 2 Traffic and Transport Impact Assessment from Aurecon 2025, summarises the local road network by dismissing the issues raised by MC by claiming that;

- *peak construction indicates the overall network will continue to operate satisfactorily under increased traffic volumes, including an average of 206 two-way construction heavy vehicles trips daily during the construction period. This satisfactory performance can be attributed to the existing and projected surrounding road network, which demonstrates sufficient excess capacity*
- *detailed pre-construction dilapidation surveys will ensure the existing road conditions (prior to project construction commencement) are documented, enabling appropriate maintenance and mitigation measures to be undertaken if necessary.*
- *no significant road safety issues are anticipated directly related to the Project's construction and operation*
- *local roads have a capacity of 1,000 pcu/h for each direction of travel has been conservatively assumed for unsealed local roads in the study area, including Liddles Lane and Jerrys Lane.*



In the opinion of MC other issues and failures of the assessment report includes;

- The traffic impact assessment has assumed a road capacity of 1,000 (table 4.2) for McLennons Bore Road, Cadell Road, Fernbank Road, Wilson Road, Liddles Lane and Jerrys Lane, in order to determine the volume to capacity ratio and hence the expected level of service (LOS).
These roads are constructed and maintained by MC to a standard of between 10 to 20 vehicles per day and are classified under Austroads Standards of U5 to U4. When used to calculate the volume to capacity the expected LOS will reduce from level A to C at which speed and usability will also reduce on the local roads based on current average traffic volumes.
- The assessment report identifies that impacts are expected *on the unsealed roads used to access construction compounds and access points, primarily due to the volume of proposed construction vehicle traffic, particularly the high volume of OSOM vehicle movements.*

To address these impacts the assessment report relies upon *condition assessments of the proposed local access roads, including dilapidation surveys prior to construction would be required to be carried out on all local roads within the project boundary to record the existing road condition in consultation with the relevant road authorities. Routine inspections and maintenance would need to be completed along all nominated routes to ensure that construction routes and access tracks to construction compounds are maintained to a safe standard during construction, in consultation with the relevant road authority.*

As previously advised this approach failed to maintain safe trafficable local roads during the construction of the PEC transmission line and the Dinawan Substation and will not be again agreed to by MC.

The assessment report has therefore completely dismissed the past discussions between MC and OE at which Council's road upgrade policy has been discussed and justified by MC.

- The assessment report fails to address the use of the existing bridge over the Yanco Creek and associated culverts on Wilson Road. The southern area of the development will consist of 33 towers, creating approximately 462 OSOM vehicle movements over this bridge which could have individual weights of up to 324 tonne (transformer).

This bridge is not mentioned in section 5.2.9.4. nor section 9.2 or table 9.2 of the assessment report.

Council has had an independent condition and capacity assessment which has rated this bridge as having a maximum load limit of 10 tonnes.

- The assessment report fails to address the use of existing bridges on the Kidman Way following the likely change in the OSOM route from the Adelaide Port to the site.



Coleambally Irrigation have advised MC that they are responsible for a bridge on the Kidman Way and that this bridge will not cope with the expected weight of these OSOM loads and the statement in section 5.5.11.5 that *structures on State highways are not a concern as they are designed to support heavy vehicle loads. OSOM vehicle exceeding the 184.5 tonne NHVR rating and will require permits for weight and likely bridge load assessments* is incorrect.

This bridge is not mentioned in Section 5.2.9.4 of the assessment report nor in Appendix D – Bridges and culverts along Port of Adelaide OSOM route.

- The majority of the local roads proposed to be utilised during the construction and operation of the Yanco Delta are travelling stock routes that service both travelling stock reserves as well as day to day farming operations involving moving stock across or along the road that are undertaken by adjacent farm businesses.

Section 4.10.2 whilst identifying travelling stock reserves and routes, does not describe how the safe movement of stock on these roads will be maintained by transport, by both workers and delivery drivers.

Stock on travelling stock routes have right of way and other road users must not interfere and move off to allow stock to pass.

In conclusion, Murrumbidgee Council believes that the statements, data and approach of the Revised Yanco Delta Wind Farm Modification 2 Traffic and Transport Impact Assessment from Aurecon makes it extremely difficult for MC to be convinced that this road assessment report is focused on ensuring that the impact of either the construction or operation of the Yanco Delta Wind Farm has prioritised the impacts that it has on local roads and the community of Murrumbidgee Council.

This conviction of MC can only be reinforced by the final statement of the report that *it is considered that the traffic and transport impacts associated with the construction and operation of the Project (as modified) would be generally low and the road network would operate close to existing conditions. Any minor impacts are manageable through the upgrade of access points, consideration of permit application for OSOM, implementation of a fatigue management plans and vehicle movement plans for haulage routes, and a road pre-condition survey and pavement asset maintenance plan to manage the impacts associated with pavement quality along the haulage routes*, especially when past experience, common sense and local knowledge all indicate that adherence to this report will result in the complete destruction of Council's local roads to the real detriment to the safety and usability of these roads by our community as well as the developer.

