

6 February 2025

Attention: Kerri Keri Wind Farm; SSD - 38358962

Dear Sir and/or Madam

Thank you for the opportunity to provide a submission to the Keri Keri Wind Farm Project – SSD 38358962 located at Loorica Road, Moulamein.

Murray River Council staff have perused information and documents relevant to the project. Whilst Council is overall supportive of the proposals, Council expects the following comments and recommendations to be taken into consideration.

Waste and Resource Recovery

The proponent is to provide a Waste Management Plan that is approved by the Local Authority (Council) and as part of the EIS.

Conditions should be included to the effect of and the Waste Management Plan should detail how the Applicant will:

- (a) minimise the waste generated by the development;
- (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);
- (c) store and handle all waste generated on site in accordance with its classification;
- (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.
- (e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.
- (f) have an agreed Waste Management Plan approved by local council.

In the information perused, Buronga Landfill is nominated as the main disposal location and Mildura for recoverable materials. There is also a statement that all of MRC's waste facilities as "potential" disposal sites. Council confirms that we do not accept the waste types required for disposal.

State Significant Renewable Energy Developments promote that local communities 'receive benefits from the renewable energy projects they're hosting', however the experience of communities and local councils that lie in and around the South West REZ and who are currently hosting renewable developments believe the positive, sustainable impacts the state government is claiming are overstated and that there can be significant, detrimental impacts to the local community by hosting renewable developments.

REZ Development Applications are required to list waste management facilities for development waste that will be generated, however they do not consider the suitability of the waste management centre to accept the proposed waste. Local councils operate small, manageable landfill site for the protected, safe disposal of the local community's rubbish. They are not suitable for managing large scale industrial waste and often are unlicensed which means they legally cannot accept large volumes of waste. Despite this, developers continually attempt to bring large volumes of waste to the small landfills, including oversize items that cannot be managed by the councils. Local waste managers put a blanket ban on accepting any materials from these project sites, only to often have the company ignore council wishes or exploit a loophole, so that one facility or the next must accept it. The developers contact rural landfills outside of the REZ as well, with evidence of requests to regional landfills over 200kms from the REZ boundary to accept renewable development waste. When this waste is taken to the local landfills, the cost to process and transport this waste then falls back on the local community rather than the developers. Additionally, a lot of the waste received at the local facilities is recoverable or recyclable at dedicated recycling facilities, but rural townships do not have these dedicated facilities. Even where sites do accept some of the recoverable streams the volumes are large and often councils have to manage these materials and ultimately transport them elsewhere, which has an additional financial impact on councils and rate payers. Some manufactured items are not recyclable and should go back to the original manufacturer to manage the disposal of, or should be considered as part of an overall renewable energy industry stewardship program. The RAMJO councils support the continuation of these renewable projects in the region, however, there needs to be better waste management provisions with the overall goal of seeking to achieve higher environmental outcomes from the waste produced.

In consultation with councils within our region, local government employees advise of various other challenges around renewable developments, these not only include the disposal of waste materials but extend to lack of connectivity due to the workers camps using the available internet, impact on council's sewer systems, water treatment plants and impacts on roads which deteriorate due to these projects. These items then fall back on the local community and council to fund and repair.

Sewer and Water

Murray River Councils existing water and sewer infrastructure is unable to service a development of this scale. Council requests confirmation of the volume of water required and where it will be sourced prior to any construction to ensure there are no impacts to the community. We also request any upgrades required to Councils assets due to increased demand from the development are fully funded by the development. This would include any impacts from services provided by a third party for example carting water to the development and carting sewer from the development.

Considering there are several developments proposed in the region with the same resource requirements Council requests that the applicant ensures that it has sufficient water for the development, and if necessary, adjust the scale of the development to match its available water supply.

Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.

Roads and Infrastructure

Dilapidation surveys shall be undertaken and agreed as the current condition of all affected sealed roads prior to the commencement of works. Repairing and returning affected roads to pre-works condition (based on the dilapidation survey) at the completion of the construction and commissioning phases of the project. The dilapidation survey will be used at the end of the project as an objective tool to ensure the road is returned to Council in the pre-construction condition. However, waiting until the end of the project to undertake repairs is not practical.

Commitment to maintenance of affected roads both during and post construction works for damage of sealed roads that is deemed to be caused to by the additional development traffic. This would be separate to the dilapidation survey requirement and is for routine maintenance that cannot wait until the end of the project.

Full length gravel resheeting to the selected unsealed sections of the local road network shall be a minimum depth of 100mm and widened in accordance with Table 3.9 of ARRB's Unsealed Roads Best Practice Guide.

All existing culvert and bridge infrastructure shall be assessed along the local road network to determine acceptability of use along the designated route during the detail design phase.

