

31 October 2025

Nicole Brewer
Director, Energy Assessments
NSW Department of Planning, Housing and Infrastructure

Re: White Rock Wind Farm - Modification to MP10_0160

Dear Nicole,

1 Introduction

White Rock Wind Farm Pty Ltd (WRWFPL) has approval to construct and operate the White Rock Wind Farm (the project) approximately 20 kilometres (km) west of Glen Innes within the Glen Innes Severn and Inverell local government areas (LGAs) of New South Wales (NSW). The project is accessible from Gwydir Highway, Ilparran Road, Kelleys Road and Maybole Road and is within the New England Renewable Energy Zone (REZ).

Project approval (MP10_0160) was originally granted for the project in 2012. MP10_0160 has been modified five times, with the current consolidated approval broadly comprising construction and operation of the project in two stages. Stage 1 has been fully constructed and is operational. The previous layout for Stage 2 was approved by the Independent Planning Commission (IPC) under Modification 6 to MP10_0160 (MOD6) in 2019.

Since the approval of MOD6, wind turbine generator (WTG) technology has continued to improve. WRWFPL are investigating options to further modify Stage 2 to:

- increase Stage 2 of the project's generation capacity
- reduce the number of WTGs in Stage 2 from 48 to 26 resulting in refinement to the WTG layout, electrical reticulation network and access tracks
- alter WTG specifications
- add a battery energy storage system (BESS).

The purpose of this letter is to seek the agreement of the consent authority on the process to modify the project in accordance with the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and NSW *Environmental Planning and Assessment Regulation 2021* (EP&A Reg). This letter sets out an overview of the project, provides a description of the proposed modification, and includes an outline of the approach to assessing the proposed changes in a modification report. The modification report will be prepared in accordance with the *State significant development guidelines – preparing a modification report* (DPIE 2022).

2 Approved project

Project approval (MP10_0160) was originally granted for the project on 10 July 2012 by the former NSW Department of Planning and Infrastructure (DPI), now NSW Department of Planning, Housing and Infrastructure (DPHI), under delegation by the former NSW Minister for Planning and Infrastructure (now NSW Minister for Planning and Public Spaces) under the former Part 3A of EP&A Act. MP10_0160 has been subsequently modified five times¹, with the current consolidated approval broadly comprising construction and operation of the project, with a total of 118 WTGs to be constructed in two stages:

- Stage 1 has been completed and involved the installation of 70 WTGs, grid connection components (including a new 132 kilovolt (kV)/330 kV substation and 13-km-long 132 kV transmission line providing connection to the existing Inverell-Glen Innes 132 kV transmission line north of the project), monitoring masts and ancillary infrastructure. Stage 1 has been fully constructed and is operational.
- Stage 2 allows the installation of up to 48 WTGs, construction of temporary construction facilities, additional monitoring masts and revised layouts for internal 33 kV overhead transmission lines and 33 kV underground cable routes. It also allows for connection to the existing Queensland-NSW Interconnector (QNI) 330 kV transmission line west of the project through construction of a 13-km-long 132 kV transmission line and a 132 kV/330 kV substation adjacent to the QNI line (approved as part of Modification 4 to MP10_0160 (MOD4)). Construction has not commenced for Stage 2.

In 2011, the project was referred to the former Commonwealth Department of Sustainability, Environment, Water, Population and Communities (DSEWPC), now Commonwealth Department of Climate Change, Energy, the Environment and Water (Commonwealth DCCEEW) to determine whether it should be considered a 'controlled action' under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The referral decision confirmed that the project was not a 'controlled action' and no further assessment or approval under the EPBC Act was required. Modifications 2 to 5 to MP10_0160 were not referred under the EPBC Act.

MOD6 was referred and Stage 2 was declared a 'controlled action' under the EPBC Act due to the potential for significant impacts to matters of national environmental significance (MNES). The assessment process was not accredited under the Bilateral Agreement between the NSW and Commonwealth governments, and a separate assessment process was undertaken by the then Commonwealth Department of Agriculture, Water and the Environment (DAWE), now DCCEEW, in accordance with the EPBC Act. Approval was granted on 18 March 2020 to construct and operate Stage 2 of the project (EPBC 2018/8156) by the Acting Assistant Secretary, Environment Approvals and Wildlife Trade Branch of DAWE, under delegation from the Commonwealth Minister for the Environment.

¹ Modification 1 (MOD1) was withdrawn by the proponent.

3 Proposed modification

3.1 Description of the proposed modification

WRWFPL are seeking to modify Stage 2 to accommodate improvements in WTG technology. The proposed modification will:

- increase Stage 2 of the project's generation capacity (because of the more efficient WTG model)
- reduce the number of WTGs in Stage 2 from 48 WTGs to 26 WTGs
- refine the WTG layout, electrical reticulation network and access tracks
- add a BESS (allowing for either centralised or de-centralised)
- alter WTG specifications, including:
 - increasing the upper tip height to up to 275 m
 - increasing the hub height to up to 175 m
 - increasing the blade length to up to 100 m
 - increasing the minimum tip height to 45 m
- require local road upgrades to facilitate oversize overmass (OSOM) movements.

The objective of these changes is to increase the overall generating capacity of the project, utilise WTG and BESS technology with increased efficiency and flexibility for interfacing with the National Electricity Market (NEM) for Stage 2, and to improve the viability of the project.

The selection of the preferred WTG layout for the proposed modification has included consideration of the suitability of the Stage 2 layout for the preferred WTG model, based on:

- on-site monitoring data and yield analysis resulting in an optimised layout and design that reduces wake effects and turbulence, resulting in maximised generation potential and longevity for Stage 2
- review of site constructability characteristics (including site-specific information obtained from the construction of Stage 1)
- review and mitigation of potential impacts including biodiversity and Aboriginal heritage constraints
- host landowner preferences
- setbacks from associated and non-associated residences (to mitigate operational noise, visibility of project infrastructure, shadow flicker, aviation safety, and risk of telecommunications interference).

A comparison between the approved project (MP10_0160) and the proposed modification is provided in Table 3.1 and shown on Figure 3.1.

An indicative disturbance footprint for the proposed modification is provided on Figure 3.1. The disturbance footprint will be optimised throughout the preparation of the modification application and modification report to avoid and minimise impacts based on the outcomes of supporting technical assessments and stakeholder engagement.

