

MEMO

TO	Nicole Brewer, Director, Energy Assessments
FROM	Mark Davey
DATE	17 July 2026
OUR REFERENCE	0617753
SUBJECT	Keri Keri Wind Farm (SSD-3858962) Request for Additional Information

Dear Nicole,

Keri Keri Wind Farm (SSD-3858962)–Request for Additional Information

We refer to the Department of Planning, Housing and Infrastructure (DPHI) request for additional information [dated 20 April 2026] to assist in their assessment of the Keri Keri Wind Farm (the Project).

The DPHI has requested that the Applicant provide a response to advice received from the following agencies relating to the Project Submissions Report (ERM, 2026a) and Amendment Report (ERM, 2026b):

- Conservation Programs, Heritage and Regulation Group (CPHR) and National Parks and Wildlife Service (NPWS) dated 19 February 2026 [**Table 1-1**];
- Transport for NSW dated 11 March 2026 [**Table 1-2**];
- Heritage NSW (Aboriginal Cultural Heritage) dated 6 February 2026 [**Table 1-3**];
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group dated 2 March 2026 [**Table 1-4**];
- Edward River Council dated 13 March 2026 [**Table 1-5**];
- Hay Shire Council dated 23 January 2026 [**Table 1-6**];
- Murray River Council dated 16 March 2026 [**Table 1-7**]; and
- State Emergency Services (SES) dated 3 February 2026 [**Table 1-8**].

Separately, the DPHI has requested the Applicant provide:

- A consolidated list of affected lots, including road reserves, and corresponding landowners consent, to reflect the amended project (**Attachment A**); and
- An updated subdivision plans that detail the area/size of the proposed lots (**Attachment B**)

The Amended Biodiversity Development Assessment Report (BDAR) is provided in **Attachment C**.

The Addendum Traffic Impact Assessment (TIA) is provided in **Attachment D**.

The Addendum Aboriginal Cultural Heritage Assessment Report (ACHAR) is provided in **Attachment E**.

The following agency advice required no action other than acknowledgement:

- Heritage Council of NSW, dated 27 January 2026 [**Table 1-9**];
- Water NSW, dated 22 January 2026 [**Table 1-10**];
- NSW Crown Lands, dated 11 February 2026 [**Table 1-11**];
- NSW Department of Primary Industries and Regional Development (DPIRD) – Fisheries, dated 3 February 2026 [**Table 1-12**];
- Fire & Rescue NSW, dated 3 February 2026 [**Table 1-13**];
- The NSW Rural Fire Service, dated 9 February 2026 [**Table 1-14**];
- Airservices Australia (no date) [**Table 1-15**];
- The Civil Aviation Safety Authority advice dated 23 January 2026 [**Table 1-16**];
- NSW Department of Primary Industries and Regional Development (DPIRD) – Agriculture and Biosecurity, dated 2 February 2026 [**Table 1-17**]; and
- NSW Environment Protection Authority, dated 2 February 2026 [**Table 1-18**].

Yours sincerely,



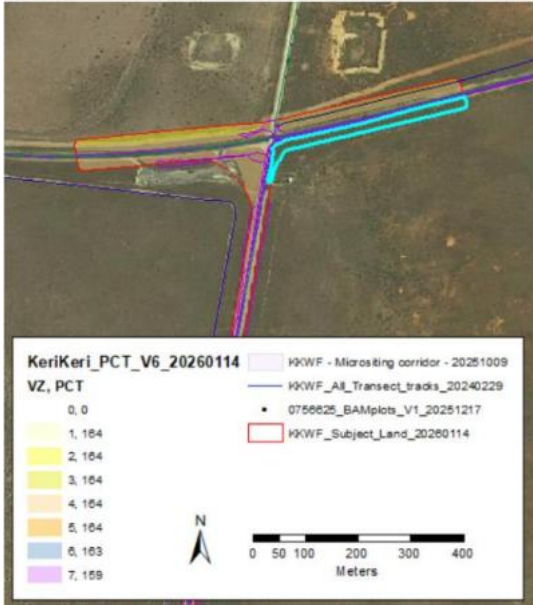
Mark Davey

Partner

1. RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM GOVERNMENT AGENCIES

TABLE 1-1 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM CPHR AND NPWS

Ref No	Theme	Submission	Response	Where Addressed
Attachment A CPHR Response to Submissions				
CPHR-01	Flooding (CPHR issue 1.1)	Actively engage with the local Council and the NSW SES to demonstrate that emergency management matters have been discussed and supported. This should inform the development of a site-specific flood emergency response plan. The proponent has not demonstrated that Murray River Council (Council) and/or the NSW State Emergency Service (SES) have been actively engaged in relation to flood emergency management matters. Table 4.4 of Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum) states that the “SES did not provide a submission during EIS exhibition” and that “Council’s submission did not identify any matters related to flooding”. The absence of relevant submissions from Council and NSW SES does not constitute evidence of proactive or meaningful engagement by the proponent. Recommend: Prior to commencing development, the proponent must actively engage with Council and NSW SES on flood related emergency management matters. Engagement must inform a site-specific flood emergency response plan that includes actions which Council and NSW SES support. The NSW SES can be contacted viarra@ses.nsw.gov.au.	Noted. The Applicant has and will continue to engage with relevant local councils (e.g., Murray River Council, Balranald Shire Council) and the NSW State Emergency Services (SES) regarding flood emergency management. Both councils and the NSW SES will be consulted during the preparation of the Flood Emergency Response Plan.	This table
CPHR-02	Flooding (CPHR issue 3-1)	Ensure future hydraulic models include the detailed designs associated with proposed project infrastructure to adequately demonstrate the impact of the project on flood behaviour. The representation of the proposed development in the Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum) hydraulic model is largely achieved through elevation and roughness adjustments in the model terrain. Subsequently Appendix H (Keri Keri Wind Farm Flood Assessment – Addendum) provides a low-resolution and inaccurate assessment of flood risk and impact. Further hydraulic modelling should incorporate the detailed design of the project infrastructure to accurately define the impacts of flood events on the site, as well as the impacts of the proposed development, including ancillary works, on flood behaviour. Recommend: As committed to in Table 4.1 of the Keri Keri Wind Farm - Submissions Report, the hydraulic model: - must be updated to include the detailed design to adequately demonstrate the impact of the proposed project on flood behaviour. - should be used to inform the detailed design, ensuring that impacts are minimised or avoided.	Noted. As necessary, hydraulic models will be updated to include the detailed design. Conversely the hydraulic model will be used to inform the detailed design, such that impacts are minimise or avoided. The applicant will continue to assess the potential impact of the project on flood behaviour as the design progresses.	This table
CPHR-03	Biodiversity (CPHR issue 5-1 and 6-1)	Provide further detail of threatened flora survey effort to demonstrate survey adequacy and revise species polygons for ‘area’ species to include all suitable habitat. There are five threatened flora species identified as candidate species in Table 5.3 of the BDAR. Lanky Buttons (<i>Leptorhynchus orientalis</i>) was also observed within the project area and should be further assessed as a candidate species in the BDAR. A review of flora survey effort identified 216 ha of suitable habitat patches >1 ha that are not covered by a 20 m buffer to all survey	- Lanky Buttons (<i>Leptorhynchus orientalis</i>) was not recorded or observed within the Project Area during surveys undertaken to inform this BDAR. There are also no previous records of this species from the Project Area. This species is associated with PCT 44, which has been completely avoided by the Project. As such, this species does not require further assessment as a candidate species in the BDAR. - Targeted flora surveys covered ~83% (i.e., 634.50 ha) of the development footprint (i.e., 764.40 ha). This quantum of survey coverage exceeds the	This table

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		tracks. The unsurveyed areas are shown in red in Figure 1 below. All threatened flora species have areas of unsurveyed suitable habitat. Figure 1. Suitable habitat areas >1 ha unsurveyed for threatened flora species  Recommend: For threatened flora species with survey coverage gaps in areas of associated PCTs, undertake further surveys, obtain an expert report, or contact the Renewable Energy Biodiversity Support team (rebs@dcceew.nsw.gov.au) to discuss assessing unsurveyed areas for assumed presence	minimum requirement for the two-phase grid method (i.e., ~150 ha of survey). As such, survey coverage is comprehensive. - Several survey tracks were not submitted as part of the Amended BDAR (ERM, 2026d) spatial data pack (as these were not available at the time of submission). Most of the missing track data have been obtained and are provided as part of this Amended BDAR V2. - GPS failure influenced the survey tracks of one ecologist for part of the September 2024 survey. These tracks were paired with data from another ecologist and, therefore, an estimate of where these tracks were is provided. - Other survey track data remains unaccounted for. These tracks are 'unpaired' tracks to tracks supplied as part of this BDAR. - The remaining 'unsurveyed' portion of the Subject Land (largely associated with areas where track data is missing) has been reduced to 41.75 ha (patches > 1 ha). - Assumed presence for species known to occur within the Project area is made for these unsurveyed areas where associated with the PCT.	
CPHR-04	Biodiversity (CPHR issue 12)	Review PCT mapping. An area of vegetation evident on aerial imagery (0.64 ha, see below Figure 2) has been attributed to PCT 0 near the corner of Keri Keri Road and Sturt Highway. Figure 2. Area of potential native vegetation assessed as PCT 0.  Recommend: Assess this area as native vegetation or provide BAM Plot or rapid data point to justify the allocation of this area to PCT 0.	The mapping error identified has been rectified. The BAM-C case has been updated with revised PCT/VZ calculations. The identified error was assigned to VZ 1 (PCT 164).	Figure 4-1, Figure 4-3, Table 4-3 of the Amended BDAR V2 (Attachment C)

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CPHR-05	Biodiversity (CPHR issue 17.4)	Revise the BBAMP in consultation with CPHR and NPWS. Recommend: Revise the draft BBAMP in consultation with CPHR and NPWS so that trigger levels, mitigation measures, monitoring requirements and issues identified below are addressed: 1. Population sizes used to calculate triggers have potentially resulted in some non-precautionary trigger levels which require review and further justification. For example, Pink Cockatoo and Sharp-tailed Sandpiper mortality trigger levels are potentially too high and some species which require inclusion have been omitted, including Glossy Ibis, Painted Snipe and Latham's Snipe. 2. Include non-threatened protected species that are likely to be at high collision risk, such as Little Raven, Galah, Australian Magpie and White-striped Free-tail Bat. 3. Revise the Trigger Action Response Plan to incorporate SMART principles that include mitigation. 4. Update the carcass search radius to 170 m for all species and remove the transect search requirements so that the entire search radius is searched. 5. Include a requirement for an adequate amount of at height bat data to provide adequate confidence to further inform the BBAMP (at least 12 months), prior to construction	The draft BBAMP is based on the results of bird and bat survey data collected to date as well as relevant supporting literature. The draft BBAMP will be finalized to the satisfaction of the consent authority following approval of the Project and prior to construction. The draft BBAMP has been updated to: • Where relevant, address perceived concerns relating to population size estimates and trigger levels, or provide a justification for the population size estimates used. • For example, for the Pick Cockatoo (<i>Lophochroa leadbeateri</i>) population estimates were taken from The Action Plan for Australian Birds (2020) and the approved draft Conservation Advice for <i>Lophochroa leadbeateri</i> (eastern Major Mitchell Cockatoo) and both provide a population estimate (as used in their assessment) of 15,000. • Include relevant non-threatened protected species that may be at high-risk to collision including the Little Raven (<i>Corvus mellori</i>), Galah (<i>Eolophus roseicapilla</i>), Australian Magpie (<i>Gymnorhina tibicen</i>) and the White-bellied Free-tailed Bat (<i>Mops niveiventer</i>). • Revise the Trigger Action Response Plan (TARP) to include specific, measurable, achievable, relevant and time-bound (SMART) principles and mitigation. • Extend the carcass search radius for all species to 170 m. • Remove the requirement for transect searches so that the entire radius is searched. • Include a requirement for an adequate amount of at-height bat data to be collected to inform future versions of the BBAMP.	Appendix A of the Amended BDAR V2 (Attachment C)
CPHR-06	Biodiversity (CPHR issue 21.1)	Revise Table 8-6 (formerly Table 8-7) to detail the mitigation and management measures implemented through post-approval plans. Recommend: • Add pest management as a mitigation measure. This was previously committed to in the EIS BDAR. • Define the criteria and map the areas that will be avoided and managed as 'Environmental Sensitive No-go zones' or 'areas of significance'. • Specify monitoring for retained threatened flora species adjoining construction areas. • Identify that wetland areas and key habitats for the Southern Bell Frog must be protected through appropriate erosion and sediment controls. • Identify where speed limits will be imposed and specify speed limits to reduce vehicle strike impacts on threatened fauna.	Table 8.6 has been reviewed and revised to capture all mitigation and management measures that will be implemented through post-approval plans.	Table 8-6 of the Amended BDAR V2 (Attachment C)
CPHR-07	Biodiversity (CPHR issue 22)	Revision of MNES assessment. Recommend: Update the MNES assessment in response to addressing the issues raised in this review. In particular, address changes to the MNES assessment associated with Issues 5.1 and 6.1 that may impact on the credit liability of EPBC species.	The MNES assessment has been updated to include revised habitat impact areas for Mossgiel Daisy (<i>Brachyscome papillosa</i>) and Chariot Wheels (<i>Maireana cheelii</i>) to reflect adjustments due to assumed presence. No other amendments were required.	Section 8.7 of the Amended BDAR V2 (Attachment C)
CPHR-08	Biodiversity (CPHR issue 24)	Update the BAM-C predicted, candidate and habitat survey tabs to be consistent with the BDAR. Recommend: Address inconsistencies between the BDAR and BAM-C by updating the BAM-C, including: • Plains-wanderer is listed as manually added in the BDAR (Table 5-1) but is missing from the BAM-C Habitat suitability: Predicted tab. • Species noted as retained for assessment in Table 5-5, White-bellied Sea Eagle, Little Eagle and Pink Cockatoo, have been removed from the Habitat suitability: Candidate tab before habitat survey results were applied.	• Plains-wanderer (<i>Pedionomus torquatus</i>) has been added as a predicted species; however, no important habitat is mapped within the Project Area. This species has been avoided. • The White-bellied Sea Eagle (<i>Haliaeetus leucogaster</i>), Little Eagle (<i>Hieraaetus morphnoides</i>) and Pink Cockatoo (<i>Lophochroa leadbeateri</i>) were removed as candidate species when applying Step 3 of the BAM (habitat constraints absent). Exclusion of these species is permitted as habitat constraints are absent and, as such, survey for these species is not required. • The Southern Bell Frog (<i>Litoria raniformis</i>) and Southern Myotis (<i>Myotis macropus</i>) have been added to the BAM-C; however, no species polygon was required as the surveys undertaken demonstrate absence.	Section 5.1 and, Section 5.2, of the Amended BDAR V2 (Attachment C)

