

Baldon Wind Farm

SSD-40138508

Submissions Report



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Document Approvals

The signatures of the people below indicate an understanding in the purpose and content of this document by those signing it. By signing this document you agree to this as the formal Communication Management Plan for the Project.

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EXECUTIVE SUMMARY

Introduction

Baldon Wind Farm Pty Ltd (the Proponent), owned in a joint venture by OMNI Pty Ltd and Goldwind Capital Australia Pty Ltd, is progressing the planning approval for the construction, operation, maintenance and decommissioning of the Baldon Wind Farm (the Project), a renewable energy generation and storage development located between Balranald and Hay, NSW, and within the South West Renewable Energy Zone (REZ).

The Project is situated within the Riverina-Murray region, with the majority of the Project Area located in the Murray River Local Government Area (LGA) and the northern part within the Hay Shire LGA. Part of the Project's eastern boundary also aligns with the western boundary of the Edward River Council LGA. The Project Area comprises two rural properties covering about 46,259 ha.

Since exhibition of the EIS, Project refinements have included removal of five wind turbine generators (WTGs) from the proposed Project design to avoid potential flooding and biodiversity impacts. The refined Project comprises up to 175 wind turbines, with each WTG having approximately 8 MW capacity and a maximum tip height of up to 300 metres. It is likely that the development will be staged with Stage 1 involving 46 turbines and Stage 2 a further 129 turbines.

Combined Stage 1 and 2 would provide approximately 1,400 MW of installed renewable energy capacity of which approximately 1,385 MW could be exported to the National Electricity Market (NEM) after losses are taken into account.

The Project also allows for inclusion of either a centralised or distributed Battery Energy Storage System (BESS) of up to approximately 200MW/400MWh capacity.

The Project is directly aligned with State and Commonwealth government renewable energy generation ambitions and net zero emissions targets.

The Project is considered State Significant Development (SSD) and, accordingly, the Proponent is seeking approval for the Project under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In May 2024, the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) determined the Project to be a “controlled action” and approval is therefore also sought under Section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The approval authority for the Project is the NSW Minister for Planning or the Independent Planning Commission.

In support of the SSD application, an Environmental Impact Statement (EIS) was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI), and publicly exhibited between 14 August 2024 and 10 September 2024.

On 11 September 2024, DPHI requested that Baldon Wind Farm prepare and submit a Submissions Report which responds to the issues raised in the submissions and agency advice, as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).

This Submissions Report has been prepared in response to this request in accordance with clause 59(2) of the EP&A Regulation and having regard to the *State Significant Development Guidelines – Preparing a Submissions Report* (Appendix C of the State Significant Development Guidelines).

Analysis of Submissions

During the public exhibition period, 77 submissions were received from members of the community and community organisations. Advice regarding the Project was received from 16 government agencies and three local Councils.

Responses to agency advice the issues raised in submissions from community and organisations are provided in Section 4.

Of the community and organisation submissions, 13% are from potentially within approximately 20 km of the Project Area, 30% were received from community members or organisations living/based more than 20 km (and less than 100 km) from the Project Area and 57% are from more than 100 km away.

The 10 most frequently raised topics by the community and organisations were:

- The Project:
 - Decommissioning, responsibility for (18 submissions)
- Environmental, social and economic impacts of the Project:
 - Vegetation clearing including TECs, potential cumulative impacts, habitat loss, habitat fragmentation and edge effect. Concerns that proposed offsets are ineffective and wildlife corridors are ineffective for some fauna species (21 submissions)
 - Contamination (of soils, surface waters and groundwater) by BPA or other unspecified WTG contaminant sources (19 submissions)
 - Displacement of primary production (13 submissions)
 - Fauna impacts including construction noise (including night-time work affecting nocturnal fauna), operational noise (infrasound), construction vibrations, increased ground temperatures and water quality impacts (sedimentation) (13 submissions)
 - Waste management at decommissioning, incl BESS (13 submissions)
 - Bird and bat deaths by blade strike, incl potential cumulative impacts (11 submissions)
 - Landscape character impacts (10 submissions)
- Justification and evaluation of the Project:
 - Wind power being an expensive and obsolete technology (16 submissions)
 - The Project won't provide reliable power (due to dependency on wind) (21 submissions)

Responses to the issues raised in submissions from community and organisations are provided in Section 5.