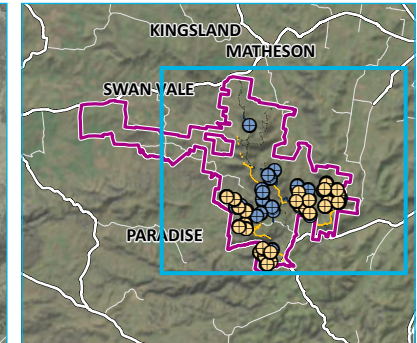
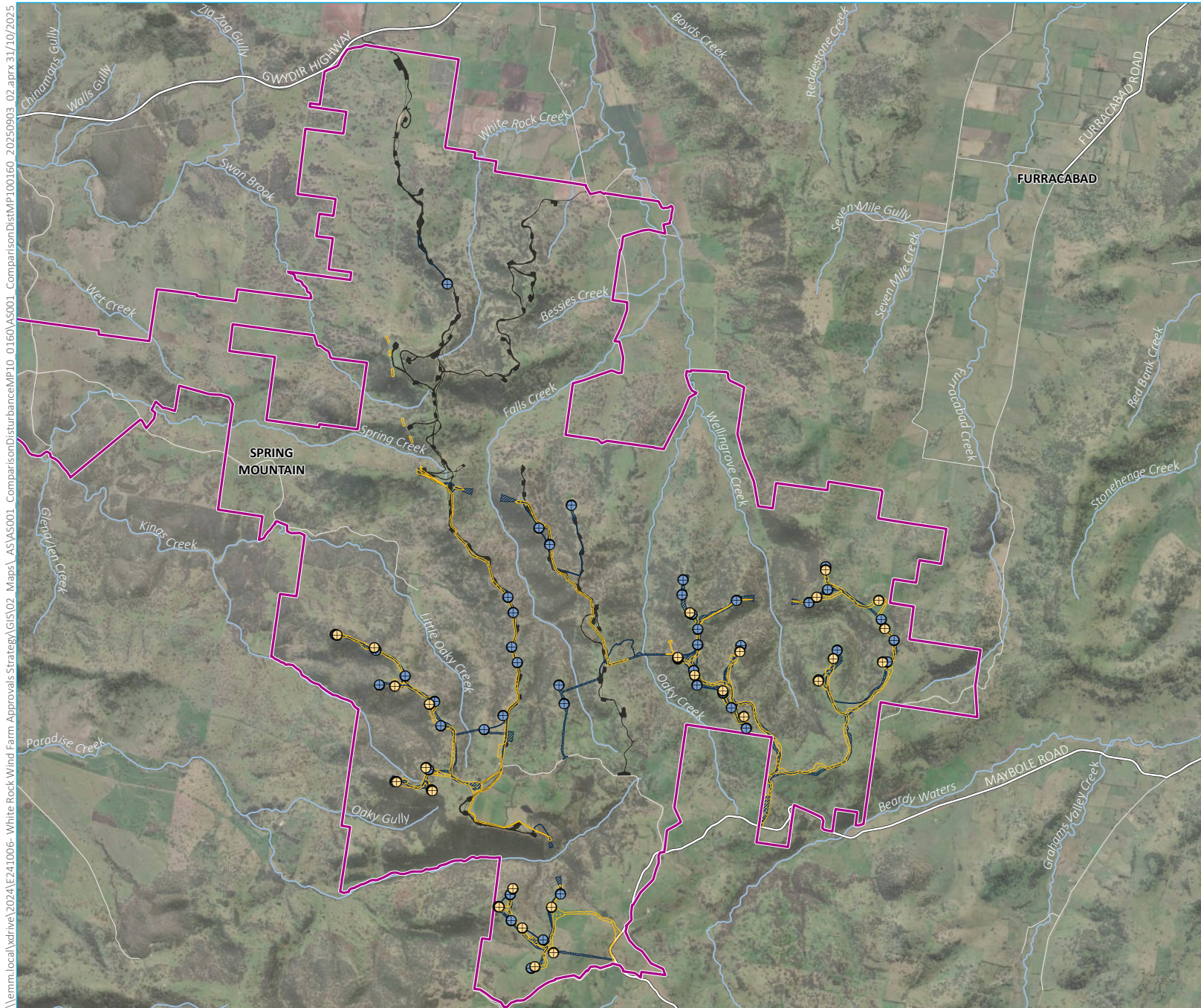
Table 3.1 Proposed modification to MP10_0160

Aspect	Approved (MP10_0160 as modified)	Proposed modification (i.e. MOD7)
Project area	15,053 hectares (ha)	No change.
Indicative disturbance footprint	184 ha (refer to ‘approved MOD6 disturbance footprint’ on Figure 3.1)	211 ha (refer to ‘proposed MOD7 disturbance footprint’ on Figure 3.1) – this layer is subject to change. The indicative disturbance footprint has increased due to increased WTG hardstand requirements, increased construction laydown area sizing, and inclusion of BESS options. Contingency locations for laydown areas have also been included. It is anticipated that the disturbance footprint will reduce prior to construction.
Generation capacity	Approximately 350 megawatts (MW)	Approximately 435 MW
Storage capacity	None.	A BESS with capacity of up to approximately 200 MW (AC or DC coupled) and with provision for up to two hours of storage (400 megawatt hours (MWh)).
Project stages and key infrastructure	<p>The project will be developed in two stages:</p> <ul style="list-style-type: none"> • Stage 1 – construction and operation of: <ul style="list-style-type: none"> – 70 WTGs – access tracks – electrical reticulation (including a combination of underground and overhead transmission lines) – on-site substation – a 132 kV transmission line connecting the on-site substation to Transgrid’s 132 kV line (adjacent to the Gwydir Highway) – operation and maintenance (O&M) facilities – temporary construction facilities – permanent meteorological monitoring masts. • Stage 2 – construction and operation of: <ul style="list-style-type: none"> – 48 WTGs – access tracks – electrical reticulation (including a combination of underground and overhead transmission lines) – on-site substation – an alternative grid connection, including a 132 kV transmission line connecting the on-site substation to a new switch yard and substation adjacent to Transgrid’s 330 kV line – O&M facilities – temporary construction facilities – permanent meteorological monitoring masts. 	<p>Stage 1 No change.</p> <p>Stage 2 Modified to include construction and operation of 26 WTGs and BESS infrastructure.</p>

