

Office of the General Manager

LP | LAN900118

13 December 2023

Natasha Homsey
Energy Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Natasha,

SUBJECT: BURRENDONG WIND FARM (SSD-8950984) - OBJECTION TO APPLICATION

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to comment on the Environmental Impact Statement for Burrendong Wind Farm (SSD-8950984), Council have reviewed the documents and wishes to lodge an **objection** to the application.

REASON FOR THE OBJECTION

Council objects to the project, as the provided documentation is significantly lacking detail and at times inaccurate. Furthermore, it fails to consider the cumulative impact of surrounding renewable energy projects in the region.

In summary, the EIS report provides very little detail and is not much more than a scoping document. There are too many unknowns about this project to make an informed decision about the impacts of this project on the community and Council assets. To highlight:

1. there is no set Port to Site transport route for transport of materials,
2. there is no agreed accommodation solution for 250+ workers (375 in peak), which then has knock-on effects of unknown movements of light vehicle transport of workers to site and;
3. the report frequently notes that the final project is subject to change, including final layout, location of specific areas to the site (such as concrete batching and rock crusher) and location of components.

Whilst the proponent states it has purposely left many aspects open for flexibility, there is too many unknowns with potential negative outcomes and therefore consent should not be provided.

Further key issues identified by Council of great concern include:

- The limited transport report only considers traffic generated by this project. A requirement of the SEARs is to consider cumulative traffic generated by this project and other nearby energy projects.

- The provided EIS has identified sources of infrastructure in the region that simply do not exist. Gulgong and Rylstone are said to have hospitals, these are not hospitals, they are Multi-Purpose Services (MPS). Rylstone is said to have a supermarket, it has a small convenience grocer (combined Foodworks and Liquor).
- A VPA has not been agreed upon with Council. The EIS notes a proposed \$3000/WTG. This is not something that Mid-Western Regional Council has agreed to. In the minimum, Council proposes \$1050 per MW generated per the current Draft Large-Scale Solar Guidelines.

FURTHER INFORMATION:

Council requests the following information is provided prior to the consent of the proposed development;

Workforce & Accommodation

The EIS notes there will be an estimated 375 workers during the peak construction period, which is expected to run for a period of approximately 18-24 months. The EIS has proposed that most accommodation options in the Study Area are located at Mudgee (35-minute drive), reflecting the town's role as a regional service centre. A more limited provision of visitor accommodation is in the smaller towns of Gulgong (45-minute drive), Wellington (85-minute drive) and Rylstone (70-minute drive).

Council strongly objects to this aspect of the project, as there is currently a severe shortage of appropriate accommodation in the region for residents and tourism, made worse by the competing demands placed on accommodation availability by State Significant Developments (SSD) and other major project construction workforces for developments.

The EIS notes in 6.14.1.6. Township Services Capacity - On average, around 75 workers would require accommodation per month across the 24-month construction phase, with this figure increasing to approximately 130 persons at peak construction. Council believes this number will be much higher due to the low unemployment rate in the region. What the proponent also fails to address is that there are a significant number of other major projects within and surrounding the Mid-Western Region looking to construct at the same or similar time. Most projects are estimating 90% non-local workforce and Council even questions if this will be available given the significant volume of projects in the region at the same time.

This shortage/competition will be particularly evident during the construction phase, which coincides with the peak construction periods of several other SSD projects in the region that are either approved or in the assessment/consultation phase. More projects are planned every day to meet the objectives of the Renewable Energy Zone, including:

Approved and/or Proposed SSDs in the Mid-Western Region LGA

EnergyCo Transmission Line

Stubbo Solar

Narragamba Solar

Birriwa Solar

Beryl Solar

Mayfair Solar

Mavis Solar

Tallawang Solar

Barneys Reef Wind

Burrendong Wind

Piambong Wind
Orana Wind
Bellambi Heights Battery
Beryl Bess
Bowden's Silver Mine
Moolarben Coal Mine
Ulan Coal Mine
Wollar Solar
Within 40 minutes
Valley of the Winds
Liverpool Range Wind
Spicers Creek Wind
Cobbora Solar
Dapper Solar
Sandy Creek Solar
Merriwa Solar
Goulburn River Solar
Yarrabin Phoenix Pumped Hydro Project
Dunedoo Solar
Ungula Wind

Council requests the mentioned construction Workforce Housing and Accommodation Strategy be provided to Council prior to consent of the proposed development so a proper assessment can be made. This should include the capacity to host up to 100% of workforce requirements. There are many issues raised in the EIS, where the mitigating measure is the development of this strategy. This strategy is critical to the project and needs to be completed and approved by Council prior to consent.