Actions taken since EIS exhibition

Actions taken by Baldon Wind Farm Pty Ltd since EIS exhibition and described in this Submissions Report include:

- Additional engagement and consultation with government agencies, community members and other stakeholders.
- Project design refinements that address matters raised in government agency submissions, outcomes of additional environmental assessment and design review. The Project refinements fit within the limits set by the EIS Project description and do not change the fundamental consent application.
 - Since exhibition of the EIS, Project refinements have included removal of five wind turbine generators (WTGs) from the proposed Project design to avoid potential flooding and biodiversity impacts. The refined Project therefore comprises up to 175 wind turbines with Stage 1 involving 46 turbines and Stage 2 a further 129 turbines.
- Additional assessment of potential environmental and social impacts responds to government agency advice, assesses the proposed Project refinements and increases the level of certainty beyond that presented in the EIS assessment. Additional assessments included:
 - Updated Biodiversity Development Assessment Report (BDAR)
 - Updated Aboriginal Cultural Heritage Assessment Report (ACHAR)

- Potential environmental (biodiversity and cultural heritage) impacts of necessary off-site road upgrades along the proposed OSOM transport route have been assessed.
- A quantitative Flood Assessment
- Updated Over-Size Over-Mass (OSOM) Route Study
- Updated Traffic Impact Assessment (TIA)
- Aviation Obstacle Lighting Plan
- Review and update of the Project mitigation measures provided in the EIS, to address Project refinements, additional commitments made in response to government agency advice, additional assessments completed and review of the EIS mitigation measures. Appendix C provides a list of updated mitigation measures.

Response to Submissions

Government agency advice letters and submissions from Murray River Council, Hay Shire Council and Edward River Council are considered separately to community and organisation submissions and are responded to individually.

In accordance with the *State Significant Development Guidelines – Preparing a Submissions Report* (DPHI, 2024), the content of each community and organisation submission was reviewed and categorised into key issues and a response has been provided to each identified key issue.

Each community and organisation submission was allocated a unique identification number to enable reference to the full submission but also to respect the privacy of submitters. Appendix B includes a table which lists each submission by this identification number and provides a cross-reference to the section of this report where the issues that were raised are addressed.

Project Justification

The environmental assessment undertaken for the Project as part of the EIS and the additional assessment undertaken for the subsequent Project refinements as described in this Submissions Report, has determined that the Project would not result in significant adverse impacts to the environmental, cultural, social and economic values. Any residual impacts can be appropriately controlled with the recommended mitigation measures. Furthermore, the project is consistent with the principles of Ecologically Sustainable Development and the objectives of the EP&A Act.

The Baldon Wind Farm Project would result in numerous benefits, local and regional. The Project addresses local, state and Commonwealth policies that variously aim for a lower emissions future (Net Zero by 2050) using reliable and affordable generation and storage systems of which, renewable energy generation is well placed to deliver on the basis of low emissions, lower priced electricity and suitable available technology that can be deployed more quickly than other options such as nuclear energy.

The environmental values at this site are well understood and the Project:

- Provides important contribution to the State's transition toward a sustainable energy future,
- Responds well to its natural and cultural context, avoiding where possible or minimising impacts, particularly biodiversity and cultural heritage values,
- Includes a specific social impact management framework to mitigate negative social impacts and increase the likelihood of beneficial community outcomes, and
- Includes appropriate contributions to the local economy, through stimulus, Council contributions and benefit sharing initiatives.

The Project is considered justifiable and approvable.