Aspect	Approved (MP10_0160 as modified)	Proposed modification (i.e. MOD7)
WTG specifications	<p>Stage 1 (as constructed)</p> <ul style="list-style-type: none"> • Number of WTGs: 70 • Maximum tip height: 150 m • Minimum tip height: 29 m • Hub height: 89 m • Rotor diameter: 121 m • Blade length: 59 m • Nominal power per WTG: up to 2.5 MW • Generation capacity: approximately 175 MW <p>Stage 2 (as approved)</p> <ul style="list-style-type: none"> • Number of WTGs: 48 • Maximum tip height: 200 m • Minimum tip height: 30 m • Hub height: 115 m–130 m • Rotor diameter: up to 170 m • Rotor swept area (RSA) per WTG: up to 22,698 square metres (m²) • Blade length: up to 85 m • Nominal power per WTG: up to 3.6 MW • Generation capacity: approximately 173 MW • Total RSA for Stage 2: 1,089,500 m² 	<p>Stage 1</p> <p>No change.</p> <p>Stage 2</p> <ul style="list-style-type: none"> • Number of WTGs: 26 • Maximum tip height: up to 275 m • Minimum tip height: at least 45 m • Hub height: up to 175 m • Rotor diameter: up to 204 m • RSA per WTG: up to 32,685 m² • Blade length: up to 100 m • Nominal power per WTG: up to 10 MW • Generation capacity: 260 MW • Total RSA for Stage 2: 849,813 m²
Workforce	Approximately 250 personnel during peak construction. Up to 20 full-time employees and varying numbers of contractors during operation.	No change.
Hours of operation	Standard day time construction hours (7.00 am to 6.00 pm Monday to Friday and 8.00 am to 1.00 pm Saturday). Exceptions to these hours may include: <ul style="list-style-type: none"> • activities that are inaudible at any non-associated residence • activities approved under an out-of-hours (OOHW) work protocol (refer to Condition E22 b(vi) of MP10_0160) • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons • emergency work to avoid the loss of lives, property and/or prevent environmental harm. 	No change.
Project life	Construction: approximately 18 months for Stage 2. Operation: 25–30 years with the potential to extend the operational life.	Construction: up to 24 months for Stage 2. Operation: No change.

Aspect	Approved (MP10_0160 as modified)	Proposed modification (i.e. MOD7)
Roads	<p>Stage 1 – is accessible from Gwydir Highway, Ilparran Road, Maybole Road and Kelleys Road.</p> <p>Stage 2 – is also accessible from Gwydir Highway, Ilparran Road, Kelleys Road and Maybole Road.</p> <p>An internal network of access tracks within the disturbance footprint will be used.</p> <p>Access to the 132 kV overhead transmission line and 330 kV substation is from Gwydir Highway.</p> <p>Upgrades to local and regional roads (as described in Section 5 of the <i>White Rock Wind Farm Stage 1 Construction Traffic and Access Management Plan</i> (CTAMP) (ERM 2017)).</p>	<p>Stage 1 – No change.</p> <p>Stage 2 - No change.</p>
Transport	<ul style="list-style-type: none"> • Maximum daily heavy vehicle movements (construction, upgrading and decommissioning): 208 • Maximum daily light vehicle movements (construction, upgrading and decommissioning): 70 <p>Movements account for one vehicle entering the site and one vehicle leaving the site.</p> <p>Daily heavy vehicle movements exclude restricted access vehicles (RAVs), which will be used to transport WTG and infrastructure components from Port of Brisbane or Port of Newcastle. Based on the approved MOD6 layout, it is estimated that there would be approximately 556 OSOM deliveries.</p> <p>Plant, equipment and other bulk construction materials will be sourced based on availability of suppliers/contractors.</p>	<p>No changes are expected to maximum daily heavy and light vehicle movements.</p> <p>The reduction in the number of WTGs is expected to reduce the number of OSOM deliveries to approximately 316 (43% decrease).</p> <p>No change.</p>
Subdivision	<p>Subdivision of lots may be required to create new allotments for the substations and switchyards.</p> <p>Note: Approval for subdivision of the lots associated with the 330 kV substation was provided as part of MOD5.</p>	Possible minor change.
Decommissioning and rehabilitation	<p>Decommissioning and rehabilitation will be undertaken in accordance with the rehabilitation objectives in Table 3 of Condition G8 of MP10_0160.</p>	No change.
Offset staging	<p>MP10_0160 considers the staged retirement of the project's biodiversity credit liability.</p> <p>The Tangari offset site was established to generate credits for Stage 1 and Stage 2. Stage 1 credits have been retired.</p>	<p>A review of the biodiversity offset package is required, with potential update in credit requirements prior to the commencement of construction of Stage 2.</p>

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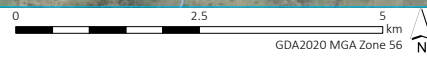


- KEY**
- Project area
 - WTG location (proposed)
 - WTG location (approved)
 - Mod7 disturbance footprint (proposed)
 - Mod6 disturbance footprint (approved)
 - Stage 1 disturbance footprint (constructed)
- Existing environment
- Major road
 - Minor road
 - Named watercourse