Council advises the Workforce Housing and Accommodation plan should consider that Council does not support the use of existing tourist and visitor accommodation for any construction workforce. Rooms available in the EIS is overstated and Council request the Proponent consider the status and timing of all other state-significant developments within and close to the Mid-Western Region to minimise any adverse cumulative impacts.

The EIS notes 25% of the workforce will be local, however Council advises due to the low unemployment rate of 1.7% (June 2023) in the Mid-Western Region and Mudgee being the closest centre.

Due to a serious shortage of GPs in the Mid-Western Region, with a current GP to patient ration of 1:1168 (Nov 2023). Council strongly recommends including an onsite medical center and a 24-hour nurse practitioner who can prescribe medications. Council also recommends the implementation of telehealth services for workers and residents to access healthcare providers and GPs remotely.

Council requests the mentioned Workforce Management Strategy/Plan for review and approval prior to consent.

Biodiversity

Council is satisfied with the BDAR (Biodiversity Development Assessment Report) completed by ELA for Burrendong Wind Farm. It is noted that WTG's will be constructed to have the least impact to remnant woodland. Although the exact impact of bird and bat strike once WTGs are operational cannot be quantified, Council notes that a bird and bat risk assessment has been conducted and a management plan will be developed to mitigate bird and bat collisions.

Council requests the Proponent to provide further details on how they plan to mitigate the likely high impact to Wedge Tail Eagle and White Striped Freetail Bat and moderate impact to Nankeen Kestrel, Superb Parrot, White Throated Needletail and Grey Headed Flying Fox.

Council also requests to view the BBAMP once completed and ecological reports detailing numbers and species of birds and bats impacted by operational turbines.

Water

The EIS identifies water sources to be the Macquarie and Cudgegong Rivers, Burrendong Dam, Farm dams and local water providers. The fixed water requirements for the Project are quoted as;

- 972.5 ML/- estimated to be required for the earthworks (956 ML), the WTG footings (10.5 ML) and transmission line footings (6 ML), and
- In excess of 1000ML required for dust suppression, the amount of which varies based on the length of road being actively used and the climate at the time.

This is a total of 1972.5ML of raw water requirements for construction, however this may be longer if road/routes are amended.

The EIS notes in Section 6.12.1.2, page 393 - Water Providers are intended on being sourced however have not been determined at this stage of the development process.

The EIS notes in Section 6.12.2.1, page 399 the Proponent references 140-160ML of water for foundation and road construction – this appears to be inconsistent with figures derived in section 3.3.4.2 of the EIS and also Appendix 'Q'.

The EIS also notes in Section 7.1.10, page 483 - Waste Management and Resources' that construction water will be required and that the source of this resource is a commercial procurement decision which will occur post-development consent through licensed sources.

The EIS fails to identify the need for potable water to be provided for a construction workforce. This needs to be addressed in a further report, to understand requirements of additional water requirements for such workers. For example - Other SSD project workforce accommodation camps have highlighted potable water requirements of approximately 250l/person/day. On the basis that at peak there will be 375 workers, this would mean 93,750L of potable water will be required per day. This is more than 6 trucks per day for supply. This water source needs to be identified and truck movements further considered in traffic studies.

For consideration in the development of water sources:

Potable Water - Council advises it does not currently have the capacity to support a potable water requirement. Potable water will be required to be sourced from alternate sources and cannot be sourced from local water carters accessing Council's licenced potable supply. The Proponent may require purchasing a water license to access additional water for this project.

Construction Water - At this point in time, the Proponent should not depend on Mid-Western Regional Council water sources (directly or through third parties) for construction activities, as the capacity to supply this does not exist. Council is willing to discuss this further with the Proponent to investigate alternative opportunities for construction water sources.

Council requests accurate water usage projections and confirmation on where water will be sourced, prior to consent for all aspects of the project including meeting workforce consumption needs.

Sewage

The EIS notes on Table 6-106, page 405 – nominate Mid-Western Regional Council's Sewage Treatment Plant (STP) as potentially receiving waste that is generated by staff amenities, from licensed contractors.