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		- Other manually added candidate species, including Southern Bell Frog, Southern Myotis and <i>Pterostylis pedina</i>, are also missing from the BAM-C, and their survey outcomes have not been entered. - Pink Cockatoo and Little Eagle were recorded but removed from the Candidate tab rather than having their survey results documented in the Habitat Survey tab. Once updated, recalculate the credit liability and revise the BDAR accordingly.	- The orchid, <i>Pterostylis pedina</i>, has not been added to BAM-C as the option to add this species was not available. Regardless, the species was not recorded in the Subject Land and, therefore no species polygon is required. - The Little Eagle (<i>Hieraaetus morphnoides</i>) and Pink Cockatoo (<i>Lophochroa leadbeateri</i>) are dual listed species and were recorded in the Project Area as foraging individuals (i.e., ecosystem predicted species). Habitat constraints are absent from development footprint AND nominated species polygon radius from habitat features. The result is no impact on breeding habitat. No species polygon is required for these species.	
Attachment B NPWS Response to Submissions				
NPWS-01	Yanga State Conservation Area (NPWS issue 1.6)	Consider how unauthorised egress or use of parks will be managed due to the general proximity and accessibility of the lands reserved under the National Parks and Wildlife Act 1974. Recognise that, as part of all future project operational plans, use and access to Yanga State Conservation Area (Yanga SCA) is limited to activities authorised under the adopted Yanga National Park, Yanga State Conservation Area and Yanga Nature Reserve Plan of Management (DPIE, 2020). NPWS raised issues initially around potential unauthorised and undocumented access to, or use of, Yanga SCA due to the proximity and nature of the project's haulage requirements. Acciona Energy has, as part of the RTS, committed to no direct impacts on Yanga SCA. Residual risk is still a relevant consideration. Recommend: No access to, and use of, Yanga State Conservation Area as land reserved under the NSW National Parks and Wildlife Act 1974. Access may only be permitted where activities are authorised by, or under, the NSW National Parks and Wildlife Act 1974.	Noted. The Yanga State Conservation Area will not be accessed or used by the Project or Project personnel. If access is needed, the Applicant will seek an authorised approval.	This table
NPWS-02	Transmission and Grid Infrastructure (NPWS issue 2.1)	Acciona Energy and the DPHI Planning consider consolidation of, and colocation of transmission and grid connection infrastructure, so undue pressure is not placed on the adjacent land reserved under the <i>National Parks and Wildlife Act 1974</i>. NPWS requested that Acciona Energy consider allowing for the consolidation or colocation of grid connection infrastructure by negotiating with surrounding renewable projects. As the Keri Keri Wind Farm retains a prime location to access the TransGrid EnergyConnect Project. NPWS recognises that legal requirements at the time did not support negotiation between providers with respect to consolidation or colocation of transmission line grid connections. This placed pressure on NPWS, and land reserved under the National Parks and Wildlife Act 1974, as the only unsecured access point to the TransGrid EnergyConnect Transmission Line. No resolution was provided by the RTS or DPHI Planning. Recommend: NPWS requests that DPHI Planning consider standard conditioning around negotiation requirements for the consolidation or colocation of ancillary transmission and grid connection infrastructure. This should require proponents, or energy providers operating under the approval, to negotiate joint use of connections in the renewable energy zones.	Noted. The Applicant has and will continue to consult with DPHI regarding consolidation of transmission and grid connection infrastructure for this Project.	This table
NPWS-03	Noise and Vibration (NPWs issue 4.4)	Blasting is adequately assessed as part of the EIS. This shall include impacts to the values (natural and cultural) of the Yanga SCA and on the maintenance of safe access via Keri Keri Road. NPWS acknowledges that the RTS defers the environmental assessment of blasting operations to future preparation of a Blasting Plan (as and if required). The agency recognises that, due to the amended project layout, the	Noted. Geotechnical investigations are required to inform whether blasting is required for the construction of wind turbine foundations. If required, as per Section 8.3 of the NIVA, the Applicant will develop a Blasting Plan that identifies sensitive receivers. Provides appropriate buffers to these receivers, outlines	This table. Appendix G of the Amendment Report (ERM, 2026b)

Ref No	Theme	Submission	Response	Where Addressed
		risk at the immediate boundary of the development site has been reduced, with the nearest wind turbine now 1.2km from Yanga SCA, although ancillary facilities remain proximate. This has reduced the likelihood of direct impacts attributed to blasting but has not completely removed risks to Yanga SCA's values or safe access to the park via Keri Keri Road. Recommend: NPWS is consulted during the preparation of any future Blasting Plan. The plan should consider impacts to the values (natural, cultural and social) of Yanga SCA, and ensure the retention of safe and sustained access via Keri Keri Road	monitoring and management measures to avoid or minimise impacts. The Blasting Plan will include Yanga SCA and Keri Keri Road as sensitive receivers. If a Blasting Plan is developed the Applicant will consult NPWS. The plan will consider impacts to the values of Yanga SCA and ensure the retention of safe and sustained access via Keri Keri Road.	
NPWS-04	Noise and Vibration (NPWS issue 4.5)	Provide an acoustic (noise) monitoring program to ensure levels are adhered to, and the effects on Yanga SCA can be adequately reported. Acciona Energy agreed as part of the RTS to prepare a Noise Monitoring Plan for the construction phase of the project. NPWS advises that noise levels above 40dB(A) have the potential to impact critically endangered birds and other at-risk species on Yanga SCA. The noise levels during construction should be monitored on the Yanga SCA interface to ensure levels as committed to in the RTS are adhered to, and the effects on Yanga SCA are adequately reported on. Recommend: NPWS is consulted during the preparation of the Noise Monitoring Plan. The plan is to set out the acoustic monitoring on the boundary interface of Yanga SCA, ensuring that exceedance of the 40dB(A) criterion does not occur. Where exceedances are identified, they are reported on and mitigated in line with the Biodiversity Management Plan.	Noted. The Applicant commits to the preparation and implementation of a Noise Management Plan, which will include monitoring. The Amended NVIA included a representative receiver on the boundary of Yanga SCA boundary at which, monitoring for compliance of the 40 dB(A) criteria will be undertaken. If exceedances are identified, these will be reported and mitigated in line with the management plan. The Applicant will consult with NPWS when developing the noise monitoring.	This table. Appendix G of the Amendment Report (ERM, 2026b)
NPWS-05	Traffic and Transport (NPWS issue 5.5/5.6)	6 Prepare a Construction Traffic Management Plan (CTMP), confirm in consultation with council the preferred speed limits for Keri Keri Road, and ensure signage is established, which will ensure all road users comply. NPWS expressed concern about the project's use of oversized and overmass (OSOM) vehicles, the extent of ancillary construction access and the increased vehicular traffic predicted along Keri Keri Road. Acciona Energy agreed to the preparation of a CTMP, which included NPWS recommendations. Recommend: NPWS is consulted during the preparation of the Construction Traffic Management Plan. The plan is to establish speed limits on Keri Keri Road, a Drivers' Code of Conduct to manage road user safety and ensure safe access to Yanga SCA via Keri Keri Road is maintained.	Noted. The Applicant commits to preparing a Traffic Management Plan (TMP) in consultation with NPWS. A Drivers Code of Conduct will be included in the TMP and driving safety will be discussed in staff and contractor inductions. The Applicant will consult with council regarding speed limits for Keri Keri Road to be applied during construction. These will be detailed in the CTMP.	This Table. Appendix I of the Amendment Report (ERM, 2026b)
NPWS-06	Biodiversity (NPWS issue 6.3/6.4)	Consultation with NPWS during preparation of the Bird and Bat Adaptive Management Plan and the Biodiversity Management Plan. NPWS requested consideration of Yanga SCA, especially in assessing the indirect, prescribed and cumulative impacts on biodiversity, including those associated with the loss of landscape connectivity, migratory species, protection of threatened birds and bats and as a release site for the Plains-wanderer <i>Pedionomus torquatus</i>. Species, both threatened and conservation significant, are known from Yanga SCA. Those proximate to the project and Keri Keri Road were flagged by NPWS, such as the Greenhood Orchid (<i>Pterostylis pedina</i>), Plains-wanderer (<i>Pedionomus torquatus</i>), Australian Bustard (<i>Ardeotis australis</i>) and Little Eagle (<i>Hieraetus morphnoides</i>). NPWS requested a heightened recognition of Yanga SCA in the context of its migratory and wetland-dependent avian species, as 64 species, with 43 of them breeding (including colonial nesting species) across the Yanga Precinct of parks covering Waugorah Lake, Tarwillie, The Avenue, Piggery, Yanga Creek wetlands and Nimmie-Caira lignum swamps. This includes large populations of pelicans, raising the significance of NPWS's involvement in the preparation and	Noted. The Applicant will consult with NPWS when finalizing the BBAMP and BMP. The plans will, as necessary, recognize NPWS's role as the adjoining land manager and park authority for Yanga SCA and the greater Yanga Precinct.	This table.

Ref No	Theme	Submission	Response	Where Addressed
		operational delivery of the Bird and Bat Adaptive Management Plan and the project's Biodiversity Management Plan Recommend: NPWS is consulted with before finalising the Bird and Bat Adaptive Management Plan and the Biodiversity Management Plan. The plan should recognise NPWS's role as the adjoining land manager and park authority for Yanga SCA and the greater Yanga Precinct. NPWS has both a vested interest and a statutory responsibility in the protection of migratory and threatened bird and bat populations with respect to its estate and addressing direct threats associated with the project's construction and operation.		
NPWS-07	Aviation (NPWS issue 8.1)	Uncertified aerodromes (as helipads) in the parks are considered. Yanga's rotary helipad sites include (a) Bronzewing Drive 34° 26.752' S/143° 48.469' E, and (b) Yanga Homestead 34° 42.91' S/143° 36.576' E. NPWS highlights that temporary aircraft landing facilities, or emergency landing, can occur anywhere on Yanga SCA. The uncertified aerodromes (as helipads) in the Yanga Precinct of parks were not considered, nor was the agency's use of both fixed and rotary aircraft in low flight and low visibility operations. NPWS is both a public land manager and a firefighting authority that uses aircraft in a multitude of operational functions. NPWS's policy is that the agency may also respond to fires within 8 km of the boundary of land reserved or acquired under the NPW Act, at the discretion of the Area Manager, if a fire threat to the NPWS estate is detected Recommend: NPWS is consulted during all bushfire or emergency plan preparation to ensure recognition of the uncertified aerodromes (as helipads) in the Yanga Precinct and the use of temporary or emergency aircraft landing areas on Yanga SCA	Noted. The Applicant will consult with NPWS regarding all bushfire and emergency plan preparations.	This table. Appendix J of the Amendment Report (ERM, 2026b)
NPWS-08	Aviation (NPWS issue 8.5)	Safety risk assessments are revised based on the additional information affecting Yanga SCA/ NPWS operations and provide a conclusion on the WTGs and WMTs, address need for obstacle lighting in the maintenance of acceptable levels of safety for NPWS aerial operations (low flight and low visibility). Acciona Energy agreed and remains committed to maintaining the safety and performance of NPWS aerial operations. Recommend: NPWS is consulted during the preparation of any future Lighting Plan for the project. The plan is to ensure adequate aviation hazard/obstacle lighting on wind turbine generators and meteorological masts consistent with the Civil Aviation Safety Authority (CASA), and these are to be appropriately designed and operated.	Noted. The Applicant will consult with NPWS regarding preparation of any Lighting Plan for the Project. The Plan will be consistent with CASA, with appropriate design and operations.	This table. Appendix B and Appendix J of the Amendment Report (ERM, 2026b)
NPWS-09	Bushfire (NPWS issue 9.1)	Preparation of the Bushfire and Emergency Management and Operations Plan. Acciona Energy agreed and remains committed to the plan as part of the RTS. Recommend: NPWS is consulted during the preparation of the Bushfire Emergency Management and Operations Plan. The plan should consider the <i>Murrumbidgee Valley National Park Yanga Precinct Fire Management Strategy</i> (OEH, 2014), identify and mitigate ignition risks associated with the project's construction and operation and cover fire preparedness. NPWS is to be recognised as a notifiable agency where fire threatens the estate, contact via the Lower Darling Area on 03 5021 8941 or npws.lowerdarling@environment.nsw.gov.au. For emergency incidents via the NPWS Park Operations West Branch Duty Officer via Ph: 02 8275 1740.	Noted. The Applicant will consult with NPWS regarding preparation of the Bushfire Emergency Management and Operations Plan for the Project. The Applicant will consider the <i>Murrumbidgee Valley National Park (Yanga Precinct) Fire Management Strategy</i> (NSW OEH, 2015). The plan will identify and mitigate ignition risk associated with the Project's construction and operation, covering fire preparedness. The Applicant will recognize NPWS as a notifiable agency if fire threatens the estate.	This table. Appendix B of the Amendment Report (ERM, 2026b)
NPWS-10	Water and Soils	The management of dust, water and erosion issues arising from the upgrade and use of Keri Keri Road, installation of water diversion banks, and the de-	Noted.	This table.

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	(NPWS issues 11.1 to 11.3)	watering during project construction, or discharge of collected or directed run-off. Acciona Energy is committed to providing a Soil and Water Management Plan (SWMP), managing issues raised with dust, water diversion and erosion arising from the project, Recommend: NPWS is consulted during the preparation of the Soil and Water Management Plan (SWMP). The plan should ensure: - dust deposition gauge is used to monitor dust affecting Yanga SCA as per the <i>Approved Methods and Guidelines for the Modelling and Assessment of Air Pollutants in New South Wales</i> (NSW EPA, 2022), with links to the proposed Air Quality and Dust Management Plan. - hydrological assessment is conducted with modelling data for the site and the floodplain before diversion banks are utilised to modify surface water flow to/from waterways, or wetlands which feed into important riverine habitats. - dewatering and site discharge are adequately managed, so sensitive receivers, including the Yanga SCA, are not adversely affected.	The Applicant will consult with NPWS regarding the preparation of the SWMP. The plan will ensure that dust deposition gauge is used to monitor dust affecting Yanga SCA, the hydrological assessment will be conducted with modelling data from the site and the floodplain and dewatering, and site discharge will be adequately managed.	Appendix B of the Amendment Report (ERM, 2026b)
NPWS-11	Water and Soils (NPWS issues 11.4)	An erosion and sediment control plan (ESCP) is prepared for Keri Keri Road, with suitable measures applied to effectively mitigate impacts to Yanga SCA. Measures are to limit the discharge of sediment-laden runoff onto Yanga SCA, propose sediment controls (e.g., sumps and/or sediment basins) to protect water quality, and ensure any discharge is at a low, non-erosive velocity. Acciona Energy is committed to preparing and providing an ESCP for Keri Keri Road, with suitable measures to effectively mitigate impacts. NPWS raise concerns about Yanga SCA and the application of measures to limit the discharge of sediment-laden runoff and protect water quality. Recommend: NPWS is consulted during the preparation of the Erosion and Sediment Control Plan (ESCP) for Keri Keri Road. The plan is to have suitable measures to effectively mitigate impacts and limit the discharge of sediment-laden runoff onto Yanga SCA and ensure any discharge is at a low, non-erosive velocity.	Noted. The Applicant will consult with NPWS regarding the preparation of the ESCP for Keri Keri Road. Effective measures to mitigate impacts and limit the discharge of sediment-laden runoff will be implemented. The Plan will ensure that any discharge is at a low, non-erosive velocity.	This table. Appendix B of the Amendment Report (ERM, 2026b)

TABLE 1-2 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM TfNSW

Ref No	Theme	Submission	Response	Where Addressed
TfNSW-01	Traffic (generation)	1. Preconstruction Minor Works for workers accommodation camp traffic assessment requirements. A complete assessment of the wind farms and workers' accommodation camp construction pre-construction minor works is required and is to include: - Assessment of traffic volumes and identification of the types of vehicles that will be used during this period, including the largest design vehicle. - Perform a swept path analysis for the largest heavy vehicle at the existing intersection, ensuring it can navigate within the current pavement. If the design vehicle cannot turn easily, implement necessary mitigation or temporary works. - Assess existing Safe Intersection Sight Distance (SISD) and propose measures to achieve compliance, - Identify AM/PM peak hour traffic volumes and proposed volumes during this time. Traffic volumes during the AM/PM peak hours are to be comparable to those of the existing land use.	Traffic assessment of pre-construction minor works is provided in Section 1. The traffic generation during pre-construction minor works is largely consistent with the existing agricultural land use and would be within the daily variation of traffic along Sturt Highway and can therefore be suitably accommodated on the road network with no additional mitigation and management measures required. The Applicant confirms that pre-construction minor works will not include construction of the on-site workforce accommodation camp. Refer to Response 2 for further detail regarding the workforce accommodation camp.	Section 1 of the Addendum TIA, (Attachment D)