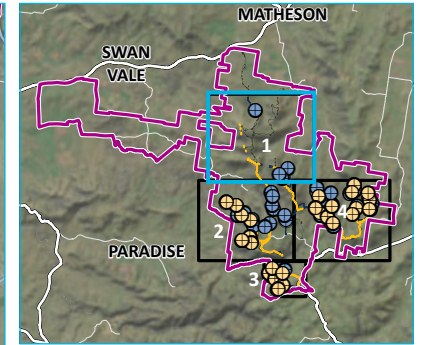
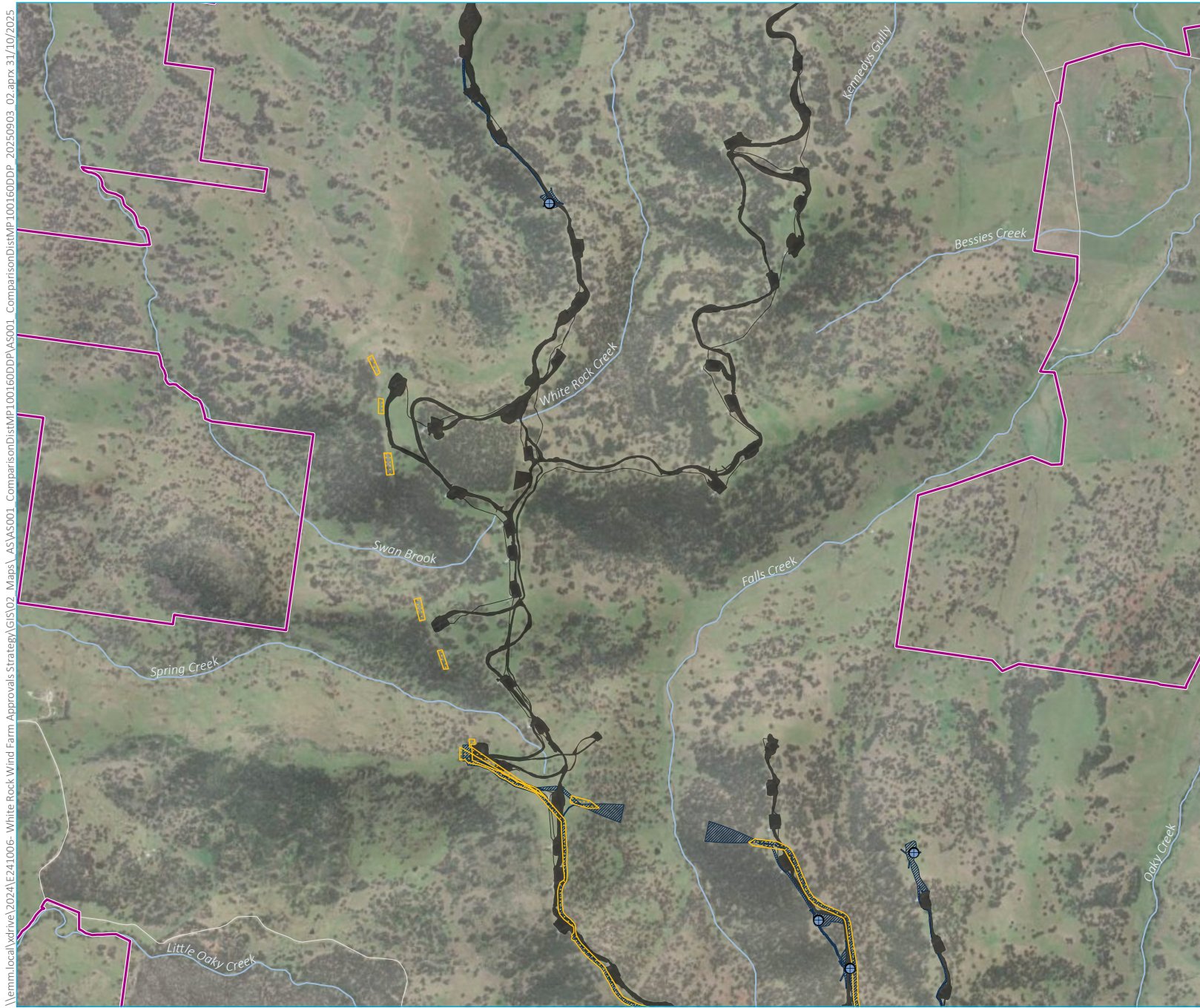
Comparison of approved and proposed disturbance (MP 10_0160) - overview

White Rock Wind Farm MOD7
Scoping Letter
Figure 3.1








Source: EMM (2025); GoldWind (2025); DCSSS (2024); ESRI (2025); GA (2009)



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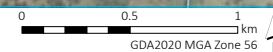


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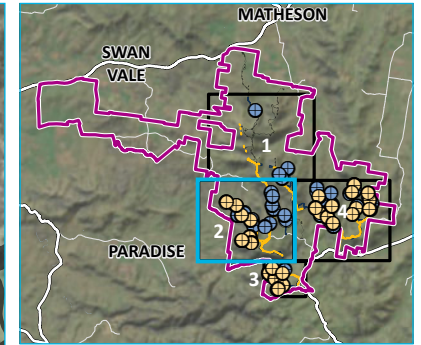
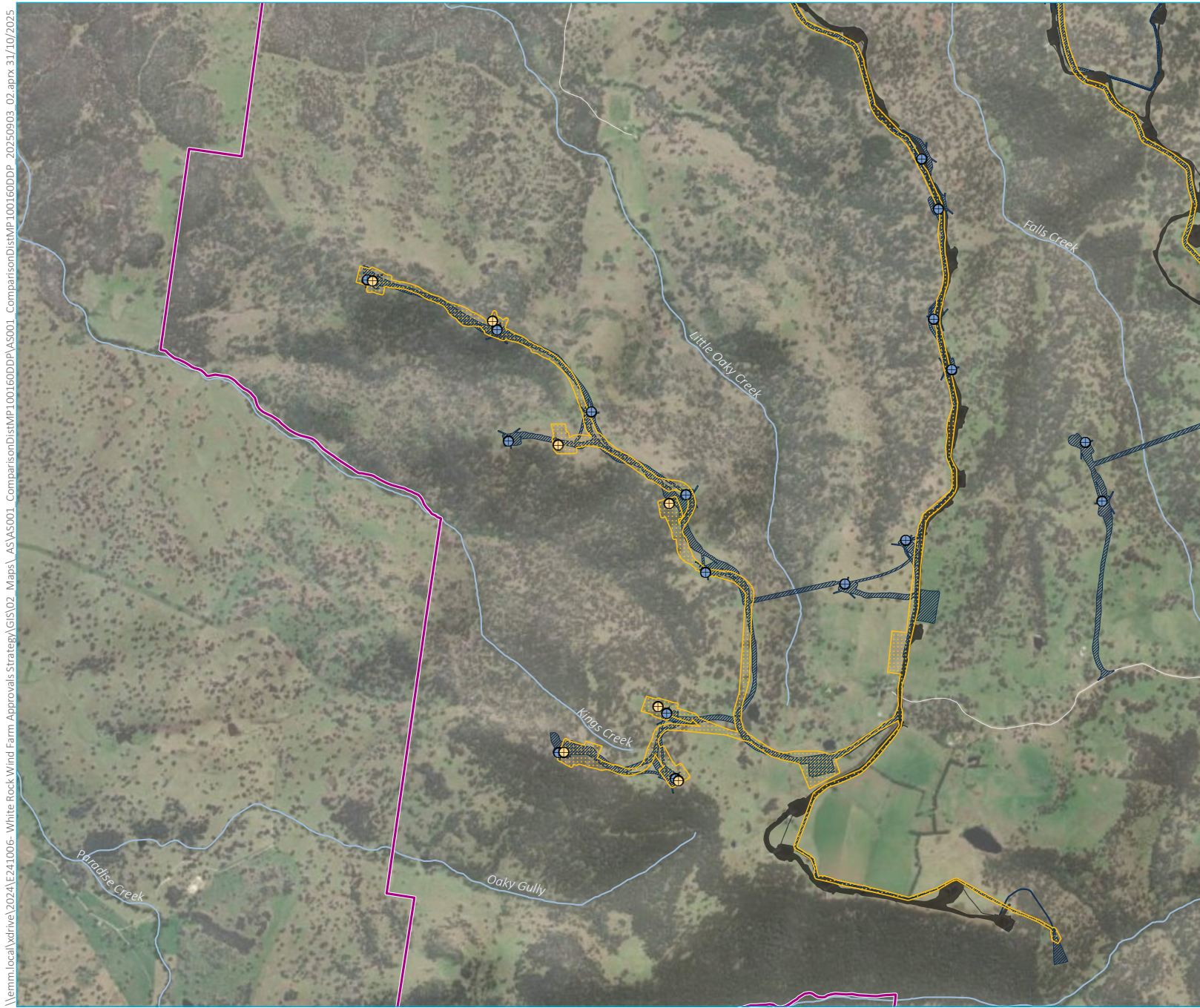
-  Project area
 -  WTG location (approved)
 -  MOD7 disturbance footprint (proposed)
 -  MOD6 disturbance footprint (approved)
 -  Stage 1 disturbance footprint (constructed)
- Existing environment
-  Minor road
 -  Named watercourse