It is therefore recommended that the following Conditions of Consent be included in the modification consent;

- 1. That the Developer must develop a Traffic Management Plan in consultation with Murrumbidgee Council, Edward River Council and Energy Co that includes road and bridge upgrade works on all local roads to be used by the developer which will result in the Developer upgrading**



these roads and bridges to a standard commensurate to the increased traffic volumes and loads resulting from the development in accordance with Austroad Standards and the Murrumbidgee Council Development Roads Upgrades & Maintenance Policy.

2. That if Yanco Delta wish to pursue crossings that may exceed the Coleambally Irrigation T44 bridge's current rating, CICL requires that appropriate mitigation measures be identified, assessed, and implemented at the proponent's cost.

This would include, but not be limited to:

- a) Provision of detailed vehicle configurations, axle loads, frequencies, and timing of
- b) proposed movements
- c) Independent structural assessment and certification by a suitably qualified engineer
- d) acceptable to CICL
- e) Identification and implementation of any strengthening, protection, monitoring, or
- f) traffic control measures required to manage risk
- g) Formal approval from CICL prior to any such movements occurring

Until these matters are satisfactorily addressed and written approval is issued, use of the bridge for loads exceeding T44 is not authorised and must not proceed.

2. Voluntary Planning Agreement

The Yanco Delta Wind Farm – Modification 2 Engagement Outcomes Report mentions in section 2.2.1 Community Engagement, that Origin Energy have voluntarily agreed to contribute \$31 million to be shared equally between Murrumbidgee Council and Edward River Council under the 2024 Department of Planning, Housing and Infrastructure Benefit Sharing Guidelines.

It is therefore recommended that the following Condition of Consent be included in the modification consent;

Prior to commencing construction, the Applicant must enter into a Voluntary Planning Agreement (VPA) with Murrumbidgee Council and Edward River Council for the payment of a developer contribution of \$31 million over the life of the development to be shared equally between Murrumbidgee Council and Edward River Council in accordance with Division 7.1 of Part 7 of the EP&A Act and the Department of Planning, Housing and Infrastructure Benefit Sharing Guidelines 2024.



3. Accommodation and Employment Strategy

The proposed modifications to the original development include the construction and use of an onsite temporary accommodation camp on Moonbria Road that will house up to 895 workers during peak construction.

Council could not locate within the documents submitted in support of this modification any plans or details of this accommodation camp.

It is therefore recommended that the following Condition of Consent be included in the modification consent;

That the Developer must consult with Murrumbidgee Council with the development of any Accommodation Camp Management Plan.

Murrumbidgee Council understands that Yanco Delta Wind Farm are proposing under their Access Right Holders initiative to enter into an education partnership with Charles Sturt University.

Murrumbidgee Council has long advocated for educational programs to be focused on traineeships or cadetships that will promote the sustainability of Councils within the REZ, by training local school leavers into professional fields such as planners, engineers or accountants. This would involve the payment of wages and course fees by renewable energy developers for students who would be employed and working for a Council in the REZ area.

It is therefore recommended that the following Condition of Consent be included in the modification consent;

That the Developer to consult with Murrumbidgee Council concerning the proposed education partnership with Charles Sturt University to explore the development of a trainee program for professional Council staff.

4. Changes to external transmission line

The modification also includes the establishment of a new route for a 330kV or 500kV transmission line connecting the development to the Dinawan Substation.

The proposed route of the transmission line is within the road reserves of McLennons Bore and Cadell Roads.

As the local road authority for these roads Council is opposed to this route and sought the assistance of Energy Co to negotiate with Origin and Spark Renewables to use adjoining cleared private land for this transmission line.

The owners of this land have agreed to this proposal, however both have agreements in place with Spark Renewables who has refused permission under these agreements.

Despite Energy Co assuring Council that they have the authority to change the route from the road reserve to the adjoining private land, they were not able to do so.



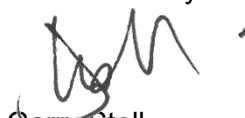
Council remains opposed to the construction of this private infrastructure on public land and remains concerned with the location of the towers on Cadell Road.

It is therefore recommended that the following Condition of Consent be included in the modification consent;

That the final designs for the installation of the Yanco Delta Wind Farm transmission line be submitted to Council for approval as part of the Traffic Management Plan and that in particular the final designs within the Cadell Road reserve include, both guard rails and road widening.

Please do not hesitate to contact the undersigned if you require any further information.

Yours faithfully



Garry Stoll

Director Planning & Infrastructure