Council advice is that Gulgong, Rylstone, or Kandos Sewage Treatment Plant's (STP) do not have any facilities to receive septage or sewage collected/tankered from sites not serviced by the town sewage collection system. In the Mid-Western Region, Mudgee STP is the only site that can receive such tankered waste.

Mudgee STP has an existing septage disposal facility designed to receive up to 20KL/day of tankered sewage/septage. This facility has been designed to receive septage from Council's rural domestic customers. Mudgee STP has no capacity to accommodate additional loading of sewage at this point in time.

As such any capacity made available to this commercial project will need to be via consideration of STP upgrades. Council is willing to discuss this further with the Proponent to investigate opportunities for sewage disposal. If STP upgrades are not carried out, Council requires the Proponent to have suitable sewage treatment and treated effluent application facilities onsite without the need for sewage transfer to Council facilities.

Council requested accurate projections and confirmation on where sewage will be disposed, prior to consent.

Waste

The EIS notes in Section 6.12.2 the Mudgee Waste Facility was identified as the most appropriate facility to use for waste disposal associated with the Project.

Council requests the Proponent provide specific details regarding the expected waste to be generated during each phase of the project, including construction, operation, and workforce waste, as well as how it will be managed. A Waste Management plan should be developed and approved by Council prior to consent.

In this regard, Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudgee Waste Facility has limited capacity to accommodate enormous quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. All of Councils other waste facilities are waste transfer stations (including Kandos) accepting residential waste only, which is then transported to Mudgee waste facility. They will not be suitable for waste from this project.

Any other materials requiring recycling should be discussed with Council regarding their ability to accept.

Please note any contract with a third party such as JR Richards does not mean that materials collected can automatically be taken to a Mid-Western Regional facility.

Transport

Council requires the Applicant to:

- a) revise and resubmit Appendix I – Traffic and Transport Assessment
- b) revise and resubmit all other sections of the EIS report and attachments where it refers to the outputs of the Appendix I Traffic and Transport Assessment.

The reasoning for this is as follows:

1. The report only considers traffic generated by this project. A requirement of the SEARS was to consider cumulative traffic generated by this project and other nearby energy projects. Known nearby energy projects are Piambong Wind farm, Burrendong Hydroelectric, Ungula Wind Farm and Maryvale Solar Farm. Traffic generated by these projects and any other known projects in the area, together with existing traffic counts, will impact the extent of upgrades required for all access roads and intersections.
2. Appendix I Traffic & transport Assessment states that during peak periods you can expect 375 employees. Assuming the 2 employees per light vehicle this would give Average Daily Traffic (ADT) of light vehicles being 375. If light vehicles make up 81-83% of traffic generated, then it follows that ADT for this project alone is 452 vehicle trips per day (two way). Notwithstanding ADT being underestimated throughout the report cumulative traffic impacts have not been considered in the critical calculations for pavement upgrades and intersection performance. As such the EIS underestimates vehicle trips generated by the project. The implications of this are that the proposed pavement width and intersection upgrades may likely be insufficient to support safe operation of the access roads and intersections during construction phase of the renewable energy projects.
3. Appendix I – Traffic & Transport Assessment table 4.3 provides for road pavement upgrades to Twelve Mile Rd and Yarrabin Rd to 5.5m and Burrendong Dam Rd to 5.5m – 6.5m. The Applicant has previously been advised during consultation that Council requires the traffic impact assessment must be done in accordance with Austroads guide to road design. Council will not accept the alternative methods to calculate road capacity considered in the Traffic Impact Assessment. Council's position is that the proponent must upgrade road pavement formation width and seal Yarrabin Rd, Twelve Mile Rd and Burrendong Dam Rd prior to commencement of the project. This work must be done by Council, at the cost of the applicant, and not be done by other contractors. Austroads guide to road design part 3 Table 4.5 suggest that a minimum 7.0m seal is required where ADT accounts for more than 15% heavy vehicles (this report states 17-19%) and a total formation 9.2m with 7.2m wide seal (6.2m carriageway + 0.5m shoulder seals) is warranted for the traffic ADT 150-500 vehicles per day to be accommodated during construction and decommissioning. Pending proper assessment of cumulative ADT wider pavements may be warranted. Roadside drainage and other road associated infrastructure will also be required to be upgraded outside of the road pavement formation.
4. Appendix I – Traffic & Transport Assessment table 4.3 provides for intersection upgrades to Goolma Rd/Twelve Mile Rd only. Council requires the applicant to consider cumulative peak traffic volumes through intersections, that is it must include for traffic volumes generated from existing local traffic, other nearby renewable energy projects during working hours and to/from workers camps out of work hours as well as consider the swept path for the largest OSOM (Over Size Over Mass) vehicle to access the roads. To that end