Comparison of approved and proposed disturbance (MP 10_0160)
 Northern segment
 Map 1 of 4
 White Rock Wind Farm MOD7
 Scoping Letter
 Figure 3.1

Source: EMM (2025); Goldwind (2025); DCSSS (2024); ESRI (2025); GA (2009)



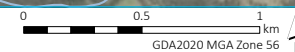
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- KEY**
- Project area
 - WTG location (proposed)
 - WTG location (approved)
 - MOD7 disturbance footprint (proposed)
 - MOD6 disturbance footprint (approved)
 - Stage 1 disturbance footprint (constructed)
- Existing environment
- Minor road
 - Named watercourse

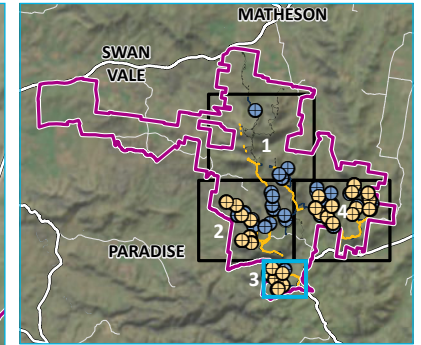
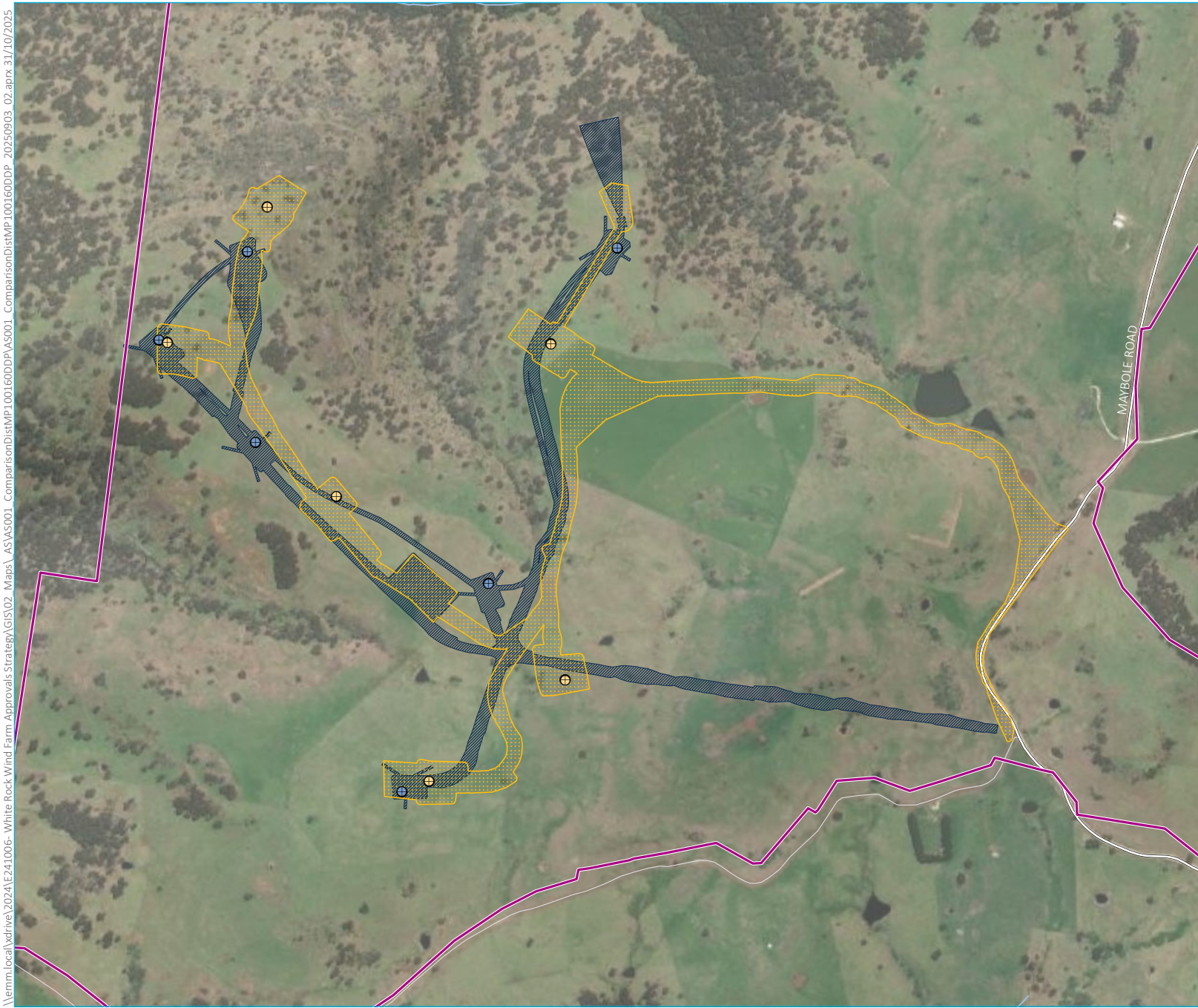
Comparison of approved and proposed disturbance (MP 10_0160)
 Western segment
 Map 2 of 4
 White Rock Wind Farm MOD7
 Scoping Letter
 Figure 3.1