Ref No	Theme	Submission	Response	Where Addressed
		e. Identify measures to minimise project-related traffic during peak periods, like carpooling or shuttle buses. f. Outline methods to monitor and enforce traffic volumes during peak hours and other proposed mitigation measures. g. Provide a timeline and schedule for pre-construction minor works. h. Describe how to inform the community and stakeholders about increased traffic. i. Specify the hours for pre-construction minor works. j. Assess traffic associated with any temporary workforce accommodations during the pre-construction minor works period. k. Identify any necessary temporary widening or works for the design vehicle. <i>Note: No oversized overmass (OSOM) vehicles are permitted unless a swept-path analysis demonstrates compliance.</i> <i>Note: Temporary traffic controls are not allowed at intersections undergoing pre-construction minor works unless otherwise agreed with TfNSW</i>		
TfNSW-02	Workforce Accommodation	2. Workforce Accommodation Camp (previously requested 20 June 2024) a. Identify timing and sequencing of workforce accommodation camp construction. b. Provide a turn warrant assessment for the worst-case scenario of workforce accommodation camp construction and post-completion (entire operation). c. Identify traffic volumes required for pre-construction work that will occur in parallel. d. Assess operational traffic volumes for servicing accommodation camps, vehicle types, and AM/PM peak hour changes for traffic generation at each intersection with the state road network along construction transport routes.	The workforce accommodation camp would be constructed as part of construction phase site establishment activities (including the site compound and offices). The on-site camp would not be required during the pre-construction minor works phase as the small number of workers would be able to utilise local accommodation. Vehicles associated with the construction and operation of the workforce accommodation camp are expected to include heavy vehicles for the transport of modular buildings, furniture and materials, as well as regular light vehicles and smaller trucks/vans associated with ongoing operational tasks including maintenance/repairs, cleaning, catering and waste management. All traffic associated with the construction and operation of the workforce accommodation camp is included within the broader project construction traffic volumes which were assessed as part of the TIA.	Section 2 of the Amendment TIA (Attachment D)
TfNSW-03	Strategic Designs	a. Revision D Civil Design, RJ Andrews SPA - Murray Valley Hwy onto Sturt Highway - The existing fill embankment is high, with swept paths showing to track close to cadastre boundaries. Hardstand areas will need to be quantified to determine the scope and footprint of the fill required for the embankment and to confirm whether land acquisition is required. b. Revision D Civil Design, RJ Andrews SPA - Murray Valley Hwy onto Sturt Highway - There appear to be numerous underground utilities located on the south-east corner of the intersection. Further investigation required to determine the level of impact.	Revised strategic concept design for this intersection is provided in Appendix A (Sheets 01-03). The vehicle swept path and hardstand areas have been adjusted to provide additional clearance to the adjacent property boundaries for embankments/batters and drainage which would be determined during detailed design. Underground utilities would also be confirmed as part of the detailed design process. Furthermore, it is understood that EnergyCo is in the planning stages for the South-West REZ and high-level strategic designs have been prepared for this intersection to accommodate OSOM movements. TfNSW is progressing the intersection upgrade through concept and detailed design stage.	Appendix A (sheets 01-03) of the Amended TIA (Attachment D)
		c. Revision D, Civil Design, RJ Andrews SPA - Sturt Highway at Balranald - TfNSW preference is to maintain the current intersection configuration with medians and kerb and channel. Revised strategic concept designs required that references to the barrier kerb be removed and replaced with a roll-over kerb to facilitate movements onto the hardstand. d. Drainage pits will need to be assessed and made trafficable as required. To be annotated on the strategic concept designs.	Revised strategic concept design for this intersection is provided in Appendix A (Sheets 04-07). The design includes a dish crossing with trafficable grates to facilitate movements onto the hardstand area.	Appendix A (sheets 04-07) of the Amended TIA (Attachment D)
		e. Revision D, Civil Design RJ Andrews SPA - Keri Keri Northern Site Entrance - A swept path analysis has been provided. A strategic concept design of this intersection will be required prior to determination to confirm the impacts on the Sturt Highway.	An updated strategic concept design for this intersection is provided in Appendix B.	Appendix B of the Amended TIA (Attachment D)

Ref No	Theme	Submission	Response	Where Addressed
		f. Revision D, Civil Design RJ Andrews SPA - Keri Keri Road intersection - A hardstand strategic concept design will be required prior to determination to confirm the impacts on the Sturt Highway and how it will interact with Keri Keri Road. How will the hardstand be managed to reduce the likelihood that light vehicles will use the hardstand daily?	An updated strategic concept design for this intersection is provided in Appendix C. The OSOM hardstand area has been reduced significantly, and edge line marking would direct light vehicles to remain within the marked lane.	Appendix C of the Amended TIA (Attachment D)
		g. Revision D Civil Design RJ Andrews SPA - Sturt Highway at Euston - TfNSW requires a strategic concept hardstand design prior to determination, that includes the kerb replacement, existing drainage and other infrastructure checks that will impact on the scope of the road upgrades/modifications.	Strategic concept design for this intersection is provided in Appendix A (Sheets 08-10). The design includes a dished crossing with trafficable grates to facilitate movements onto the hardstand area.	Appendix A (sheets 08-10) of the Amended TIA (Attachment D)
		h. Revision D Civil Design RJ Andrews SPA - Parking Bay @86m near Balranald (Left turn into Duryea Street - The proposed parking bay is adjacent to the left turn lane into Duryea Street and private service centre. It is unsealed and poses safety concerns given the number of conflict points at this location. Is there another viable location with reduced conflict points that can be utilised/constructed?	This parking bay is no longer proposed to be utilised. An alternative location where SOM vehicles would be able to pull over if required is available in Balranald along Sturt Highway (Market Street) adjacent to Balranald Lions Park, as outlined on page 49 of the RJA report (Revision 03).	This Table.
		i. Revision D Civil Design - 21012CAD003 Figure 2 - The existing fill embankment is high, with swept paths showing to track close to the cadastre boundaries. Hardstand areas will need to be modelled as part of the strategic concept designs to be revised prior to determination, to quantify the fill embankment and confirm the exact scope of the road works, and to determine whether acquisitions are required. - There appear to be numerous underground utilities located on the southeast corner of the intersection. Further investigation required to determine the level of impact.	Revised strategic concept design for this intersection is provided in Appendix A (Sheets 01-03). The vehicle swept path and hardstand areas have been adjusted to provide additional clearance to the adjacent property boundaries for embankments/batters and drainage which would be determined during detailed design. Underground utilities would also be confirmed as part of the detailed design process. Furthermore, it is understood that EnergyCo is in the planning stages for the South-West REZ and high-level strategic designs have been prepared for this intersection to accommodate OSOM movements. TfNSW is progressing the intersection upgrade through concept and detailed design stage.	Appendix A (sheets 01-03) of the Amended TIA (Attachment D)
		j. Revision D, Civil Design, 21012CAD003 Figure 5 - TfNSW preference is to maintain the current intersection configuration with medians and kerb and channel. Please replace the barrier kerb with a roll-over kerb to facilitate movements onto the hardstand. Drainage pits will need to be assessed and made trafficable as required. - Where the raised island is proposed to be removed, TfNSW's preference is to retain this island and make parts of or the whole length trafficable.	Revised strategic concept design for this intersection is provided in Appendix A (Sheets 04-07). The design includes a dished crossing with trafficable grates to facilitate movements onto the hardstand area, as well as strengthening of the impacted traffic island.	Appendix A (sheets 04-07) of the Amended TIA (Attachment D)
		k. Revision D, Civil Design, 21012CAD003 Figure 9 - Keri Keri Road - The intersection of Sturt Highway, Keri Keri Road and Loorica Road is a four-way intersection. This arrangement is undesirable, as road users may not perceive that they are approaching an intersection and may continue through, increasing the likelihood of a side-impact crash. Austroads Guide to Road Design provides guidance on modifying four-way intersections to a staggered T intersection to mitigate this risk. Due to this development, traffic on Keri Keri Road will increase significantly, increasing the likelihood of this crash type. l. Revision D, Civil Design 21012CAD003 Figure 9 - Keri Keri Road -The intersection angle is 70 degrees, which is allowable by the standards; however, it is the absolute minimum. Is there an opportunity to better align Keri Keri Road with the Sturt Highway?	Revised strategic concept design for this intersection is provided in Appendix C. The design includes realignment of the minor road approaches to form 90-degree staggered T-intersections with BAL and CHR(s) treatments for each approach.	Appendix C of the Amended TIA (Attachment D)
		m. Revision D, Civil Design, 21012CAD003 Figure 14 - Northern Access – revise strategic concept designs to identify that the shoulder will be sealed along the length of the Sturt Highway to prevent edge breaking.	Revised strategic concept design for this intersection is provided in Appendix B. The design includes sealing of all road shoulders.	Appendix B of the Amended TIA (Attachment D)

Ref No	Theme	Submission	Response	Where Addressed
		n. Revision D, Civil Design, 21012CAD003 Figure 14 - Northern Access - All shoulders adjacent to the intersection are to be sealed.		
		o. Revision D, Civil Design, 21012CAD003 Figure 14 - Northern Access - Pavement joint appears to be located under wheel path. Please revise the box-out location.	Revised strategic concept design for this intersection is provided in Appendix B. The pavement box out location has been modified to be along the lane line.	Appendix B of the Amended TIA (Attachment D)
		p. Revision D, Civil Design 21012CAD003 Figure 17 - Austroads states that 4:1 batters are traversable but are not recoverable and are not to be included in the hazard free zone. TfNSW preference is to provide 6:1 batters that are consider both traversable and recoverable. Anything steeper than this will require safety barrier to protect the batter slope.	Revised indicative cross sections are provided in Appendix A (Sheet 03) which specify 6:1 batters.	Appendix A (sheet 03) of the Amended TIA (Attachment D)
TfNSW-04	Strategic Designs	4. Confirmation of completion of bridge assessments The revised Keri Keri Wind Farm Amended Traffic and Transport Impact Assessment, inclusive of the revised RJA Route Study (in appendix B), does not provide evidence or confirm that a bridge assessment of the TfNSW assets has been completed. The TIA is to be revised to include evidence of the bridge assessment being completed and to provide the report as an appendix to the TIA. If a bridge assessment has not commenced, then it is advised that the proponent complete the bridge assessments by contacting spu@transport.nsw.gov.au and providing the NHVR Route ID and the following information: - Overall dimensions (width, height and length) of the laden load (laden load is the vehicle combination and the load to be transported), - Total weight of the laden load, - GSM, - Payload, - deck height, - axle configuration, - axle spacing, including from the prime mover, and - axle masses (including split axle and group axle masses).	Noted. Structural assessment of the bridges and culverts along the state road network has been requested from TfNSW for the proposed OSOM routes and critical load combinations with the highest laden mass and axle loads. The response received from TfNSW (Appendix D) indicates that the Route 2A/2B vehicles (loads under 40 m overall length travelling via Mildura) comply with the Heavy Load Platform network and do not require bridge assessments. The assessment report for Route 1A/1B for the transformer vehicle travelling via Euston has not been received as of the date of this letter (ref: PT3104). However, confirmation has been received that all other OSOM vehicle combinations comply with the Heavy Load Platform network and do not require bridge assessments as they are under 16 tonnes per axle.	Appendix D (sheet 03) of the Amended TIA (Attachment D)
TfNSW-05	Traffic	5. Additional assessment requirement not previously raised- travel time delay for narrow segments of the state road network and suitability of existing pull-over locations TfNSW advises that there are narrow paved segments of the state road network below 9.6m that will be traversed by the wider loads, which will impact the ability of oncoming and following vehicles (in particular, heavy vehicles) to safely pass the proposed widest loads for the project. TfNSW recommends, prior to determination, assessing the maximum travel time delay to oncoming and following vehicles based on the average speed of following and oncoming vehicles and the average travel speed of the widest loads proposed to travel along the narrow segments of the network below a paved surface width of 9.6m. TfNSW advises that the maximum delay that would be considered acceptable would be 10-15minutes and that suitable existing pull-over bays and rest areas will need to be identified along the state road network to achieve the maximum travel delay. As part of this assessment, swept-path analysis and diagrams showing that the widest loads can access and park wholly within the pull-over lane, clear of the through lanes, will be required. TfNSW notes that known narrow segments include segments from Buronga to the Keri Keri project site on the Sturt Highway. TfNSW notes that this advice has not been provided at EIS and therefore acknowledges that this may not be addressed prior to determination. However, it is strongly advised that travel time delays are considered, given the high	Noted. An assessment of the existing sealed road widths has been undertaken based on aerial imagery along the proposed transport routes from Euston (1A and 1B) which would accommodate all OSOM loads. Assessment of the transport routes from Mildura (2A and 2B) would be undertaken post-approval and prior to OSOM transport as part of the preparation of the project TMP. It is noted that all OSOM components could be transported along routes 1A and 1B which demonstrates that there is a viable route for all OSOM loads. Alternatively, the Applicant acknowledges that further assessments and/or approvals may be required for Routes 2A and 2B which are currently proposed only for smaller loads with a total transport length of under 40 m.	Section 3 of the Amended TIA (Attachment D)

Ref No	Theme	Submission	Response	Where Addressed
		proportion of heavy vehicles using this route and known crash occurrences on this network associated with overtaking.		

TABLE 1-3 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM HERITAGE NSW

Ref No.	Theme	Submission	Response	Where Addressed
HNSW-01	Aboriginal consultation	Heritage NSW requires that consultation with Registered Aboriginal Parties (RAPs) is continuous and under our guidelines, breaks in consultation of over six months may not constitute continuous consultation. We note that a gap of over 6 months has occurred during consultation. If an unexpected break of greater than six months has occurred, the applicant may be required to restart the consultation process. Please ensure that consultation is kept continuous, and all consultation included in the submitted ACHAR.	The Applicant understands that the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW, 2010) state that consultation with Aboriginal people should be sustained throughout the heritage assessment process. The Project Aboriginal Cultural Heritage Assessment Report (ACHAR) (April 2024) and Amended ACHAR (January 2026) detail the consultation undertaken; however, for reasons beyond the control of the Applicant, consultation during 2025 was less frequent. The lapse in consultation occurred while the Applicant was in the process of applying for access rights to the South West Renewable Energy Zone transmission infrastructure. The applicant was not successful with this application and, therefore, spent some months realigning the strategic direction of the project. The RAPs were notified of the unsuccessful application, and it was hence deemed unnecessary to engage with them until the applicant had resolved this strategic realignment. The Applicant engaged with Heritage NSW on 23 February 2026 to discuss this matter. Heritage NSW advised that they did not require the consultation process to begin again; however, they did require evidence of more frequent engagement moving forward. Consultation with the Local Aboriginal Land Council and other Registered Aboriginal Parties (RAPs) has occurred since this meeting, including the involvement of RAPs in additional field surveys. Consultation will be ongoing through determination, pre-construction, construction and operation of the Project. An updated record of engagement with Aboriginal communities has been provided.	This table.
HNSW-02	Aboriginal consultation	In accordance with the Aboriginal Consultation Guidelines for Proponents 2010 (Consultation Guidelines), please provide all consultation records (including all letters and email correspondence) undertaken for the project. Specifically, please provide copies of dated email records with all relevant email addresses shown and/or delivery / read receipts of the correspondence to ensure all RAPs have been adequately consulted. Example letters are not sufficient to meet this requirement. This request is especially pertinent owing to the number of highly significant Aboriginal cultural heritage sites within the vicinity project area.	Noted. An updated record of engagement with Aboriginal communities has been provided.	Appendix D – Appendix U of the ACHAR V3 (Attachment E)
HNSW-03	Transport route Aboriginal cultural heritage assessment	In support of the EIS, a due diligence assessment (Appendix P) was supplied for additional assessment of the project transport route. Heritage NSW does not review due diligence assessments as they are a legal defence against harm under section 87 of the <i>National Parks and Wildlife Act 1974</i> (NPW Act). As the regulator under the NPW Act, Heritage NSW can be called upon on to participate in non-compliance investigations under the Act, including strict liability offences for which due diligence is used as a defence. Heritage NSW recommends that Appendix P is made an Addendum to the ACHAR for review and comment.	Noted. The assessment of Aboriginal Cultural Heritage at relevant upgrades along the transport route has updated accordingly. Please note that additional field survey was undertaken at relevant upgrade locations to inform the updated assessment.	Appendix W of the ACHAR V3 (Attachment E)
HNSW-04	Survey coverage	Heritage NSW requires that for this project all assessment should be undertaken prior to the determination of impacts to Aboriginal cultural heritage. Without adequate and complete assessment, in this case thorough survey of the project area to establish cultural significance, it cannot be demonstrated that more places of significance, or places which may further enhance the significance of the known Aboriginal cultural heritage in the area will not be found.	The Applicant engaged with Heritage NSW on 23 February 2026, to discuss the request for additional information and the proposed approach to meet Heritage NSW requirements. This included discussing options to achieve appropriate survey coverage. Heritage NSW agreed on the approach outlined by the Applicant for additional survey to achieve:	Section 8.4 of the ACHAR V3 (Attachment E)