Traffic Generation & Data

The existing project traffic volumes in the TIA only represent the light vehicles and not all the project traffic volume and vehicle types. The TIA and turn warrant assessment (see Figure 3.25 of AGTM Part 6) must be revised to account for all construction traffic volumes and vehicle types for each public and private access to the state road network. The revised turn warrants assessment is required to:

- Apply AM / PM construction traffic volumes (with a ratio of light and heavy vehicles and turning volumes) for the worst-case scenario at each public and private connection.
 - Include background traffic volumes measured at AM/PM network peaks, annual growth rates applied linearly to peak construction and accumulative traffic volumes for project AM/PM peak traffic hours (for overlapping period) of any significant projects (at EIS stage or approved).
 - Include input for turn warrant assessment(s) (i.e. project traffic, turning and background traffic volumes, growth rates, and accumulative traffic volumes). Data must be plotted on turn warrant nominal graphs for each public and private access to the state road network.
- Assess Safe Intersection Sight Distance (SISD) at each existing public and private road intersection with project related new and existing accesses to the local road network. Measures required to achieve SISD are to be provided.
 - The TIA states traffic surveys were undertaken at the intersection of Keri Keri Road and Sturt Highway between 18 and 21 September 2022. This is only a short period of time and is not reflective of various harvest seasons that the construction period will cover, which should be considered. It is also recommended that the raw data to the traffic survey is provided as an appendix.
 - The TIA must be updated to identify the design vehicle (largest heavy and OSOM vehicles) accessing each public and private connection to the state road network.
 - The TIA must be revised to clearly distinguish light and heavy vehicle routes for all project stages and connections to the local road network.

Workforce Accommodation Camp

- Identify timing and sequencing of workforce accommodation camp construction.
- Identify traffic generation and vehicle types for workforce accommodation camp construction during AM / PM peaks.
- Provide a turn warrant assessment for the worst-case scenario of workforce accommodation camp construction and post-completion (entire operation).
- Identify traffic volumes required for pre-construction work that will occur in parallel.
- Assess operational traffic volumes for servicing accommodation camps, vehicle types and AM / PM peak hour changes for traffic generation at each intersection with the local road network along construction transport routes.

Workforce, accommodation, community consultation, developer contributions and cumulative impacts

Council would like to emphasise the critical importance of addressing worker accommodation during the construction phase. It is imperative that detailed plans for temporary worker accommodation are provided, ensuring that these facilities are strategically located to minimise disruption to local communities. This includes implementing robust traffic management and noise reduction strategies to protect the well-being of our residents.

Council insists on stringent measures to mitigate environmental impacts. This encompasses comprehensive waste management protocols, water conservation efforts, and ensuring that worker accommodation does not adversely affect local wildlife or ecosystems. The health and safety of workers must be prioritised, with adequate medical facilities and services, and disease prevention measures in place. Local health services are already under significant pressure, and this project must not place any further burden on them; these services must be provided by the developer.

The ongoing accommodation requirements, once the development has been completed and is operational, also needs to be considered and addressed.

Our communities are currently experiencing a severe shortage of housing; therefore, developers must ensure they organise adequate accommodation for their workers, independent of the current accommodation supply within the community. Council requests the development of and consultation during the creation of an **Accommodation Strategy**.

A **Workforce Development Strategy** is necessary, and Council should be consulted prior to finalisation. The Strategy should focus on training and employing local residents where possible, thereby enhancing local skills and providing long-term economic benefits to the community.

Long-term employment opportunities for local residents should be created, not only during the construction phase but also for ongoing maintenance and operational roles. Developers should engage with and support local businesses by sourcing materials and services locally, where possible. Detailed plans on managing increased traffic and ensuring local infrastructure is not adversely affected are also essential.

Ongoing **community consultation** and transparent communication throughout the project are crucial to address community concerns and keep residents informed.

Council expects developers to negotiate with us regarding **developer contributions**, including the establishment of **Voluntary Planning Agreements**.

Developers must conduct comprehensive assessments of the **cumulative impacts** of their proposals, considering the combined effects with other existing or proposed major projects in the region. This includes evaluating the overall environmental, social, and infrastructure impacts to ensure sustainable development.

Council recognises the potential economic benefits of these projects but stresses the need for a balanced approach. By adhering to these requirements and strategies, it is more likely that the project can be delivered safely, sustainably, and with less impact on our environment and townships.

Council's Planning Team is available to discuss your project and any matters within this submission or relating to this project. We can be contacted on 1300 087 004 and are happy to assist you.

Council looks forward to collaborating with you and the proponent on these important projects.

Yours Faithfully


Sarah Ryan (Feb 7, 2025 18:40 GMT+11)

Sarah Ryan
Acting CEO

Wind Farm - Keri Keri

Final Audit Report

2025-02-07

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