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ABBREVIATIONS

AEP	Annual Exceedance Probability
AHIMS	Aboriginal Heritage Information Management System
ACHAR	Aboriginal Cultural Heritage Assessment Report
BAM	Biodiversity Assessment Method 2020
BBAMP	Bird and Bat Adaptive Management Plan
BC Act	NSW <i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
BOP	Biodiversity Offset Package
BPA	Biphenol A
CEMP	Construction Environmental Management Plan
CCC	Community Consultative Committee
DPHI	NSW Department of Planning, Housing and Infrastructure
DPIE	Former NSW Department of Planning, Industry and Environment (now DPHI)
EIS	Environmental Impact Statement
EEC	Endangered Ecological Community (under NSW TSC Act)
EPA	NSW Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act</i>
EP&A Act	<i>Environmental Planning and Assessment Act</i>
EPL	Environment Protection Licence
FRNSW	Fire and Rescue NSW
GWA	Goldwind Capital (Australia) Pty Ltd
LGA	Local Government Area
LVIA	Landscape and Visual Impact Assessment
MW	Megawatt
NEM	National Electricity Market
OEH	NSW Office of Environment and Heritage
PCT	Plant Community Type
PMF	Probable Maximum Flood
POEO Act	<i>Protection of the Environment Operations Act</i>
POC	Point of Connection
RAMJO	Riverina and Murray Joint Organisation
RFS	NSW Rural Fire Service
SEARs	NSW Planning Secretary's Environmental Assessment Requirements
TEC	Threatened Ecological Community (under EPBC Act)
TfNSW	Transport for New South Wales

TIA	Traffic Impact Assessment
TSC Act	<i>Threatened Species Conservation Act (NSW)</i>
WAL	Water Access Licence
WTG	Wind Turbine Generator

1 INTRODUCTION

1.1 Background

Baldon Wind Farm Pty Ltd (the Proponent), owned in a joint venture by OMNI Pty Ltd and Goldwind Capital Australia Pty Ltd, is progressing the planning approval for the construction, operation, maintenance and decommissioning of the Baldon Wind Farm (the Project), a renewable energy generation and storage development located between Balranald and Hay, NSW, and within the South West Renewable Energy Zone (REZ).

The Project is situated within the Riverina-Murray region, with the majority of the Project Area located in the Murray River Local Government Area (LGA) and the northern part within the Hay Shire LGA. Part of the Project's eastern boundary also abuts the western boundary of the Edward River Council LGA (as shown in Figure 1-1). The Project Area comprises two rural properties (held by two different landowners) and is approximately 38 km north to south and 15 km east to west, covering about 46,259 ha.

Since exhibition of the EIS, Project refinements have included removal of five wind turbine generators (WTGs) from the proposed Project design to avoid flooding and biodiversity impacts. The refined Project comprises up to 175 wind turbines, with each WTG having approximately 8 MW capacity and a maximum tip height of 300 metres. The Project may be installed in two stages:

- Stage 1 would consist of the grid connection works, up to 46 turbines and associated infrastructure, and
- Stage 2 of the Project would include the construction of up to 129 turbines and additional associated infrastructure.

Combined Stage 1 and 2 would provide approximately 1,400 MW of installed renewable energy capacity to the National Electricity Market (NEM).

The Project also allows for inclusion of either a centralised or distributed Battery Energy Storage System (BESS) of up to approximately 200MW/400MWh capacity. The BESS components would optimise the Project by including energy storage when generated power is not required for NEM supply and to supply to the NEM in higher demand periods. Importantly, the BESS operation can assist the operator's management of grid system strength requirements defined by the Australian Energy Market Operator (AEMO).

The Project would include all the associated access, temporary facilities and electrical connection infrastructure which is required construct, operate, maintain, and decommission the Project.

The Project has been designed for an operational lifetime of approximately 35 years, at which point key infrastructure may be refurbished and/or repowered (subject to approvals) or the Project would be decommissioned.

The Project is directly aligned with State and Commonwealth government renewable energy generation ambitions and net zero emissions targets.

The Sturt Highway traverses the northern portion of the Project Area and no infrastructure is proposed to the north of the Highway. The existing Darlington Point-Balranald 220 kV transmission line passes through the central part of the Project area (refer Figure 1-1). The new 330kV 'Project EnergyConnect' transmission line is being constructed adjacent to the existing 220 kV line on the northern side of the existing line. The Project may connect to one or both these transmission lines (or to future transmission upgrades in the region, subject to approval).

The Project is considered State Significant Development (SSD) and, accordingly, the Proponent is seeking approval for the Project under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In May 2024, the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) determined the Project to be a "controlled action" under Section 75 of the *Environment Protection*

and Biodiversity Conservation Act 1999 (EPBC Act). Approval is, therefore, also sought under Section 75 of the EPBC Act. The approval authority for the Project is the NSW Independent Planning Commission and Commonwealth Minister for the Environment and Water.