Ref No.	Theme	Submission	Response	Where Addressed
		Heritage NSW note the proposed methodology committed to 100% survey coverage of the micro-siting corridor in areas of high archaeological potential, and 50% survey coverage of the micro-siting corridor in areas of moderate and low archaeological potential. The survey data presented in Table 8.3 indicates that these commitments were not met. Further, Figure 8.1 of the revised ACHAR indicates that large portions of the proposed micro-siting corridor were not surveyed. Given that Aboriginal Ancestral Remains (AAR) sites and other archaeological features were identified across all areas subject to survey, Heritage NSW considers that the lack of sufficient survey covering across the project area has led to misleading data. Specifically, as indicated in Figure 9.4, the gaps in survey coverage directly correlate to gaps in recorded AAR. We note that additional information regarding the cultural and archaeological sensitivity of the project area has been identified since ERMs presentation of preliminary survey results to Heritage NSW in July 2022 (DOC22/550882 2), with an additional 25+ AAR identified since this time. As such, and in consideration of the significant cultural landscape and demonstrated archaeological sensitivity of the project area, Heritage NSW consider that sample survey of landforms is not appropriate in this case. Accordingly, supplementary survey of the micro-siting corridor is required in areas not yet subject to archaeological survey. Heritage NSW note that given the erosive nature of the landform and the time elapsed resurvey of the entire micro since original survey efforts, siting corridor may also be appropriate. At a minimum, the commitments in the project methodology must be met, but Heritage NSW recommends that the Department require a thorough and complete survey of the project area owing to the significant cultural landscape the project area is situated in.	50% coverage of low sensitivity areas within the disturbance footprint and micro-siting corridor; >80% coverage of moderate sensitivity areas within the disturbance footprint and micro-siting corridor; and 100% survey coverage of high/very high sensitivity areas within the disturbance footprint and micro-siting corridor. Additional surveys were undertaken in late-April, early-May 2026 and subsequent data analysis determined that survey coverage for the Project has now achieved: 100% of Very High/High archaeological potential landscapes; 81.5% of Moderate archaeological potential landscapes; and 56.9% of Low archaeological potential landscapes. ACHAR V3 includes additional information and figures to demonstrate adequate survey coverage.	
HNSW-05	Survey coverage and track data	As per Requirement 5 of the Code of Practice, all archaeological survey must be recorded and mapped, including recording the beginning, length and end points of transects using a hand GPS receiver recording the area traversed. We note that Figure 8.1 of the updated ACHAR provides Survey Units only and not recorded track logs. Please update the mapping to include track logs.	Section 8 of the ACHAR V3 has been updated to show all survey track logs, including Figures representing survey track logs per Survey Unit. Spatial data of survey tracks/effort has also been provided.	Section 8, Figure 8-1 to Figure 8-10 of the ACHAR V3 (Attachment E)
HNSW-06	Archaeological sensitivity	We note that at least seven AAR (some including Potential Archaeological Deposit [PAD]), as well as other archaeological features including earth mounds, are mapped in areas of identified low and moderate archaeological sensitivity (Figure 13.1). The assessment of archaeological sensitivity must be updated to reflect the presence of archaeological features that were ground truthed during survey and should not be based solely on desktop predictive modelling. Heritage NSW considers that the current archaeological sensitivity mapping is not sufficiently justified in the ACHAR.	Where relevant, the assessment of archaeological sensitivity has been updated to reflect the presence of archaeological features that were recorded during surveys.	Section 13.2 of the ACHAR V3 (Attachment E)
HNSW-07	Aboriginal heritage extent	Please provide a definition of an 'Aboriginal Heritage Extent' and a justification as to how these boundaries have been established and characterised.	Aboriginal Heritage Extent has been defined and the method to establishing and characterising these boundaries has been provided.	Section 9.3.1.1 of the ACHAR V3 (Attachment E)
HNSW-08	Test excavation	As indicated in Figure 9.2a to Figure 9.2l, many recorded sites (including AAR and PAD) are situated within direct vicinity of the micro-siting corridor. Test excavations to determine the nature of subsurface archaeological materials and the potential extent of PADs is required to provide greater certainty on the areas that should be conserved and those locations that require additional management and mitigation prior to any approval for their impact. Heritage NSW note that one RAP (Verna Pappin, representing the Pappin Family Aboriginal Corporation) indicated their preference for delayed test excavation, following project approval.	A commitment to undertake a post-determination program of geophysical survey (ground penetrating radar), test excavation and, if required, Project redesign has been included in the ACHAR V3. A Draft Excavation Method including geophysical survey and test excavation has been provided.	Section 9 and Appendix X of the ACHAR V3 (Attachment E)

Ref No.	Theme	Submission	Response	Where Addressed
		In consideration of this, Heritage NSW recommend that the EIS and ACHAR should include a commitment to a post-determination program of geophysical survey, test excavation and if required, project redesign should significant archaeological objects/site be identified. An excavation methodology should be developed to guide the works in consultation with RAPs and Heritage NSW, and in accordance with Heritage NSW guidelines and codes of practice. The methodology should include mapping of proposed testing areas. The methodology should be submitted as part of the RtS package and included in an Aboriginal Cultural Heritage Management Plan (ACHMP) post-determination.		
HNSW-09	Earth mound ground truthing	Please confirm how many potential earth mounds were identified within the micro-sitting corridor via aerial imagery, and the results of ground truthing these locations.	Surveys undertaken to inform the ACHAR recorded 71 sites that can be classified as residential places/earth mounds. One of these sites has the potential to be directly impacted. Two of these sites are within the micro-siting corridor and may be subject to impact; however, the Applicant will look to avoid these sites by maintaining infrastructure within the current alignment (i.e., not micro-siting).	Section 9.3 of the ACHAR V3 (Attachment E)
HNSW-10	Forensic Anthropologist Report	The Forensic Anthropologist Report (Appendix U of the revised ACHAR) is a preliminary summary only and provides insufficient assessment of the AAR within the project area. As such, please update the Forensic Anthropologist Report to include: a. The methodology that was implemented for the assessment and analysis. b. A detailed summary of each AAR including: i. Site condition ii. Presence/absence of PAD iii. Analysis of remains including estimated number of individuals, estimated antiquity, any identifying features etc. iv. Detailed recording including photogrammetry, photographs and plans	The Forensic Anthropology Report has been updated to include the detail requested plus additional assessment undertaken during the April 2026 survey event.	Section 9.3.2 and Appendix V of the ACHAR V3 (Attachment E)
HNSW-11	Forensic anthropology assessment	Please clarify if the Forensic Anthropologist assessed the four potential AAR sites (KK198, KK210 and KK-195, KK-215). Further discussion should be provided about the potential AAR sites.	The four potential AAR sites (KK-198, KK-210, KK-195 and KK-215) were identified after the site inspection undertaken by the forensic anthropologist. This was stated in the ACHAR. The forensic anthropologist visited the Project site in April 2026 to assess these four sites. This detail is provided in the updated Forensic Anthropology Report	Section 9.3.2 and Appendix V of the ACHAR V3 (Attachment E)
HNSW-12	Geophysical survey	Ground Penetrating Radar (GPR) survey of the AAR sites should be undertaken to determine potential site extents, especially for AAR sites in the vicinity of the proposed works.	See response to HNSW-08	Appendix X of the ACHAR V3 (Attachment E)
HNSW-13	Average density of AAR	Following completion of supplementary survey, the consultant should calculate the average density of AAR across the project area and examine the results to identify any distribution patterns.	Average density of AAR across a portion of the surveyed Project area has been included in the ACHAR V3.	Section 9.3.2 of the ACHAR V3 (Attachment E)
HNSW-14	Conservation/management of exposed AAR	Please include an indicative methodology for proposed conservation and management of any exposed AAR within the project area.	An indicative methodology for the conservation and management of AAR has been developed in collaboration with the forensic anthropologist. This will be further refined during the development of the Aboriginal Cultural Heritage Management Plan (ACHMP).	Section 13.2.2 of the ACHAR V3 (Attachment E)
HNSW-15	Targeted Aboriginal community consultation	Heritage NSW recommends that, given the project area's demonstrated archaeological sensitivity, complexity and cultural significance, additional targeted Aboriginal community consultation and cultural investigations must be undertaken through preparation of a Cultural Values Assessment. This will ensure a more comprehensive understanding of the cultural values associated	The Applicant met with Heritage NSW on 23 February 2026 and discussed the need for a Cultural Values Assessment. It was agreed that a standalone Cultural Values Assessment was not required, rather the ACHAR V3 has been updated to strengthen the relevant assessment.	Section 11.2.1 of the ACHAR V3 (Attachment E)

Ref No.	Theme	Submission	Response	Where Addressed
		with the area and will inform an appropriate impact assessment and proposed mitigation.		
HNSW-16	Comparative analysis	A comparative analysis should be prepared that considers the density, distribution and assessed significance of the AAR sites and overall cultural landscape within the project area, against the regional context of other known ancestral burial grounds such as at Jeraly North, Toogimbie and Tchelery.	A regional comparison of burial sites across the Mallee Plains is constrained by inconsistent terminology and site-specific reporting; however, studies by Littleton (1999, 2002) identify a recurring pattern of scattered and clustered burials within distinct landforms rather than formal “cemeteries” as defined by Pardoe. Well-documented locations such as Jeraly North, Toogimbie and Tchelery are characterised by high-density, spatially coherent burial activity within palaeochannels, lunettes and sandy rises, reflecting repeated mortuary use within a consistent geomorphic context. In contrast, the Project Area contains more dispersed Aboriginal ancestral remains and related features that form part of a broader occupation landscape rather than a concentrated burial node. As such, it does not meet the criteria for a cemetery or burial ground and is more appropriately interpreted as a burial-bearing cultural landscape. The comparative analysis in the ACHAR has been updated and expanded.	Section 9.3.2.1 of the ACHAR V3 (Attachment E)
HNSW-17	Burials	Please provide a discussion regarding the potential of the project area to be defined as a ‘burial ground’, as per Jeraly North, Toogimbie, Tchelery and other similar sites.	See response to HNSW-16. The Project Area is best described as a burial-bearing cultural landscape, rather than a distinct burial ground or collection of burial nodes.	Section 9.3.2.1 of the ACHAR V3 (Attachment E)
HNSW-18	Significance assessment	Section 11 (Significance Assessment) must be updated to assess the significance of the cultural landscape of the project area as a whole, as informed by a Cultural Values Assessment and comparative analysis.	The Significance Assessment has been updated to reflect the outcome of the Cultural Values Assessment, comparative analysis and field surveys.	Section 11 of the ACHAR V3 (Attachment E)
HNSW-19	Cultural significance	Heritage NSW observes that Section 11.2.3.6 incorrectly states that no specific areas of social or cultural significance have been identified within the project area. Given the substantial Aboriginal cultural heritage present - particularly AAR - this statement should be revised to reflect this, as well as the broader cultural landscape and the area’s established archaeological sensitivity.	The ACHAR discussed that the RAPs and Aboriginal community did not identify any portion of the Project area that has greater significance than another area. The locations of the cultural material were all identified as having high significance, as was the whole landscape. This has been clarified in the ACHAR V3.	Section 11 of the ACHAR V3 (Attachment E)
HNSW-20	Recorded sites	Please update Table 12.1 to include all sites within the project area.	Noted. Table 12-1 has been updated as requested.	Section 12.1 and Table 12-1 of the ACHAR V3 (Attachment E)
HNSW-21	Impact assessment	Section 12 (Impact Assessment) should be revised to evaluate how the proposed works may affect the cultural values and significance of the broader cultural landscape in which the project is located. Although no direct impacts have been identified, the assessment should also consider and address any indirect impacts that may result from the construction and operation of major infrastructure within this culturally significant landscape. Heritage NSW considers that the potential impacts of the proposed works on the cultural significance of the project area and the wider cultural landscape has not been sufficiently assessed or justified to date.	Both direct and indirect impacts associated with the Project have been reassessed and, as necessary, updated in the ACHAR V3. This was informed by the additional survey work, the forensic anthropologist assessment, cultural values assessment, comparative analysis and updated significance assessment	Section 12 of the ACHAR V3 (Attachment E)

TABLE 1-4 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM THE NSW DCCEW WATER GROUP

Ref No.	Theme	Submission	Response	Where Addressed
WG-01	Water Supply/ Demand	1.1 Recommendation – pre-determination The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to clarify the ability to obtain a secure water supply for the project. This is to include confirmation of consultation with third parties where required and to demonstrate sufficient entitlements can be acquired where necessary	The Applicant has discussed construction water supply with Balranald Shire Council (BSC). BSC have confirmed they can provide the 31 ML/year potable water demand and 66 ML/year non-potable water demand for the Project. The 66 ML/year of non-potable water, equating to ~99 ML over the 18-month construction period will be used for dust suppression, concrete batching, equipment washing and erosion control etc.	This table.

Ref No.	Theme	Submission	Response	Where Addressed
		Explanation Insufficient information is provided to demonstrate a secure water supply is available for the project. The proponent has stated they will develop a Water Sourcing Plan post determination, and while the development of this plan is supported, the proponent must still demonstrate the project is able to meet its water demands prior to determination. It is also noted Water Access Licence 41961 proposed to meet part of the construction demands is a special purpose access licence for stock watering and cannot be used for the project. Where water will be obtained from a third party such as Council or other water supplier, the proponent must confirm there has been consultation with the third party and that they have indicated there is availability for the project. As this project is located within the South-West Renewable Energy Zone, there will likely be high demand on these water sources.	If, for whatever reason, BSC cannot provide the full 66 ML/year non-potable construction water, the Applicant will be able to secure the shortfall through a diversified, market-based sourcing strategy consistent with the NSW water regulatory framework. Supply will be drawn from a combination of: - WAL-based sourcing (lease or purchase) via licensed third-party providers (e.g., water brokers or entitlement holders), in accordance with the <i>Water Management Act 2000</i> (WM Act) and relevant Water Sharing Plan (WSP) dealing rules; - Temporary allocation assignments, enabling annual allocations to be traded independently of entitlement to meet peak demand requirements; - Licensed third-party supply, where water is procured from operators holding valid WALs and extracting within allocation and system limits; - Carryover utilisation, where available under licence conditions within the Lower Murrumbidgee system; and - Multiple physical sources, including regulated surface water, groundwater (subject to approval), and existing licensed storages (e.g., farm dams). This multi-source approach avoids reliance on any single supply pathway, enabling water procurement to be optimised against market availability, seasonal conditions and regulatory constraints. All water will be obtained in accordance with the Water Management Act 2000 (NSW) and applicable WSPs. The project will utilise established and compliant market mechanisms, including: - WAL leasing (preferred) for the construction duration; - WAL purchase, where leasing is constrained or commercially inefficient; - Temporary allocation trades to supplement supply during peak construction periods; and/or - NSW's water market framework—where entitlements are separable from land and fully tradeable—provides a robust and flexible mechanism to secure supply within sustainable system limits. Depending on the final sourcing mix, the following approvals will be obtained: - WAL dealings (transfer or lease) approved by DCCEEW / WaterNSW; - Water supply work approvals for any extraction infrastructure (e.g. bores, pumps, pipelines); or - Water use approvals, where required for application to land. All water take will be: - Metered and reported in accordance with the NSW Non-Urban Water Metering Framework; and - Managed in compliance with project consent conditions and WSP requirements. Where direct extraction is proposed (surface water or groundwater), the project will undertake targeted hydrological and hydrogeological assessments to demonstrate that water take: - Remains within WSP extraction limits and licence conditions; - Does not cause adverse impacts to aquifers, connected surface waters, dependent ecosystems, or third-party users; and - Monitoring, reporting and adaptive management measures will be implemented where required to maintain compliance throughout construction. The proposed approach is fully aligned with NSW Water Group expectations, including: - Use of licensed, metered and auditable water sources;	

Ref No.	Theme	Submission	Response	Where Addressed
			- Procurement through the established NSW water market framework; - Avoidance of unlicensed or unregulated take; and - Demonstrated consistency with Basin Plan and WSP allocation and trading rules. This ensures that water is sourced within sustainable diversion limits and basin-wide allocation settings. The project's construction water demand (~99 ML total; ~66 ML/year) is negligible relative to the scale of water availability and trading activity within the Lower Murrumbidgee / broader Murrumbidgee regulated system, where water resources, allocations and trades are typically measured in hundreds of gegalitres (GL). Water allocation statements for the Murrumbidgee regulated river system indicate general security account balances on the order of hundreds of gegalitres, for example approximately 310 GL of general security water was available in 2025–26. This demonstrates that the project's annual demand (~0.066 GL) represents less than 0.05% of available allocations, confirming it is immaterial in system-scale terms. Total active storage in Blowering and Burrinjuck dams is typically in the order of 2,000 GL combined, supporting large-scale regulated supply across the valley. This provides strong assurance of physical water availability underpinning allocations and trade. Recent allocation determinations show: - High security allocations ~95%; and - General security allocations supplemented by carryover (~16–30% of entitlement depending on year) demonstrating that water is routinely available across licence categories, with carryover provisions enhancing reliability between years. Across the southern Murray–Darling Basin (including the Murrumbidgee), annual entitlement trade volumes are on the order of ~198 GL per year, with substantial allocation trading activity occurring in parallel. In addition, inter-valley trade limits in the Murrumbidgee system alone allow up to ~100 GL of trade movement, with tens of GL actively traded at any given time. This confirms that the market depth significantly exceeds the project's modest demand. Water allocation statements note tens of thousands of megalitres (e.g., ~50,000 ML) of supplementary/uncontrolled flow use in some years, providing additional opportunistic supply pathways. Based on the above, the project's total construction water requirement (~0.1 GL) is orders of magnitude smaller than both the available resource pool and typical annual trading volumes in the Lower Murrumbidgee system. The established water market, combined with demonstrated allocation availability, carryover provisions and multiple sourcing pathways, provides a high level of confidence that sufficient licensed water entitlements can be secured without supply constraint or adverse system impact.	
WG-02	Water Access Agreement	1.2 Recommendation– pre-determination DPHI should request the proponent to identify and provide an impact assessment of any new water supply works proposed, or where the existing bore /s proposed to be used is stock and domestic as further assessment is required to convert this to a production bore. Explanation	The Applicant does not intend to use existing stock and domestic bore/s to meet non-potable construction water demand. As above, the Applicant has confirmed that BSC can supply the Project's potable and non-potable water demand. Regardless, should water supply works be necessary, the Applicant will undertake the necessary assessments and seek the appropriate licences.	This table.