the intersections of Goolma Rd/Twelve Mile Rd, Castlereagh Hwy / Hill End Rd, and Hill End Rd/Yarrabin Rd are to be reassessed.

5. Council requires the applicant to perform, at the sole cost of the applicant, the process to legalise the physical road for ALL locations where existing encroachments exist, as well as where ALL proposed widening or relocation of road is required.
6. As workforce accommodation details remain undecided, the current traffic plans lack sufficient information to fully assess for the impact of the accommodation workforce traffic.
7. The absence of a port to site transport plan creates a significant gap and prevents a comprehensive assessment of the cumulative traffic impact.
8. Traffic noise plans need to be updated to reflect actual transport routes.

Council requests updated traffic modelling be conducted after incorporating port to site and workforce traffic data.

Council advice is it does not support "park and ride" type purposes on public land due to insufficient public car parking available in the region, and no public car parks or public road infrastructure are to be used for park and ride.

Visual amenity and other cumulative impacts

Council would like to highlight the Piambong Wind Farm has been largely left out of this EIS report however is geographically close to the project. Whilst layout of Piambong WTGs may not have been known in preparation of this EIS, the Piambong Wind Farm should have been discussed and considered including in Table 6-123. As Paimbong Wind Farm is acknowledged on page 450 of the EIS, the proponent is aware of this project.

This project is missing from Table 2.1 and importantly missing from the Visual Amenity Assessment. Per Piambong Scoping Report (see page 93 Figure 6-12) the Piambong wind farm is within site distance from this project. It is highlights that some residents will be impacted by 3 wind farms in close proximity – Ungula, Burrendong & Piambong. This has been ignored in this EIS. Council request the Visual amenity is re-done to include this project.

Loss of agricultural land

Council would like to highlight the loss of high capability (LSC Class 3) and BSAL of 20.8 hectares is significant in a region of no class 1 land and limited Class 2 land. The disruption of up to 3,050.08 hectares of agricultural land, along with cumulative losses from other renewable projects will lead to reduced food production in NSW.

Impacts on dark sky

The EIS notes lighting will potentially impact dark sky viewing. Council would like the proponent to understand if this will impact local tourism businesses that trade on night sky attraction for visitors to the region.

Mid-Western Regional Development Control Plan (DCP) 2013

Council would like to inform the Proponent to consider the contents of the Mid-Western Regional Development Control Plan 2013, in particular section 6.3 on Wind Farms. Council would like to

highlight the clauses relating to the decommissioning and remediation of land following the cessation of the development, to ensure the preservation of the agricultural potential of the land.

Whilst all DCP 6.3 controls should be considered, special attention could be directed to the following controls:

Turbines shall not be located within 5.0 kilometers of any dwelling not associated with the development or from any lot upon which a dwelling may be constructed. The 5.0-kilometer setback proposes utilising a precautionary principle in addressing perceived visual, noise and health concerns

Turbines shall not be located within a distance two times the height of the turbine (including the tip of the blade) from a formed public road. A greater distance may be required by the road authority;

Turbines shall not be located within a distance 2.0km from a non-related property boundary;

Council acknowledges that local controls – such as Development Control Plans are not a technical matter for consideration in the determination of State Significant Development. Nevertheless, Council requests consideration be given to Section 4.6 of the DCP, as the standards adopted represent the Council and communities' expectations for such development and were the outcome of extensive community and stakeholder engagement. Consideration and compliance with Council's local controls is of great importance to Council, particularly given that wind farms are being imposed upon Council through State legislation, where they would be otherwise prohibited in the C3 (Environmental Management), and where such developments do not comply with any of the zone objectives for the RU1 Primary Production Zone.

Should you have any further enquiries about this matter, please contact Council on (02) 6378 2850.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a stylized flourish extending to the right.

BRAD CAM
GENERAL MANAGER