Source: EMM (2025); Goldwind (2025); DCSSS (2024); ESRI (2025); GA (2009)



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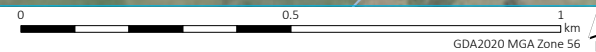
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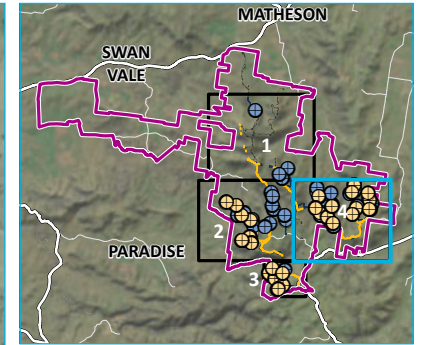
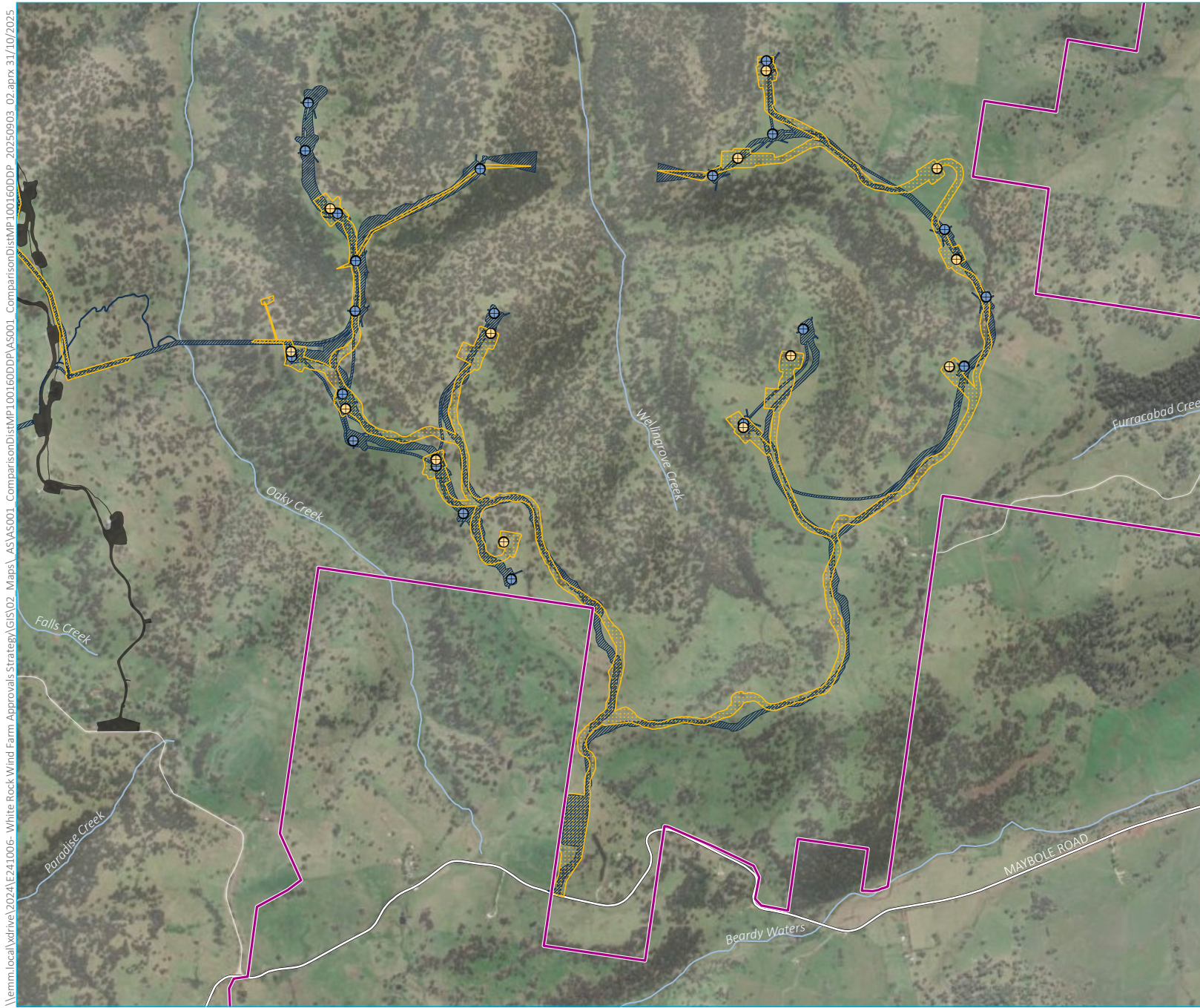
KEY

- Project area
 - WTG location (proposed)
 - WTG location (approved)
 - MOD7 disturbance footprint (proposed)
 - MOD6 disturbance footprint (approved)
- Existing environment
- Major road
 - Minor road
 - Named watercourse

Comparison of approved and proposed disturbance (MP 10_0160)
 Southern segment
 Map 3 of 4
 White Rock Wind Farm MOD7
 Scoping Letter
 Figure 3.1



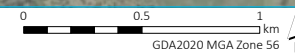
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- KEY**
- Project area
 - WTG location (proposed)
 - WTG location (approved)
 - MOD7 disturbance footprint (proposed)
 - MOD6 disturbance footprint (approved)
 - Stage 1 disturbance footprint (constructed)
- Existing environment
- Major road
 - Minor road
 - Named watercourse

Comparison of approved and proposed disturbance (MP 10_0160)
 Eastern segment
 Map 4 of 4
 White Rock Wind Farm MOD7
 Scoping Letter
 Figure 3.1

Source: EMM (2025); Goldwind (2025); DCSSS (2024); ESRI (2025); GA (2009)



3.2 Approval pathway

The modification pathway under the EP&A Act that was applicable to the previous modifications to MP10_0160 (i.e. a modification under section 75W of Part 3A of the EP&A Act) is no longer available. Accordingly, the proposed modification to MP10_0160 will be considered under section 4.55 of the EP&A Act.

Under section 4.55 of the EP&A Act, a consent authority may grant a modification if it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted. However, as the previous modifications were approved under section 75W of the EP&A Act, the comparison needs to be made against the project as last modified under section 75W (i.e. in MOD6), rather than as originally approved in 2012.