Ref No.	Theme	Submission	Response	Where Addressed
		The proponent stated at EIS stage that the preferred water supply method for the project is to use existing groundwater bores and install additional bores as required. The latest information has also indicated the potential to access water from groundwater bores. However, to date there has been no assessment of new bores or identification of existing bores to be used. It is noted that the existing stock and domestic bores nearby are unable to be used without an impact assessment to change them to production bores. The proponent must identify new or existing water supply works to be used, and if new or a current stock and domestic bore, an impact assessment is required. Without this the proponent will be unable to meet section 4.41 of the <i>EP&A Act 1979</i> so would require secondary approval under the <i>Water Management Act 2000</i>. The outcome of such approval processes cannot be guaranteed and so cannot be relied upon as a viable water supply option at this stage.		
WG-03	Water Licensing	1.3 Recommendation – post -determination DPHI should request the proponent to ensure: • Sufficient water entitlement is held in a water access licence/s to account for the maximum predicted take for each water source prior to take occurring unless an exemption applies. • The Water Access Licences proposed to account for water take by the project has nominated an extraction point and this dealing is to be completed prior to water take occurring. Explanation The proponent has indicated groundwater is an option to source water to meet non -potable water demands. The WAL referenced (WAL 41961) is unable to be used for the project as it is a specific purpose licence which has a condition restricting its use to stock watering. While this WAL is unable to be used, the NSW Water Register indicates an active trading history in the Lower Murrumbidgee Deep Groundwater Source which suggests trading is an option. It will be the proponent's responsibility to identify willing sellers and obtain sufficient entitlement to account for take prior to construction commencing. It is also noted that under the <i>Water Management Act 2000</i> a WAL must nominate the extraction point where water will be taken. This must occur prior to take occurring.	Noted. The Applicant acknowledges DCCEEW Water's recommendation regarding water access licensing and confirms commitment to complying with the requirements of the <i>Water Management Act 2000</i>. The Applicant acknowledges that the water access licence previously referenced (WAL 41961) is a specific purpose licence restricted to stock watering and cannot be used for the Project; alternative licence(s) will be sought prior to construction.	This table.

TABLE 1-5 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM EDWARD RIVER COUNCIL

Ref No.	Theme	Submission	Response	Where Addressed
ERC-01		Thank you for providing Edward River Council with the opportunity to review the Proponents Response to Submissions in relation to the proposed Keri Keri Wind Farm Project located within the Murray River Local Government Area and situated close to the Edward River Local Government Area boundary. Council has reviewed the Response to Submissions and has no specific comments. Please refer to the attached Edward River Council Renewable Energy Position Statements designed to support and inform the Conditions of Consent mandated by the Department of Planning, Housing and Infrastructure (DPHI), and for use in discussions and negotiations between Council, government agencies and project proponents. The Proponent shall be responsible for all costs associated with requirements and expectations of the Proponent in these Position Statements, with no financial burden placed on Council, community or landholders.	Noted. The Applicant acknowledges the Edward River Council (ERC) Renewable Energy Position Statements and confirms that all costs associated with meeting the requirements and expectations therein will be borne by the Applicant, with no financial burden placed on ERC, the community or landholders.	This table.

TABLE 1-6 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FROM HAY SHIRE COUNCIL

Ref. No.	Theme	Submission	Response	Where Addressed
HSC-01	Traffic and Transport	Council provides the following comments on Appendix I [the Amended Traffic Impact Assessment]: • Council considers that cumulative impacts should be reassessed in light of: ◦ The likely preferred transport route from the Port of Adelaide; and ◦ The timing overlap of multiple regional projects • Council believes the shared transport corridor along the Sturt Highway will experience significant impacts, including on business-as-usual traffic. While Council notes the applicant's commitment to consultation with other proponents, this alone is insufficient mitigation. • Council considers the assessment of only three wind farms to be inadequate. The Sturt Highway is likely to experience significant increases in OSOM and associated traffic due to the cumulative impacts of all concurrent developments in the region. • While the existing road network may have capacity to support the project in isolation, Council remains concerned about the cumulative impact of all proposed developments on the transport network.	Noted. The EIS for the Project considered the cumulative impacts of 19 relevant developments including projects undergoing assessment, under construction and operational. These projects were located between 0 and 150 km from the Project and included wind energy, solar energy, and transmission projects. Between exhibition of the Project EIS and the preparation of the Response to Submissions Report (RtS) and Amendment Report, the status of some assessed projects was updated, new projects were added, and some projects were withdrawn. Section 6.6 of the Amendment Report provided an updated cumulative impact assessment, including the assessment of an additional 11 projects. Cumulative impacts associated with OSOM vehicle movements along the transport route from the Port of Adelaide (NSW border) were assessed in Section 5 of both the Traffic and Transport Impact Assessment and the Amended Traffic Impact Assessment. The assessment considered the timing of nearby projects and was undertaken in accordance with relevant guidelines. Four nearby wind farms (Tchelery, Baldon, Wilan and Junction Rivers) and Project EnergyConnect were considered. The Applicant has since assessed all projects in the SW REZ and considers that only the construction of projects that are past the 'Prepare EIS' stage (i.e., 'Response to Submissions', 'Assessment', 'Determination' or 'Approved') may coincide with that of the Project (i.e., 2027-2029). These include: • Tchelery Wind Farm (~1,150 OSOM movements); • Baldon Wind Farm (~2,375 OSOM movements); • Junction Rivers Wind Farm (~1,378 OSOM movements); • The Plains Wind Farm (~3,105 OSOM movements); • Pottinger Wind Farm (~3,458 OSOM movements); • Bullawah Wind Farm (~2,000 OSOM movements); • Yanco Delta Wind Farm (~3,990 OSOM movements); • Dinawan Wind Farm (~2,884 OSOM movements); • Mallee Wind Farm (~1,140 OSOM movements); • Balranald Mineral Sands Project; and • Romani battery energy storage system. It is assumed that the transport routes proposed by each project will include sections of the Sturt Highway. While the construction of these projects will not overlap entirely, it is likely that the construction phases will overlap in part and, therefore, cumulative impacts from OSOM movements are expected. Peak cumulative effects are expected to occur when multiple projects undertake OSOM deliveries concurrently, particularly during foundation, turbine, modular plant or major component installation stages. Notably, the transport of components for the wind farms will create the most OSOM movements - collectively potentially over 20,000 OSOM movements. Given the linear nature of OSOM impacts, the cumulative assessment focused on the shared renewable energy OSOM transport network, including: • State and regional roads managed by Transport for NSW (TfNSW); • Local roads managed by relevant councils where OSOM access is required; and • Key intersections, bridges, tight radii and constrained sections identified as OSOM pinch points.	This Table. Section 5.6 of Appendix J of the EIS (ERM, 2024) Section 5.2, Section 6.2 of Appendix I of the Amendment Report (ERM, 2026b)

Ref. No.	Theme	Submission	Response	Where Addressed
			The spatial scope reflects the fact that cumulative impacts arise along transport corridors, rather than at the project site alone. Without coordinated management, cumulative OSOM movements have the potential to result in: • Traffic and operational impacts, including congestion, queuing and delays on key corridors and at constrained intersections; • Road safety risks, particularly where multiple escort convoys reduce network flexibility or increase driver distraction; • Accelerated road and bridge wear, including pavement fatigue and structural loading effects; • Amenity impacts for local communities, including noise, vibration, temporary access restrictions and perceptions of industrialisation; and • Reduced network resilience, where incidents on OSOM routes have more widespread consequences due to high combined usage. These effects may arise from the aggregation of OSOM movements over time and across shared infrastructure. Cumulative OSOM impacts are best managed through strategic, coordinated and adaptive controls; however, project-by-project measures are also important. The following management framework may be considered: • Centralised OSOM scheduling and coordination: ◦ Development and implementation of a project-specific OSOM Transport Management Plan (TMP) that aligns with TfNSW and the National Heavy Vehicle Register (NVHR) permitting requirements; ◦ Regional OSOM coordination (where available), led by TfNSW or developers; ◦ Advance scheduling of OSOM movements to: ◦ Avoid concurrent convoys on constrained routes; ◦ Minimise peak-hour, school-hour and event-related conflicts; ◦ Allow TfNSW and councils to sequence permits across multiple projects; • Staggering and temporal separation: ◦ Staggering of OSOM deliveries where practicable, particularly during periods of high cumulative demand; ◦ Adaptive scheduling, enabling OSOM movements to be deferred if network constraints, incidents or competing project movements arise; • Route standardisation and infrastructure protection: ◦ Use of approved and standardised OSOM routes to limit the spatial extent of cumulative impacts; ◦ Pre- and post-movement road condition surveys coordinated with TfNSW and councils to: ◦ Identify cumulative wear; ◦ Ensure equitable responsibility for repairs; ◦ Developer contributions to road upgrades or strengthening where cumulative loading thresholds are approached; • Traffic safety and community amenity measures: ◦ Consistent application of escort arrangements, traffic controllers and temporary traffic controls across projects; ◦ Clear community notification protocols coordinated, where possible, with other developers to: ◦ Avoid notification fatigue; ◦ Provide certainty to residents and road users; ◦ Restrictions on night-time or weekend OSOM movements where multiple projects could otherwise generate unacceptable cumulative amenity impacts; • Monitoring and adaptive management:	

Ref. No.	Theme	Submission	Response	Where Addressed																																			
			◦ Ongoing liaison with TfNSW, councils and other developers during construction; ◦ Review of OSOM impacts at key project milestones, with the ability to: ◦ Modify routes; ◦ Adjust scheduling; and ◦ Increase mitigation where cumulative impacts are greater than predicted. It is also assumed that, to minimise impacts to other road users, adequate passing bays have been proposed along the respective routes. All OSOM movements will require a permit from the NHVR and, therefore, restrictions and management measures will likely be implemented to ensure that movements are coordinated and result in minimal disruption. This will minimise impacts on the operation of the road links that are part of the identified transport routes. The table below summarises the cumulative OSOM Risks and potential controls. <table><tr><th>Cumulative Risk</th><th>Impact Pathway</th><th>Potential Cumulative Effect</th><th>Primary Management / Control Measures</th><th>Residual Risk</th></tr><tr><td>Overlapping turbine and transformer deliveries</td><td>Concurrent OSOM campaigns across multiple projects</td><td>Congestion, delays, limited network flexibility</td><td>Regional OSOM coordination; staged delivery campaigns; TfNSW permit sequencing</td><td>Low</td></tr><tr><td>Repeated heavy axle loads on shared routes</td><td>Aggregate OSOM movements over time</td><td>Accelerated pavement and bridge wear</td><td>Approved route standardisation; pre/post condition surveys; targeted upgrades</td><td>Low–Moderate</td></tr><tr><td>Increased escort vehicles and traffic control</td><td>Multiple convoys on same corridors</td><td>Road safety risk and driver confusion</td><td>Consistent escort standards; traffic management planning; staggered movements</td><td>Low</td></tr><tr><td>Community amenity impacts</td><td>Noise, vibration and access constraints</td><td>Perceived industrialisation of rural roads</td><td>Coordinated community notifications; timing restrictions; route optimisation</td><td>Low</td></tr><tr><td>Bottlenecks at constrained locations</td><td>Bridges, town centres, tight curves</td><td>Queuing, temporary access disruptions</td><td>TfNSW approvals; temporary works; convoy spacing controls</td><td>Low</td></tr><tr><td>Incident response capacity</td><td>Reduced redundancy due to OSOM density</td><td>Broader network disruption if incident occurs</td><td>Adaptive scheduling; incident contingency planning; real-time liaison</td><td>Low</td></tr></table>	Cumulative Risk	Impact Pathway	Potential Cumulative Effect	Primary Management / Control Measures	Residual Risk	Overlapping turbine and transformer deliveries	Concurrent OSOM campaigns across multiple projects	Congestion, delays, limited network flexibility	Regional OSOM coordination; staged delivery campaigns; TfNSW permit sequencing	Low	Repeated heavy axle loads on shared routes	Aggregate OSOM movements over time	Accelerated pavement and bridge wear	Approved route standardisation; pre/post condition surveys; targeted upgrades	Low–Moderate	Increased escort vehicles and traffic control	Multiple convoys on same corridors	Road safety risk and driver confusion	Consistent escort standards; traffic management planning; staggered movements	Low	Community amenity impacts	Noise, vibration and access constraints	Perceived industrialisation of rural roads	Coordinated community notifications; timing restrictions; route optimisation	Low	Bottlenecks at constrained locations	Bridges, town centres, tight curves	Queuing, temporary access disruptions	TfNSW approvals; temporary works; convoy spacing controls	Low	Incident response capacity	Reduced redundancy due to OSOM density	Broader network disruption if incident occurs	Adaptive scheduling; incident contingency planning; real-time liaison	Low	
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Ref. No.	Theme	Submission	Response	Where Addressed
			Aside from OSOM movements, these projects may also lead to cumulative impacts from other construction traffic on the Sturt Highway and surrounding road network. This includes material/equipment deliveries, and staff/contractor movements (although it is assumed that all projects will have a temporary workforce accommodation camp). These movements will be managed by the individual projects Traffic Management Plan (or similar); however, a coordinated approach may also be warranted to minimise impacts. The Project and anticipated or reasonably foreseeable future projects are proposed within a Renewable Energy Zone, the intent of which was to concentrate renewable energy developments. The Applicant is committed to implementing a range of mitigation and management measures to ameliorate cumulative traffic and transport impacts, as detailed in Section 6 of the Amended Traffic and Transport Impact Assessment.	
HSC-02	Social and Economic	Council provides the following comments on Appendix N [the Updated Economic Assessment]: - While the report acknowledges likely labour shortages and cost pressures, as well as impacts on material supply (including concrete and gravel), Council considers that these impacts are not adequately addressed or mitigated at a local or regional level. - Council believes the assessment overstates labour supply benefits. Local and regional labour supply is unlikely to meet demand as suggested. Council again supports Murray River Council's request for a Workforce Development Strategy, prepared in consultation with affected councils, and this being included as a Condition of Consent. - Council considers that accommodation impacts require further assessment and the development of a Workforce Accommodation Plan in consultation with councils and this also being included as a Condition of Consent - Council reiterates concerns regarding cumulative impacts on material supply chains, particularly concrete and gravel, which are already subject to limited regional capacity. - Council does not agree with statements attributing housing shortages to councils. Council considers this assertion inappropriate and not reflective of the broader structural and market drivers affecting housing availability.	Noted. The Applicant has reviewed Council's comments in the context of the Updated Economic Assessment (Appendix N) and provides the following response, including identification of areas where further detail or commitments are warranted. 1. Labour shortages and cost pressures The Updated Economic Assessment appropriately recognises the potential for labour shortages, wage escalation, and input constraints (including quarry materials and concrete), particularly in a cumulative development context. However, these risks are primarily addressed at a high level and largely rely on market adjustment mechanisms (e.g. labour inflow, price signals) rather than project-specific mitigation measures. Project-level mitigation strategies could be more clearly defined to articulate how the Project will actively manage or reduce pressure on local labour markets or supply chains beyond general industry responses. The Proponent will expand mitigation measures to include: - Early contractor engagement and staged workforce planning; - Targeted sourcing strategies that prioritise regional capability where available without overcommitting local supply; - Coordination with other major projects (where feasible) to reduce peak demand overlap; and - Transparent reporting of workforce demand profiles. 2. Labour supply assumptions and Workforce Development Strategy The assessment identifies a peak construction workforce of up to 650 FTE, with only approximately 10% expected to be sourced locally, and the majority accommodated onsite. It also acknowledges that cumulative projects will create significant demand for skilled labour and may lead to shortages and wage escalation The Applicant agrees that Council's concern relating to this is valid. While the assessment does not explicitly overstate local labour supply, it does not present a detailed labour market capacity assessment or a structured framework for workforce development. The Applicant supports the preparation of a Workforce Development Strategy, to be developed in consultation with affected councils. This will: - Provide a realistic assessment of local and regional labour capacity; - Identify training and upskilling opportunities;	Section 7, Appendix B and Section 6.2.6 of Appendix N of the Amendment Report (ERM, 2026b) Table 4.14 of the Submissions Report (ERM, 2026a) Appendix B of the Amendment Report (ERM, 2026b)

Ref. No.	Theme	Submission	Response	Where Addressed
			- Outline strategies to maximise local employment without creating unsustainable labour competition; and - Define workforce sourcing proportions (local, regional, interstate, FIFO/DIDO). Inclusion as a Condition of Consent is supported. 3. Accommodation impacts and Workforce Accommodation Plan Appendix N recognises that cumulative development may increase demand for both short-term and long-term accommodation and lead to rental and housing pressures. The Project includes provision for a temporary worker accommodation camp and assumes a large proportion of the workforce will be housed onsite. While the issue is acknowledged, the assessment has had to rely on general economic theory (market adjustment and price signals). Accommodation demand is not quantified nor are capacity constraints in local housing markets assessed on the assumption that all or most of the workforce will be accommodated onsite. A Workforce Accommodation Plan will be prepared in consultation with Council, which will: - Quantify workforce accommodation demand over time; - Confirm the role and capacity of onsite accommodation; - Identify any residual demand on local housing and short-term accommodation; and - Include mitigation measures to avoid displacement of existing residents. Inclusion as a Condition of Consent is supported. 4. Cumulative impacts on material supply chains (concrete and gravel) The assessment identifies that cumulative projects may result in increased demand, price escalation, and potential shortages of key inputs such as quarry materials and concrete. Further detail will be provided in the relevant management plan to: - Identify key material inputs and indicative demand volumes; - Consider regional supply capacity and competing project demand (where data is available); - Outline procurement strategies, including use of multiple suppliers and potential sourcing outside the immediate region; and - Minimise disruption to existing local industries. 5. Housing availability statement The assessment discusses housing impacts largely through the lens of market dynamics, including supply and demand responses and price adjustments. Council's concern is noted. While the assessment does not explicitly attribute housing shortages to councils, some language (e.g., reference to planning systems influencing supply response) may be interpreted as assigning responsibility. The Applicant revises this statement to clarify that housing availability is driven by a range of structural, economic and market factors, which are not attributed to any single stakeholder.	

TABLE 1-7 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM MURRAY RIVER REGIONAL COUNCIL

Ref No	Theme	Submission	Response	Where Addressed
MRC-01	Community Benefits	Council would like to request further explanation of the following information within Section 4.14 of the RtS Report: <i>'Lastly the applicant has engaged with MRC regarding the establishment of a community benefit fund (CBF), to be administered via a planning agreement. The CBF will provide additional benefits to the region.'</i> Council requests explanation on the wording of 'additional benefits to the region,' if it refers to benefits in addition to what is included in the planning agreement, which the CBF is a part of. Are these benefits monetary, and if not, what are the benefits.	The establishment of a CBF aims to deliver additional advantages beyond those outlined in the Social Impact Assessment and Updated Economic Assessment, such as the gains linked to construction employment and economic activity. As noted in the Voluntary Planning Agreement Letter dated 12 January 2026, the specific benefits of the CBF remain under discussion. The Applicant is dedicated to continued collaboration with MRC to define the scope and nature of the contributions that will be provided. The reference to 'additional' was referring to the benefits that the CBF will provide, not additional benefits (aside from those detailed in the Social Impact Assessment and Economic Impact Assessment) administered outside of the CBF.	This table. Appendix R of the Amendment Report (ERM, 2026b)
MRC-03	Waste Management	<i>'The proponent will provide a waste management plan that is prepared in consultation with and approved by council. The WMP will specify appropriate waste disposal facilities and measures to achieve greater environmental outcomes from the waste produced.'</i> The wording surrounding waste does not acknowledge Council's stance that MRC facilities will not be accepting any project waste. Council requests a formal acknowledgement of Council's position.	The Applicant acknowledges Council's position that Murray River Council waste management facilities will not accept Project-generated waste. In response, the Waste Management Plan (WMP) will explicitly recognise this position and will not rely on Council-operated facilities. The WMP will instead identify appropriately licensed external waste management facilities and disposal pathways, and outline measures to minimise waste generation, maximise reuse and recycling, and ensure compliance with all regulatory requirements. The Applicant will continue to consult with Council in the preparation of the WMP to ensure alignment with local constraints and expectations, including formal acknowledgement of Council's position regarding waste acceptance.	This table.
MRC-04	Wastewater	<i>'The applicant does not anticipate that upgrades to MRCs existing waste water and sewage treatment plant will be necessary to accommodate sewage disposal during construction, however, if this is the case the Applicant will engage with MRC to find a solution.'</i> Council would appreciate further explanation on what these potential solutions would be and confirmation that Council would not be funding any such solution	The Applicant acknowledges Council's request for further detail regarding potential wastewater and sewage management solutions, as well as clarification of funding arrangements. While the current assessment anticipates that upgrades to Council's existing wastewater and sewage treatment infrastructure will not be required, the Proponent recognises the need to clearly define contingency measures should capacity constraints arise. If additional wastewater management solutions are required during construction, these would comprise project-specific, self-contained or privately managed arrangements, such as: - Use of onsite temporary wastewater treatment systems (e.g., packaged treatment plants or pump-out systems); - Engagement of licensed private waste contractors for collection, transport and disposal to suitably approved facilities outside the Murray River Council network; or - Establishment of temporary, purpose-built infrastructure that operates independently of Council systems. The Applicant confirms that any such solutions would be designed, implemented and funded entirely by the Project, and would not rely on, or require upgrades to, Council-owned infrastructure unless otherwise agreed by Council. The relevant management plans will: - Provide clarity on the wastewater management solution(s); and - Explicitly confirm that Council would not be responsible for funding, delivering or operating any infrastructure required to service the Project.	This table.

Ref No	Theme	Submission	Response	Where Addressed
			The Applicant will continue to consult with Council to ensure that wastewater and sewage management approaches are consistent with local constraints and expectations.	
MRC-05	Wastewater	<i>'The above non-potable water options will not impact MRC assets or water supply.'</i> What processes do the proponent have in place to ensure this.	The Applicant acknowledges Council's request for clarification regarding the processes in place to ensure that non-potable water sourcing will not impact Murray River Council assets or water supply. The Applicant has confirmation from the BSC that they can supply the Projects potable and non-potable water demand. Regardless, the Applicant is committed to implementing a robust and transparent framework to manage water sourcing and use during construction and operation. This will be formalised through the preparation of a Water Sourcing Plan, to be developed in consultation with relevant councils, the NSW DCCEEW Water and the selected construction contractor. The Plan will ensure that all water demands associated with the Project are met without adversely affecting Council infrastructure or local water availability. Key processes to achieve this outcome will include: - Regulatory approvals and volume limits: All water extraction will be undertaken in accordance with relevant water access licences and approvals, including strict adherence to volumetric limits and conditions imposed by NSW DCCEEW Water. These approvals will be secured prior to the commencement of construction and operation. - Source selection and impact avoidance: Non-potable water will be sourced from appropriately licensed suppliers or approved extraction points that do not rely on, or place demand on, MRC-operated water supply systems. The Applicant has also engaged with Balranald Shire Council regarding potential non-potable water supply options to further diversify supply sources and reduce reliance on any single jurisdiction. - Monitoring and compliance: Water use will be monitored and recorded to ensure compliance with approved limits and conditions. This will include tracking volumes extracted, transported and used onsite, and implementing adaptive management measures if required. - Infrastructure separation: Water sourcing, transport and storage infrastructure will be designed to operate independently of Council assets, ensuring no physical or operational reliance on MRC systems. - Contingency planning: The Water Sourcing Plan will identify alternative supply options to manage variability in water availability without placing additional demand on local water resources or Council infrastructure.	This table.
MRC-06	Traffic and Transport	<i>'The condition of roads will be monitored throughout construction. Any damage that results in safety risk to road users will be repaired immediately by the applicant. All other damage (beyond usual wear and tear) will be repaired to the pre-construction condition.'</i> - Council requests further information on the planned frequency on monitoring throughout construction. - The 'usual wear and tear,' how is an increased volume of vehicles bringing increased usual wear and tear that then causes damage addressed in this context.	The Applicant acknowledges Council's request for further detail regarding the frequency of road condition monitoring and clarification of how "usual wear and tear" will be defined and managed in the context of increased traffic volumes. The Proponent will undertake a structured program of road condition monitoring, with the frequency and methodology to be determined in consultation with TfNSW and relevant councils. This is expected to include: - A pre-construction dilapidation survey to establish baseline road conditions across all identified haulage routes; - Regular monitoring during construction, including scheduled inspections (e.g., monthly or at agreed intervals depending on traffic intensity and road sensitivity), and - Event-based inspections, such as following significant weather events or periods of intensive construction traffic.	This table.

Ref No	Theme	Submission	Response	Where Addressed
			This approach will ensure that any deterioration in road condition attributable to the Project is identified early and managed proactively in consultation with Council. The Proponent acknowledges the need to clearly define and appropriately manage the concept of “usual wear and tear” in the context of increased construction traffic. In this regard: - Austroads guidance indicates that pavement damage is primarily driven by axle loading and traffic load intensity, rather than vehicle numbers alone; - Accordingly, traffic operating within the existing design capacity of the road network would generally be considered consistent with “normal” or expected wear; and - Sustained or concentrated heavy vehicle movements, particularly where they exceed typical load profiles or frequency, may result in impacts beyond usual wear and tear. To address this: - The Applicant will monitor traffic volumes, vehicle types, and loading characteristics along haulage routes; - Any road deterioration attributable to Project-related heavy vehicle use, and assessed as exceeding normal wear and tear based on the baseline condition and monitoring data, will be rectified by the Proponent; and - Mitigation measures (e.g., traffic scheduling, load management, or route adjustments) will be implemented where monitoring identifies increased risk of accelerated pavement degradation. The Proponent commits to: - Undertaking a comprehensive pre-construction dilapidation survey; - Agreeing on monitoring frequency and methodology with TfNSW and Council; and - Repairing any Project-related damage beyond normal wear and tear to at least the pre-construction condition, based on the established baseline.	
MRC-07	Community Benefits	<i>'The applicant will also establish, via the CBF, vocational courses targeted at developing skills relevant to the construction and operation of the Project.'</i> Council appreciates the inclusion of vocational courses and would appreciate any further information on the planned timing of such courses from approval to construction of the project.	The Applicant acknowledges Council’s support for the inclusion of vocational training opportunities and provides the following clarification regarding the proposed timing and delivery of these initiatives. The Applicant intends to explore opportunities to deliver vocational training programs aligned with the Project delivery timeline, with a focus on maximising local workforce readiness ahead of peak construction demand. Subject to final project approval and procurement timelines, the anticipated approach is as follows: - Pre-construction phase (post-approval): Early engagement with local and regional training providers, industry bodies and councils to identify skill gaps and design targeted training programs relevant to construction and operational roles (e.g., civil works, electrical trades, plant operation, and maintenance); - Lead-in to construction: Delivery of initial training courses prior to, or in the early stages of, construction to enable local and regional residents to participate in the Project workforce where feasible. This may include short courses, certifications and entry-level qualifications aligned with contractor requirements; and - Construction phase: Ongoing or staged delivery of additional training opportunities to support workforce transitions, upskilling, and longer-term employment pathways, including for operational roles where relevant.	This table.

Ref No	Theme	Submission	Response	Where Addressed
			The timing, structure and scope of vocational programs will be developed in consultation with Council, training providers and relevant stakeholders, and will be responsive to procurement outcomes and contractor workforce requirements. The relevant management plans will specify a staged approach and confirm its commitment to early implementation of training initiatives to maximise local participation in Project-related employment opportunities.	

TABLE 1-8 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE NSW STATE EMERGENCY SERVICE

Ref No.	Theme	Submission	Response	Where Addressed
SES-01	Hazards	Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan and the Murray River Council Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.	Noted. The Applicant has and will continue to engage with relevant local councils and NSW SES regarding flood emergency management and are committed to developing a Flood Emergency Response Plan. Strategies will be compatible with those identified in the NSW State Flood Plan and the Murray River Council Flood Emergency Sub Plan, with evacuation recommended as the preferred emergency management strategy consistent with Section 4.4 of the Addendum to the Flood Impact Assessment.	This table Appendix H of the Amendment Report (ERM, 2026b)
SES-02	Hazards	Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed. Further, risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% Annual Exceedance Probability (AEP) flood. Climate change should also be considered. It is noted that the site itself is bounded by Abercrombie Creek to the south and is affected by breakout flooding from the Murrumbidgee River system. The site is affected by flooding as frequently as the 5% AEP event with several shallow flow paths crossing the site. During the PMF event the majority of the site becomes inundated, becoming a Low Flood Island. The Flood Report Addendum states "Proposed developments are subject to depths of 0.5-1m, and Hazard Category H3. Depths of 1-2m and Hazard Category H4 are estimated at some WTG locations" We support the strategy proposed in the Flood Assessment Addendum which states that "In the event of a local warning advising of the potential for flooding it is recommended that the site is closed and evacuated." Low Flood Islands present a risk to life to anyone remaining on the site, pre-emptive site evacuation on receipt of flood warnings is a suitable strategy for managing the risk at this location. We recommend pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community, including during the proposed upgrades to external intersections. Any improvements to flood resilience that can be made to reduce flood risk will benefit the community, particularly during the construction phase when the expected traffic to and from the site presents an increase in traffic on rural roads. This includes the proposed mitigation measures, but also the provision of rising road access/egress away from the flooding where feasible.	Noted. The detailed design for the Project will continue to consider risks relating to flooding and emergency management. Flood impacts were estimated for all requested design storm events – 5% AEP, 1% AEP, 0.5% AEP, 0.2% AEP and PMF. The 0.5% AEP and 0.2% AEP were modelled as proxies for increased rainfall intensity in a 1% AEP due to climate change were also considered. The Applicant will continue to assess the potential impact of the Project on flood behaviour as the design progresses. Likewise, the design of the Project including stormwater management will consider measures that reduces the impact of flooding, improve flood resilience, and minimise risk to the community.	This Table. Section 4.3, Annex C of Appendix H of the Amendment Report (ERM, 2026b)

Ref No.	Theme	Submission	Response	Where Addressed
SES-03	Hazards	The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development. Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water. Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.	Noted. The Project is not anticipated to affect the ability of the existing community to effectively respond to a flood or generate the need for a mass rescue. The Applicant will continue to engage with NSW SES regarding the Flood Emergency Response Plan to consider evacuation demand and the impacts of localised flooding on existing and future access/egress routes that do not require people to travel through flood water.	This table.
SES-04	Hazards	Managing flood risks associated with Low Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of: - Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated. - Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making. - Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered. Current evidence suggests that flood events will become more frequent due to climate change. A Climate Change Calculator has been developed to address the updated ARR climate change guidelines, recommending the adjustment of the BoM 2016 IFDs to account for the warming that has occurred since the mid-point of the data used for their development (1961-1990). This results in a significant increase in existing conditions flood levels. The change in flood probabilities with climate change for this catchment area results in the new probability of the 1 in 100 AEP to be approximately 1 in 68 AEP event for the current scenario, becoming even more frequent in the future. For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.	Noted. The Flood Emergency Response Plan will include consideration of isolation, secondary risks and human behaviour in relation to Low Flood Islands. The Addendum Flood Assessment included updated hydraulic modelling 0.5% and 0.2% as proxies for increased rainfall intensity in a 1% AEP due to climate change.	This table. Section 4.3 of Appendix H of the Amendment Report (ERM, 2026b)
SES-05	Hazards	Any Emergency Management strategy needs to consider people visiting the area or using a development.	Noted. The Flood Emergency Response Plan will include consideration of people visiting the area or using the development.	This table.
SES-06	Hazards	An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner. NSW SES utilises the Australian Warning System, which is a nationally consistent, three-tiered approach to issue clear warnings and lead people to take action ahead of severe weather events. The three warning tiers consist of Advice, Watch and Act and Emergency Warning. These warnings can be viewed on the SES website and the HazardWatch website and app.	Noted. An effective flood warning strategy will be detailed in the Flood Emergency Response Plan.	This table.
SES-07	Social	Development within a floodplain will necessitate ongoing involvement from the NSW SES in community awareness, preparedness, and response activities. It is essential that all site users both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life. This includes:	Noted. The Applicant will continue to engage with NSW SES regarding raising awareness and informing workers and the community of available resources.	This table.