A comparison between the project as approved and the project as proposed to be modified is provided in Table 3.1. This table demonstrates:

- the project, if modified, will have the same underlying use and purpose as an energy generating project
- the project area is unchanged to that approved
- there may be a marginal increase to the disturbance footprint – this is not expected to be significant when compared to the total disturbance footprint of the project as approved
- while the proposed modification will lead to an increase in the approved generation capacity of the project (from approximately 350 MW to 435 MW), the number of WTGs will be reduced from 118 to 96, and the efficiency of the project will be significantly improved
- while the size and scale of the individual WTGs increases from those approved, the total RSA as a result of the proposed modification would be reduced
- the number of WTG components will decrease
- no changes are expected to approved:
 - site access
 - daily heavy and light vehicle movements
 - hours of operation
 - construction and operational workforce.

Therefore, the consent authority can be satisfied that the development, as modified, is substantially the same development as that approved under the former Part 3A of the EP&A Act, meaning the modification application is appropriate under section 4.55(2) of the EP&A Act. Further justification that the proposed modification meets the requirements of section 4.55 of the EP&A Act will be made in the modification report.

4 Assessment approach

A summary of the assessment approach for the proposed modification is provided in Table 4.1.

Table 4.1 Assessment approach

Aspect	Assessment approach overview
Biodiversity	<p>A meeting was held with CPHR on the proposed modification in October 2025. At the meeting, CPHR recommended WRWFPL discuss the proposed biodiversity assessment and offset strategy for MOD7 with DPHI. A biodiversity development assessment report (BDAR) will be prepared to consider potential biodiversity impacts within the proposed MOD7 disturbance footprint. Additional BAM plots and targeted species surveys will be required and will be used to calculate any additional offset liability associated with the modified project.</p> <p>Biodiversity surveys commenced in September 2025 for the proposed modification. A study area of approximately 430 ha has been identified and assumes that no further survey of areas previously approved for disturbance as part of MOD6 will be required.</p> <p>An updated collision risk model (CRM) will be prepared as part of the BDAR. The CRM will be used to inform the Bird and Bat Adaptive Management Program (BBAMP), a requirement of Condition C6 of Schedule C of MP10_0160. It is anticipated that the reduction in WTG numbers, reduction in total RSA, and increase in minimum blade tip height, following the proposed modification, will result in an overall reduction in collision risk for bird and bat species.</p> <p>Biodiversity impacts for MOD6 were assessed in accordance with the former provisions of the <i>Framework for Biodiversity Assessment (FBA)</i> and <i>NSW Threatened Species Conservation Act 1995</i>. Condition C7 of MP10_0160 addresses the project's biodiversity offset requirements. WRWFPL propose to retire all ecosystem credits for MOD6 from the Tangari Biobank Site. This process will be efficient and straightforward as the credits required for MOD6 were calculated in accordance with the FBA and FBA credits are available at the Tangari Biobank Site. Following credit retirement, WRWFPL will seek a statement of reasonable credit equivalence to confirm any remaining credits at the Tangari Biobank site. This will convert the FBA credits to credits calculated in accordance with the current provisions (i.e. the <i>Biodiversity Assessment Method</i>) and will simplify the retirement of credits for MOD7.</p> <p>The MOD7 credit liability will be calculated based on the proposed MOD7 disturbance footprint and will not consider areas previously assessed and approved for disturbance. If suitable credits are available at Tangari Biobank site, these will be used preferentially to any other offset mechanisms.</p>
Aboriginal heritage	<p>An Aboriginal cultural heritage assessment (ACHA) will be prepared to consider potential impacts on Aboriginal cultural heritage within the proposed MOD7 disturbance footprint. The ACHA will require additional surveys with registered Aboriginal parties (RAPs).</p>
Historic heritage	<p>No historic heritage sites have been identified to date during desktop research or targeted field surveys. Additional surveys completed as part of the ACHA will be used to supplement surveys completed as part of previous historic heritage assessments. The modification report will summarise survey outcomes and identify any additional management or mitigation measures that may be required.</p>
Landscape and visual	<p>MOD7 seeks to increase WTG tip height compared with MOD6; however, there will be a significant reduction in WTG numbers. This is anticipated to result in a reduction in visual impacts.</p> <p>It is anticipated that a centralised BESS at the 330 kV substation will have limited visibility from Gwydir Highway and non-associated residences. Decentralised BESSs at individual WTG hardstands are also expected to have low visual impacts.</p> <p>Clarification is sought on DPHI's expectations for a landscape and visual impact assessment (LVIA) for the proposed modification and requirements for alignment with the <i>Wind Energy Guideline</i> (DPHI 2024) and supporting <i>Technical Supplement for Landscape Character and Visual Impact Assessment</i> (DPHI 2024). It is understood that the guideline and supporting technical supplement must be considered when preparing and assessing applications to modify an SSD consent for wind energy development; however, given the significant reduction in WTGs, WRWFPL is seeking clarification from DPHI on the extent and process to which landscape character and visual impacts must be reevaluated for the proposed modification. Clarification is also sought on the preferred methodology to compare approved and proposed impacts.</p>