Ref No.	Theme	Submission	Response	Where Addressed
		- Raising awareness of flood risk - Strengthening community connections - Promoting preparedness actions - Installing appropriate signage - Conducting emergency drills Importantly, a private flood management plan is insufficient to address flood risk on this site. Residents and users of the proposed development should be made aware of their flood risk and be encouraged to use available tools and resources, including: - Hazards Near Me app – part of the Australian Warning System, providing timely flood warnings - NSW SES website – offering comprehensive guidance on flood preparedness, response, and recovery, including multilingual resources - HazardWatch – an interactive platform for accessing real-time flood information and warnings		

TABLE 1-9 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE HERITAGE COUNCIL OF NSW

Ref No	Theme	Submission	Response	Where Addressed
HC-01	State Heritage	The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the micro siting corridor does not contain any known historical archaeological relics. Therefore, no heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW. As the site contains a local heritage item, and other local items are in the vicinity, you should seek advice from the relevant local council.	Noted.	This table.

TABLE 1-10 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM WATER NSW

Ref No	Theme	Submission	Response	Where Addressed
WNSW-01	Water	In our submission to the Environmental Impact Statement, we noted that the proposal area is not located near any WaterNSW land, assets or infrastructure and raised no specific requirements regarding any potential impacts. Noting the above, WaterNSW has no further comments or requirements regarding the proposal	Noted.	This table.

TABLE 1-11 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM CROWN LANDS

Ref No	Theme	Submission	Response	Where Addressed
CL-01	Crown Lands	For the use and access of Crown land, roads, or waterways within the project footprint, the following considerations apply: Any use or occupation of the Crown land during the assessment phase will require consultation with Crown Lands to obtain the necessary authority under the <i>Crown Land Management Act 2016</i> and/or the <i>Roads Act 1993</i>.	Noted. The Applicant will consult with Crown Lands regarding obtaining necessary authority under relevant legislation for use or occupation of Crown land during assessment phase, if the use and access of Crown land is required.	This table.

Ref No	Theme	Submission	Response	Where Addressed
CL-02	Crown Lands	Crown Lands notes that there are several Crown roads within the project area. These roads may provide legal access to the development but may not provide practical access.	Noted.	This table.
CL-03	Crown Lands	Authority to use, traverse, access, or construct infrastructure on Crown land and roads is required under the <i>Crown Land Management Act 2016</i> and/or the <i>Roads Act 1993</i>. It is recommended that the proponent contact Crown Lands as early as possible to discuss and initiate the necessary processes to authorise the use of and/or access to Crown land and roads. If infrastructure is to be built on Crown land or roads, consent from the Minister for Water, Property and Housing (via Crown Lands) will be required.	Noted. The Applicant has already facilitated the purchase of two sets of Crown (paper) roads, covering most Crown roads within the Development Area, on behalf of the relevant landowners. These parcels are currently in the process of being incorporated into the relevant Agreements for Lease (AFLs). In addition, one host landowner has independently purchased multiple Crown road parcels, which are also in the process of being incorporated into the relevant AFLs. Several Crown roads remain under Crown tenure. The Applicant has commenced engagement with Crown Lands regarding these parcels and will continue to progress the necessary approvals and authorisations required for the use of and access to Crown land and roads during the construction and operation of the Project. The Applicant does not currently foresee that infrastructure will be required to be constructed on Crown land. However, should infrastructure on Crown land be required, the Applicant will seek the necessary approvals and consents from the relevant Minister and Crown Lands prior to undertaking those works.	This table.
CL-04	Crown Lands	In order for any construction and/or works on Crown land and/or roads, the proponent will need to apply for a licence, this should be done as soon as possible for any crown land effected by the development (including blade overhang). Further information can be found here: Licences Crown Lands	Internal access roads will need to be constructed over Crown Land (Crown roads). The Applicant will seek the necessary approval from the Minister of Water, Property and Housing to do so.	This table.
CL-05	Crown Lands	If Crown roads are required for access, they may need to be transferred to Council, or an application made to close and purchase the roads. Interim tenure may be required to avoid delays	Noted.	This table.

TABLE 1-12 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE DEPARTMENT OF PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT – FISHERIES

Ref No	Theme	Submission	Response	Where Addressed
DPIF-01	Water	The Response to Submissions Report has been reviewed, and DPIRD Fisheries provides the following advice: In reference to Table 4.8 of the report, which details responses to aquatic habitat matters raised by DPIRD Fisheries, DPIRD Fisheries advises that it has no further comments at this stage of the proposal.	Noted.	This table.

TABLE 1-13 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM FIRE AND RESCUE NSW

Ref No	Theme	Submission	Response	Where Addressed
FRNSW-01	Hazards	FRNSW have reviewed the Amendment Report with particular focus to Section 3 – Description of Amendments. FRNSW submit no further comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage	Noted.	This table.

Ref No	Theme	Submission	Response	Where Addressed
FRNSW-02	Hazards	FRNSW have reviewed the RTS with particular focus to Section 4.10. FRNSW note the responses in Table 4.10 of the Submissions Report include “may involve developing.” FRNSW clarifies recommendations made in our previous letter dated 23 May 2024 (D24/063560) are to develop the identified measures and, when implemented, would satisfy the recommendations made by FRNSW.	Noted. The Applicant is committed to developing a Fire Safety Study (FSS). This will include an Initial Fire Safety Report and/or Performance-Based Brief / Fire Engineering Brief Questionnaire. The FSS will be prepared in accordance with ‘FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations’ and will be submitted to FRNSW for review.	This table.

TABLE 1-14 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE NSW RURAL FIRE SERVICE

Ref No	Theme	Submission	Response	Where Addressed
RFS-01	Bushfire	NSW RFS has reviewed the Submissions Report (16/1/2026) and Amendment Report (16/1/2026) prepared by ERM for the Keri Keri Wind Farm. No objection is raised subject to the following: - A condition being included in development consent for compliance with bush fire mitigation measures detailed in Section 6.8 and Table 6-1 of the Bush Fire Assessment Report by ERM dated 12 April 2024. - The 35 metre APZs (for various infrastructure) indicated in the Amendment Report prepared by ERM dated 16 January 2026 are maintained. Note: This (35m APZ) should be retained due to the remote location of each of the infrastructure items. - An electronic copy of the Emergency Management & Operations Plan (when prepared and including any updates) referred to in Table 6-8 of Appendix N Bush Fire Risk Assessment prepared by ERM dated 12 April 2024 shall also be provided to the RFS Mid Murray Zone Office - Macknight Drive, Deniliquin NSW 2710 (ph 03 5898 4100) or at midmurray.zone@rfs.nsw.gov.au.	Noted. The Applicant will maintain a 35 m asset protection zone for the lifetime of the Project and provide an electronic copy of the Bushfire Emergency Management and Operations Plan to the NSW RFS Mid Murray Zone Office.	This table.

TABLE 1-15 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM AIRSERVICES AUSTRALIA

Ref No	Theme	Submission	Response	Where Addressed
ASA-01	Aviation	Our advice remains valid if there is no change to the location and height of the proposed wind farm.	Noted.	This table.

TABLE 1-16 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE CIVIL AVIATION SAFETY AUTHORITY

Ref No	Theme	Submission	Response	Where Addressed
CASA-01	Aviation	CASA has briefly reviewed the Aviation Safety aspects of the following: - Submissions Report of 16 January 2026 by ERM. - Aviation Impact Assessment Technical Memorandum by Aviation Projects. - Amendment Report 16 January 2026 by ERM, specifically 6.6.2. - Landscape and Visual Impact Assessment 3.1 Aviation Lighting by Moir. The tip height is 291.5m. Aviation Impact Assessment Technical Memorandum advises: “Prior to construction, a lighting plan will be prepared in accordance with NASF Guideline D and in consultation with CASA”. CASA is happy to review lighting plans and also shielding proposals (as described in Landscape and Visual Impact Assessment 3.1 Aviation Lighting).	Noted.	This table.

Ref No	Theme	Submission	Response	Where Addressed
CASA-02	Aviation	The Amendment Report describes changes to Lowest Safe Altitudes (LSALT). Noted ...CASA has no issues.	Noted.	This table.
CASA-03	Aviation	Amendment Report 6.6.2.4 discusses wake turbulence at Keri Keri and Jeraly aerodromes. Noted.	Noted.	This table.
CASA-04	Aviation	Amendment Report 'Mitigation Measures' describes consultation with aerial application operators. A worthwhile initiative. To be sure, the operators (or landowners) would have a better idea of where markers are required than this office.	Noted.	This table.
CASA-05	Aviation	CASA does not object to the 'Keri Keri Wind Farm' project, noting that the CASA recommendations in the previous CASA assessment of June 2024 remain applicable.	Noted.	This table.

TABLE 1-17 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE DEPARTMENT OF PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT – AGRICULTURE AND BIOSECURITY

Ref No	Theme	Submission	Response	Where Addressed
DPIRD-01	Agricultural Land	The Department has reviewed the Response to Submissions, Amendment Report and amended Agricultural Impact Assessment for how they have considered and addressed the potential impact of the proposed development on agricultural land and agricultural production in the locality. The Department notes that the reports consider that there will be reduced agricultural impacts due to the reduced number of WTGs and therefore reduced temporary and permanent footprints. According to the reports, mitigation and management measures are considered adequate.	Noted.	This table.

TABLE 1-18 RESPONSE TO A REQUEST FOR ADDITIONAL INFORMATION FROM THE NSW ENVIRONMENT PROTECTION AUTHORITY

Ref No	Theme	Submission	Response	Where Addressed
EPA-01	Environmental Impacts	The EPA understands that the amendments have generally reduced the potential environmental impacts caused by the project, however, we note the following increases to permanent infrastructure: • Increase of 0.7 km of 220 kV or 330 kV transmission line, noting that the amendment also includes a reduction of 3.79 km of 330 kV transmission line. • Increase of 20.3 km of underground 33 kV line, noting that the amendment also includes a reduction of 64.5 km overhead 33 kV transmission line. We also note the following proposed increases to temporary facilities supporting the construction of the project: • Increase of 1 laydown area. • Addition of 2 construction carparks. The EPA provided recommended conditions of consent in correspondence sent to the Department of Planning, Housing and Infrastructure on 19 June 2024 and have no additional comments that need to be added from what was previously provided.	Noted.	This table.

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- ERM. (2024). *Keri Keri Farm Environmental Impact Statement*. Retrieved April 2026, from <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-38358962%2120240418T234117.620%20GMT>
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ATTACHMENT A AFFECTED LOTS AND LANDOWNER CONSENT

lotnumber	plannumber	planlabel	controllin	LotPlan	Land_Owner	Directors
83	751231	DP751231	FREEHOLD	83/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
76	756546	DP756546	FREEHOLD	76/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
86	751231	DP751231	FREEHOLD	86/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
48	756546	DP756546	FREEHOLD	48/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
54	756546	DP756546	FREEHOLD	54/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
62	756546	DP756546	FREEHOLD	62/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
35	756546	DP756546	FREEHOLD	35/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
81	756558	DP756558	FREEHOLD	81/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
85	756558	DP756558	FREEHOLD	85/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
54	751231	DP751231	FREEHOLD	54/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
39	756546	DP756546	FREEHOLD	39/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
80	756558	DP756558	FREEHOLD	80/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
55	751231	DP751231	FREEHOLD	55/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
75	756546	DP756546	FREEHOLD	75/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
85	751231	DP751231	FREEHOLD	85/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
82	756546	DP756546	FREEHOLD	82/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
58	756546	DP756546	FREEHOLD	58/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
32	756546	DP756546	FREEHOLD	32/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
66	756546	DP756546	FREEHOLD	66/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
64	756546	DP756546	FREEHOLD	64/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
70	756546	DP756546	FREEHOLD	70/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
84	751231	DP751231	FREEHOLD	84/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
82	756558	DP756558	FREEHOLD	82/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
69	756546	DP756546	FREEHOLD	69/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
34	756546	DP756546	FREEHOLD	34/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
49	756546	DP756546	FREEHOLD	49/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
67	756546	DP756546	FREEHOLD	67/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
68	756546	DP756546	FREEHOLD	68/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
65	756546	DP756546	FREEHOLD	65/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
72	756546	DP756546	FREEHOLD	72/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
77	756546	DP756546	FREEHOLD	77/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
52	756546	DP756546	FREEHOLD	52/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
53	756546	DP756546	FREEHOLD	53/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
74	756546	DP756546	FREEHOLD	74/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
73	756546	DP756546	FREEHOLD	73/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
37	756546	DP756546	FREEHOLD	37/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
87	751231	DP751231	FREEHOLD	87/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
33	756546	DP756546	FREEHOLD	33/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
84	756546	DP756546	FREEHOLD	84/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
56	756546	DP756546	FREEHOLD	56/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
47	756546	DP756546	FREEHOLD	47/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
71	756546	DP756546	FREEHOLD	71/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
36	756546	DP756546	FREEHOLD	36/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
56	751231	DP751231	FREEHOLD	56/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
57	756546	DP756546	FREEHOLD	57/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
63	756546	DP756546	FREEHOLD	63/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
93	756546	DP756546	FREEHOLD	93/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
94	756546	DP756546	FREEHOLD	94/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
55	756546	DP756546	FREEHOLD	55/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
57	751231	DP751231	FREEHOLD	57/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
40	756546	DP756546	FREEHOLD	40/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
58	751231	DP751231	FREEHOLD	58/DP751231	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
9	751231	DP751231	FREEHOLD	9/DP751231	PETER RAYMOND DOWLING	RAYMOND ANDREW DOWLING
13	751231	DP751231	FREEHOLD	13/DP751231	PETER RAYMOND DOWLING	N/A
11	1120173	DP1120173	FREEHOLD	11/DP1120173	PETER RAYMOND DOWLING	N/A
14	751231	DP751231	FREEHOLD	14/DP751231	PETER RAYMOND DOWLING	N/A
19	751175	DP751175	FREEHOLD	19/DP751175	RAYMOND ANDREW DOWLING	N/A
1	751175	DP751175	FREEHOLD	1/DP751175	RAYMOND ANDREW DOWLING	N/A
59	756546	DP756546	FREEHOLD	59/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
38	756546	DP756546	FREEHOLD	38/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
79	756558	DP756558	FREEHOLD	79/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
78	756558	DP756558	FREEHOLD	78/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
60	756546	DP756546	FREEHOLD	60/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
61	756546	DP756546	FREEHOLD	61/DP756546	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
77	756558	DP756558	FREEHOLD	77/DP756558	KERI KERI PASTORAL CO PTY. LIMITED	RAYMOND ANDREW DOWLING
12	751231	DP751231	FREEHOLD	12/DP751231	JOHN EDWARD GLENN	N/A
9	658690	DP658690	FREEHOLD	9//DP658690	BENJAMIN MAHER	N/A

08 April 2024

To:

Raymond Andrew Dowling
'Keri Keri Station',
2304 Keri Keri Road,
Moulamein NSW 2733.

Dear Raymond Andrew Dowling,

Owner's Consent for Environmental Impact Statement Lodgement

The Keri Keri Wind Farm and Battery Energy Storage System requires approval under both NSW and Commonwealth environmental and planning legislation. The project has been classified as a State Significant Development (SSD) and therefore requires approval under Part 4 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). The regulator for the approval is the Department of Planning, Housing and Infrastructure (DPHI).

Acciona Energía is ready to formally lodge the Environmental Impact Statement (EIS) in accordance with Schedule 2 and Part 10 of the Environmental Planning Assessment Regulation 2021.

The details of the following lots are associated with 'Keri Keri Station', 2304 Keri Keri Road, Moulamein NSW 2733 will be utilised to develop, construct, operate, maintain and (eventual) decommission of the proposed Keri Keri Wind Farm project.

Lot Number	Plan Number	Plan Label	Lot/Plan
83	751231	DP751231	83/DP751231
76	756546	DP756546	76/DP756546
86	751231	DP751231	86/DP751231
54	756546	DP756546	54/DP756546
62	756546	DP756546	62/DP756546
35	756546	DP756546	35/DP756546
81	756558	DP756558	81/DP756558

85	756558	DP756558	85/DP756558
54	751231	DP751231	54/DP751231
39	756546	DP756546	39/DP756546
80	756558	DP756558	80/DP756558
55	751231	DP751231	55/DP751231
75	756546	DP756546	75/DP756546
85	751231	DP751231	85/DP751231
82	756546	DP756546	82/DP756546
58	756546	DP756546	58/DP756546
66	756546	DP756546	66/DP756546
64	756546	DP756546	64/DP756546
70	756546	DP756546	70/DP756546
84	751231	DP751231	84/DP751231
82	756558	DP756558	82/DP756558
69	756546	DP756546	69/DP756546
67	756546	DP756546	67/DP756546
68	756546	DP756546	68/DP756546
65	756546	DP756546	65/DP756546
72	756546	DP756546	72/DP756546
77	756546	DP756546	77/DP756546
53	756546	DP756546	53/DP756546

74	756546	DP756546	74/DP756546
73	756546	DP756546	73/DP756546
37	756546	DP756546	37/DP756546
87	751231	DP751231	87/DP751231
84	756546	DP756546	84/DP756546
56	756546	DP756546	56/DP756546
71	756546	DP756546	71/DP756546
36	756546	DP756546	36/DP756546
56	751231	DP751231	56/DP751231
57	756546	DP756546	57/DP756546
63	756546	DP756546	63/DP756546
93	756546	DP756546	93/DP756546
94	756546	DP756546	94/DP756546
55	756546	DP756546	55/DP756546
57	751231	DP751231	57/DP751231
40	756546	DP756546	40/DP756546
58	751231	DP751231	58/DP751231
9	751231	DP751231	9/DP751231
13	751231	DP751231	13/DP751231
11	1120173	DP1120173	11/DP1120173
14	751231	DP751231	14/DP751231

19	751175	DP751175	19/DP751175
1	751175	DP751175	1/DP751175
59	756546	DP756546	59/DP756546
38	756546	DP756546	38/DP756546
79	756558	DP756558	79/DP756558
78	756558	DP756558	78/DP756558
60	756546	DP756546	60/DP756546
61	756546	DP756546	61/DP756546
77	756558	DP756558	77/DP756558
32	756546	DP756546	32/DP756546
33	756546	DP756546	33/DP756546
34	756546	DP756546	34/DP756546
47	756546	DP756546	47/DP756546
48	756546	DP756546	48/DP756546
49	756546	DP756546	49/DP756546
52	756546	DP756546	52/DP756546

As the owner of the land identified above, Raymond Andrew Dowling accepts this letter and agreed to provide the consent for the lodgement of the Environmental Impact Statement to the Department of Planning, Housing and Infrastructure based on the details of the lots provided in this letter.



ACCIONA Energía
Level 38, 360 Elizabeth Street
Melbourne, Victoria, Australia 3000
PO Box 24110 Melbourne , 3001
Phone: +61 3 9027 1000
www.accionacom.au

Yours sincerely

Cairan Dillon
State Manager – VIC and SA

Signature:

A handwritten signature in black ink, appearing to be "CD", written over a light blue horizontal line.

Signed on behalf of Raymond Andrew Dowling, Keri Keri Pastoral Co Pty Ltd
(Landowner)

Keri Keri Station, 2304 Keri Keri Road, Moulamein, NSW 2733

03 April 2024

To:

John Edward Glenn
6003 Swan Hill Road,
Moulamein NSW 2733.

Dear John Edward Glenn,

Owner's Consent for Environmental Impact Statement Lodgement

The Keri Keri Wind Farm and Battery Energy Storage System requires approval under both NSW and Commonwealth environmental and planning legislation. The project has been classified as a State Significant Development (SSD) and therefore requires approval under Part 4 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). The regulator for the approval is the Department of Planning, Housing and Infrastructure (DPHI).

Acciona Energía is ready to formally lodge the Environmental Impact Statement (EIS) in accordance with Schedule 2 and Part 10 of the Environmental Planning Assessment Regulation 2021.

The lot 12/DP751231 which is associated with 'Millicent' Sturt Highway, Keri Keri NSW 2711 will be utilised to develop, construct, operate, maintain and (eventual) decommission of the proposed Keri Keri Win Farm project.

As the owner of the land identified above, we kindly request you to provide the consent for the lodgement of the Environmental Impact Statement to the Department of Planning, Housing and Infrastructure based on the details of the lots provided in this letter.

Yours sincerely

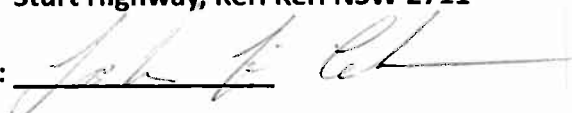
Cairan Dillon
State Manager – VIC and SA

Acceptance of Letter

Name: John Edward Glenn (Landowner)

'Millicent' Sturt Highway, Keri Keri NSW 2711

Signature: _____



Tom Parry

From: Lloyd, Fraser <fraser.lloyd@acciona.com>
Sent: Tuesday, 5 May 2026 10:41 AM
To: Mark Davey; Tom Parry
Cc: Mathers, Adam; Perez Ezpeleta, Xabier
Subject: Fw: EXT: Re: Follow-up on transport route discussions and agreement in principle

EXTERNAL MESSAGE

Hi Mark, Tom,

Please see below from the private landowner in relation to the transport route upgrades.

We will continue to progress, but in the meantime, I hope this is sufficient evidence?

Kind Regards,

Fraser



Fraser Lloyd
Project Developer

Level 5, 20 Bond St
Sydney, NSW, 2000
Australia
+61 473 954 839

WWW.ACCIONA.COM.AU



From: Benjamin Maher <Ben@mahers247.com.au>
Sent: 02 May 2026 8:46 PM
To: Lloyd, Fraser <fraser.lloyd@acciona.com>
Cc: Mathers, Adam <adam.mathers@acciona.com>
Subject: EXT: Re: Follow-up on transport route discussions and agreement in principle

Hi Fraser,

Thanks for the summary. I can confirm I'm supportive in principle of the proposed use of a small portion of my land for the transport route, including any temporary access and required upgrade works. I'm also willing to enter into an agreement, subject to acceptable terms.

Also as discussed, previous companies and I have had the agreement to onboard my company for any plumbing works that may arise from the project.

I look forward to reviewing the draft agreement.

Kind regards,
Ben Maher

From: Lloyd, Fraser <fraser.lloyd@acciona.com>
Sent: Wednesday, April 29, 2026 11:23 AM
To: Benjamin Maher <Ben@mahers247.com.au>
Cc: Mathers, Adam <adam.mathers@acciona.com>
Subject: Follow-up on transport route discussions and agreement in principle

Hi Ben,

Thanks again for taking the time to speak with me earlier – I appreciate your willingness to work with us on this.

I just wanted to summarise our discussion to make sure we're aligned.

As discussed, we are progressing plans for the transport route associated with the proposed wind farm, and there is a section near your property where turbine blades are likely to require a small area of land on the inside of the corner to safely pass through. This would involve temporary access and some upgrade works to make the area trafficable, potentially including hardstand installation and relocation of any constraints within the swept path.

You confirmed that you are open to entering into an agreement with us to facilitate this, subject to agreeing appropriate terms.

You also noted that:

- You would be interested in being onboarded as a contractor (specifically in relation to plumbing works) so that you are considered for any relevant opportunities during construction, noting there is no expectation of being awarded work
- You have previously entered into 5-year arrangements with other companies and would be open to a similar approach here, depending on the structure of the agreement

From our side, we will now begin working with our legal team to prepare a suitable agreement reflecting what we've discussed. We'll share this with you in due course for your review and input.

In the meantime, it would be helpful if you could please confirm (by reply to this email) that:

- You are supportive in principle of the proposed use of a small portion of your land for the transport route (as described above); and
- You are willing to enter into an agreement with us, subject to agreeing terms

This will assist us in demonstrating progress to the Department of Planning.

Please feel free to reach out if you have any questions in the meantime, and I'll be in touch once we have a draft agreement ready.

Thanks again,
Fraser



Fraser Lloyd
Project Developer

Level 5, 20 Bond St
Sydney, NSW, 2000
Australia
+61 473 954 839

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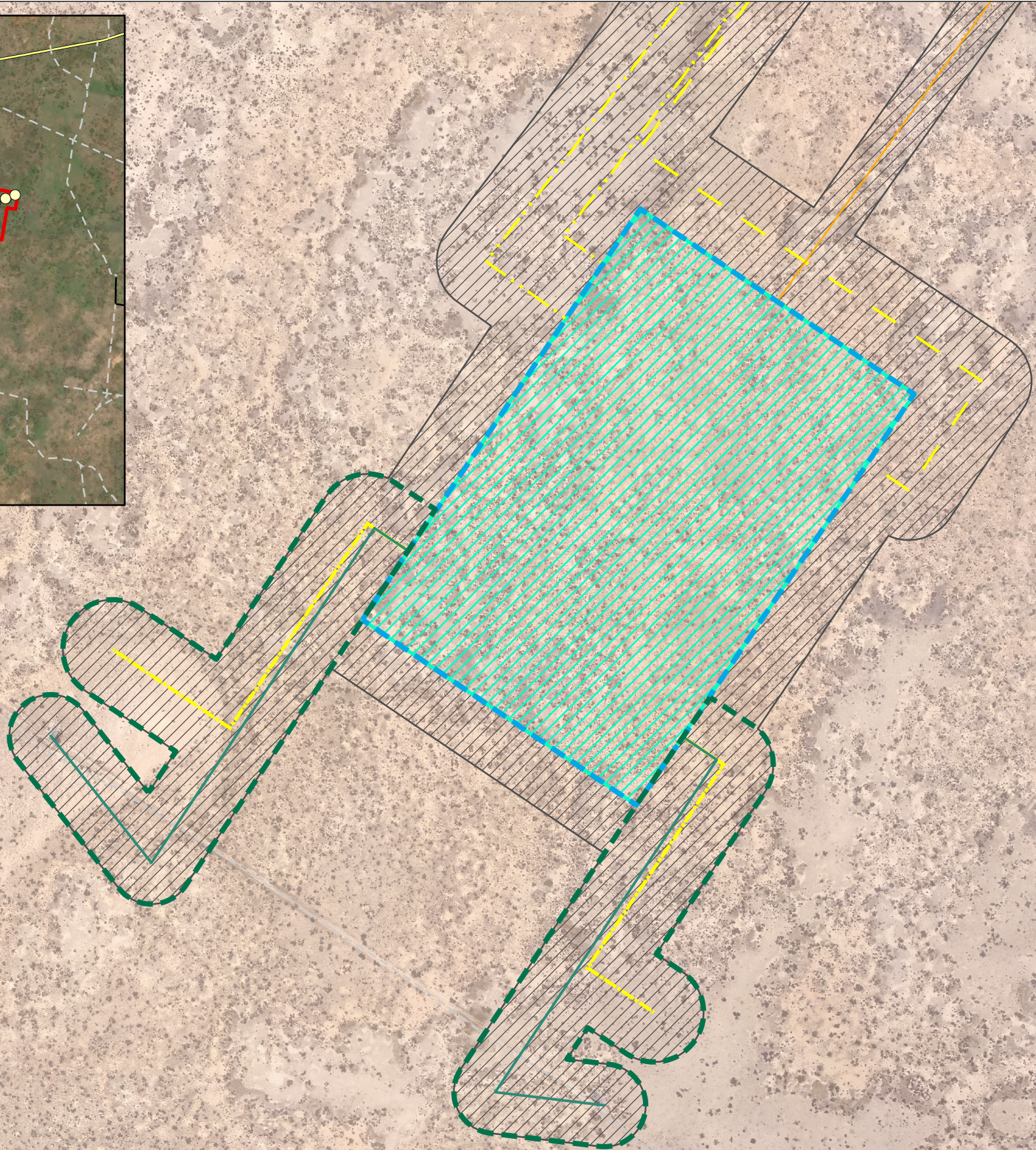
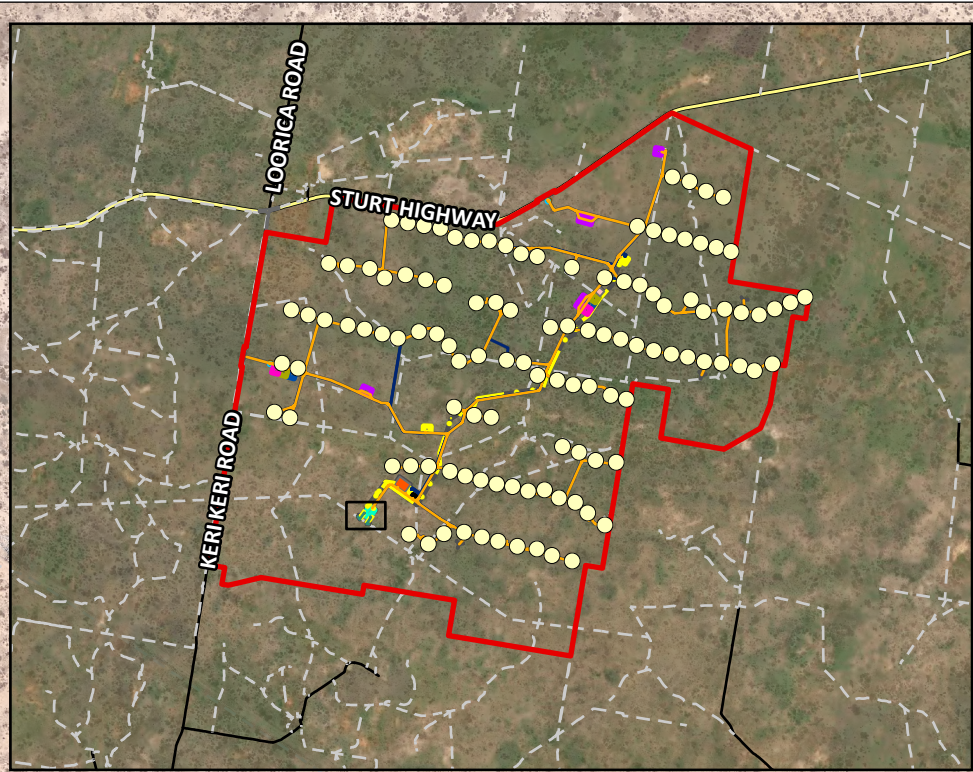


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Sydney, NSW, 200

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ATTACHMENT B UPDATED SUBDIVISION PLAN



Legend

- Project Area
- Indicative Subdivision Boundary (6ha)
- Indicative Proposed Transmission Easement (4.8ha)
- Access Track
- 220kV Connection Overhead Line
- 330kV Overhead Line
- 20250912 KKWF 330kV Connection OHTL
- Switching Station
- Development Footprint
- Path/Track

Source:
Boundary: Client Provided (date)
Base Data: NSW DCDB/DTDB.
Imagery: ESRI World Imagery

Coordinate System:
GDA 1994 MGA Zone 54
Date: 01/07/2026
Created By: VN
Drawing Size: A3
0 50 100m
1:3,000

Indicative Subdivision

Keri Keri Windfarm

Acciona



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Sydney, NSW, 200

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ATTACHMENT C AMENDED BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT V2

ATTACHMENT D ADDENDUM TO THE TRANSPORT IMPACT ASSESSMENT

ATTACHMENT E ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT V3