Aspect	Assessment approach overview
Noise and vibration	<p>The selected WTG model varies significantly from those considered for MOD6; however, noise specifications may still result in compliance at the closest non-associated residences, particularly with the proposed reduction in WTG numbers.</p> <p>Clarity on agreements with non-associated residences will be needed in respect of applicable noise amenity criteria. Background noise monitoring data and criteria have been established through Condition F7 of MP10_0160, and updates to the operational noise assessment will be undertaken in accordance with the <i>Wind Energy Guideline</i> (DPHI 2024a) and supporting <i>Technical Supplement for Noise Assessment</i> (DPHI 2024b). The construction noise model will also be updated to consider construction noise within the proposed MOD7 disturbance footprint (including any local road or intersection upgrades), as well as any amendments to the location of blasting.</p> <p>The BESS will also require consideration in construction and operational noise modelling. If a centralised BESS is constructed at the 330 kV substation, it will be distant from non-associated residences and is expected to have low noise impacts. A decentralised BESS at each WTG is also expected to have minimal contribution to overall operation noise impacts.</p>
Water resources	<p>Impacts to water resources will be assessed within the modification report. The focus will be the identification of any new interactions with mapped watercourses and confirmation that the existing management and mitigation measures will be suitable to address any additional impacts.</p>
Air quality	<p>Air quality impacts will be assessed within the modification report. The focus will be consideration of potential air quality impacts from construction activities within the proposed MOD7 disturbance footprint, as well as any amendments to blasting locations.</p>
Traffic and transport	<p>Traffic impacts will be reassessed if there are changes to the proposed site access locations and/or daily and peak hourly light and heavy vehicle movements. The construction traffic assessment will also need to consider where the project's construction workforce travel from each day to get to site. Consideration of cumulative traffic impacts from the concurrent construction of the project and other renewable energy and transmission projects within the New England REZ may also be required.</p> <p>The OSOM access route will be reassessed because of the proposed changes to WTG specifications (including increased blade length and tower height). Where road upgrades are required between the port of origin and the site, impacts associated with these upgrades will be assessed as part of the modification application (including consideration of biodiversity and Aboriginal cultural heritage) and landowner's consent will be sought for any upgrades proposed as part of the proposed modification. The only exception to this will be where another party (e.g. Energy Corporation of NSW) has publicly committed to road upgrades that will address the project's requirements.</p>
Land	<p>Land, soils and agriculture impacts will be assessed within the modification report. The focus will be confirmation that the existing management and mitigation measures will be suitable to address any additional impacts.</p>
Contamination	<p>Contamination risk will be assessed within the modification report. The focus will be confirmation that the existing management and mitigation measures will be suitable to address any additional impacts.</p>
Aviation safety	<p>Whilst there will be an overall reduction in the number of WTGs, the increased blade tip height and alternative WTG layout, could result in changes to the project's aviation impacts. Searches for local flight paths and aviation infrastructure will be updated as part of the proposed modification and impacts on aviation will be assessed within the modification report.</p>
Electromagnetic fields	<p>Impacts from electromagnetic fields can be assessed within the modification report.</p>
Telecommunications	<p>Whilst there will be an overall reduction in the number of WTGs, the increased blade tip height and alternative WTG layout could result in changes to the project's interactions with the existing telecommunications network. Searches for local telecommunications infrastructure will be updated as part of the proposed modification and impacts on telecommunications will be assessed within the modification report.</p>
Blade throw	<p>Whilst there will be an overall reduction in the number of WTGs, the increased blade length and alternative WTG layout, could result in changes to the project's blade throw risk. An updated assessment of blade throw risk will be prepared as part of the modification report.</p>

Aspect	Assessment approach overview
Shadow flicker	Whilst there will be an overall reduction in the number of WTGs, the increased blade length and alternative WTG layout, could result in changes to the shadow flicker impacts. An updated shadow flicker assessment will be prepared as part of the modification report.
Bushfire	Bushfire risk will be assessed within the modification report. The focus will be confirmation that the existing management and mitigation measures will be suitable to address any additional impacts.
Waste	Waste management will not change significantly because of the proposed modification and will be considered in the modification report. The volume of packaging may reduce based on the reduction in WTG numbers. The focus will be confirmation that the existing management and mitigation measures will be suitable to manage waste generated by the construction and operation of Stage 2.
Social	Clarification is sought on DPHI's expectations for a social impact assessment (SIA) for the proposed modification and requirements for alignment with the <i>Social Impact Assessment Guideline</i> (DPHI 2025). Whilst there will be an overall reduction in the number of WTGs, the proposed modification may increase the visibility of WTGs and impact local roads, infrastructure and the availability of housing and/or short-term accommodation during construction. As part of the preparation of the modification report, consideration will be given to where the project's workforce will be housed during construction.
Economic	Economic impacts will be assessed within the modification report. The focus will be local and regional economic benefits and creation of employment opportunities during construction and operation.
Cumulative impacts	Potential cumulative impacts will be assessed in supporting technical assessments. The findings of these assessments will be consolidated within a separate cumulative impacts chapter in the modification report, in accordance with the <i>Cumulative Impact Assessment Guideline for State Significant Projects</i> (DPIE 2022). Consideration of cumulative impacts will consider any additional information available on construction overlaps with neighbouring developments.

5 Engagement

Engagement priorities for the proposed modification are provided in Table 5.1.

Table 5.1 Engagement priorities

Key stakeholder	Engagement content	Timing
DPHI	<ul style="list-style-type: none"> Introduce the proposed modification. Confirm the approval pathway, assessment and engagement expectations. Confirmation of approach to offsetting. Provide schedule overview. 	November 2025
CPHR	<ul style="list-style-type: none"> Introduce the proposed modification. Confirm assessment expectations (including BBUS and CRM). Discuss approach to offsetting previously assessed and approved disturbance. Consider coordinating a site visit with assessment officers. 	October 2025
Heritage NSW	<ul style="list-style-type: none"> Introduce the proposed modification. Confirm assessment expectations (including requirements to recommence the consultation process for the ACHA). 	December 2025
Transport for NSW and Energy Corporation of NSW	<ul style="list-style-type: none"> Introduce the proposed modification. Receive an update on the status of any planned upgrades for the New England REZ (including road and intersection upgrades). 	November 2025
Commonwealth DCCEEW	<ul style="list-style-type: none"> Introduce the proposed modification. Confirm the approval pathway and assessment expectations. 	Once impacts to MNES are understood

Key stakeholder	Engagement content	Timing
Councils (Glen Innes Severn and Inverell)	<ul style="list-style-type: none"> • Introduce the proposed modification. • Present the assessment approach and engagement strategy. • Provide schedule overview. 	November 2025
Closest non-associated residences	<ul style="list-style-type: none"> • Introduce the proposed modification. • Invite feedback on the proposed modification and WTG layout. • Present the assessment approach. • Seek interest in neighbour agreements for the modified project. • Provide schedule overview. 	December 2025
Local community	<ul style="list-style-type: none"> • Introduce the proposed modification. • Present the assessment approach and engagement strategy. • Provide schedule overview. 	December 2025

6 Conclusion

WRWFPL intends to modify the project to reduce the number of WTGs, alter WTG specifications and add a BESS. The proposed modification will increase the project’s generating capacity, provide greater flexibility for interfacing with the NEM and improve the viability of the project.

The intended approval pathway is under section 4.55(2) of the EP&A Act, on the basis that the modified project will be substantially the same development as the development for which approval was granted. As previous modifications to MP10_0160 were approved under section 75W of the EP&A Act, the comparison will be made against the project as last modified under section 75W, rather than as originally approved in 2012.

A modification application will be submitted via the Major Projects Portal and a corresponding modification report will be prepared and is intended to be submitted in 2026.

Please do not hesitate to contact me if you’d like to discuss this further.

Yours sincerely,



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