In support of the SSD application, an Environmental Impact Statement (EIS) was prepared to assess the potential environmental, economic and social impacts associated with the Project. The EIS covered key areas of assessment including landscape and visual amenity, noise and vibration, terrestrial and aquatic biodiversity, Aboriginal and historical heritage, traffic and transport, water and soils, air quality, land resources, hazards and risks, social and economic impacts, waste, greenhouse gas, and cumulative impacts.

The EIS was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI), and publicly exhibited between 14 August 2024 and 10 September 2024. During the exhibition period, government agencies, community members and other stakeholders had the opportunity to provide feedback on the Project to DPHI.

Throughout the consultation process for the EIS and subsequent Response to Submissions process, the Baldon Wind Farm project has consistently received a high level of positive feedback from its stakeholders, including local government representatives, nearby landowners, residents, organisations and businesses. Our project team has engaged regularly and directly with shire councils, presenting comprehensive updates and addressing responses - activating valuable and progressive strategies to benefit the Project and the region.

As part of the EIS social impact assessment, the Project's targeted engagement measured a 72% positive response from local stakeholders. This survey outcome is a testament to the genuine engagement our project team has achieved, which supports us to be continuously alive to the values, attitudes and needs of the community.

1.2 Project key features

Taking into account the proposed Project refinements (Section 3.3), the Project would involve the construction, operation, maintenance and decommissioning of the Baldon Wind Farm in potentially two stages, including the following features. The Project layout following refinements is shown in Figure 1-2 and the Project disturbance footprint is shown in Figure 1-3. Nearby dwellings are shown on Figure 1-4.

- Up to 175 wind turbine generators (WTGs) including:
 - Stage 1 of 46 WTG (capacity 368 MW),
 - Stage 2 of 129 WTG (capacity 1,032 MW).
- Each WTG with a generating capacity of approximately 8 MW and dimensions as follows:
 - A three-blade rotor and nacelle mounted above a tubular steel tower,
 - Maximum tip height of up to 300 metres,
 - Tower (hub) height: in the range from 130 m – 180 m,
 - Blade length in the range from 82 m – 120 m,
 - A crane hardstand and laydown area (approximately 85 m x 70 m).
- A 200 MW / 400 MWh battery energy storage system (BESS) either centralised and located at the grid Point of Connection (POC) or distributed located in reduced numbers at each WTG hardstand
- Electrical infrastructure, including:
 - Up to two central switching stations, one at each of the 220 kV and 330 kV POC,
 - Potentially two primary substations (at 220 kV and 330 kV) may be co-located at switching stations or connected by 220 kV or 330 kV overhead power lines,
 - Up to seven collector substations (intermediate voltages to be confirmed),

- Underground reticulation and/or overhead 33 kV power lines to transmit the electricity generated by the WTGs to the collector substations,
- Approximately 33 km total of internal 220 kV or 330 kV overhead power lines to connect the Project collector substations to the switching station/primary substations at the POC.
- Connection to the National Electricity Grid via any of:
 - The existing 220 kV X5 Balranald to Darlington Point transmission line which passes through the central part of the Project area (POC 52km east of Balranald),
 - The new 330kV 'Project EnergyConnect' transmission line being constructed adjacent to the existing 220 kV line. Although Baldon Wind Farm was unsuccessful with securing Access Rights to the PEC which were awarded in April 2025, there remains potential for a connection to the line in the event that one of the projects that was successful with the initial Access Rights tender is unable to meet the Access Right Project Development Agreement milestones, or if EnergyCo tenders out additional capacity to the REZ following a Headroom Assessment of the operating projects within the REZ as allowed for in the South West REZ Access Scheme Declaration, and/or
 - Future augmentations of the surrounding transmission network, including those identified in the Network Infrastructure Strategy for NSW (May 2023) prepared by EnergyCo on behalf of the NSW Government. Any additional connection works would be subject to the relevant approval.
- Permanent ancillary infrastructure, including:
 - An operation and maintenance facility, including site offices and car park,
 - Up to eight temporary and eight permanent meteorological masts, located close to respective WTG locations with a maximum height of up to 180 metres (hub height),
 - Internal access tracks to, from and in between WTGs and substations (formed width approximately 6 -10 m wide, depending on location and use),
 - Drainage provisions where required, alongside roads and other infrastructure, and
 - Fencing, gates and security provisions.
- Temporary construction facilities including:
 - One construction compound with laydown areas,
 - A temporary workforce accommodation camp sufficient to accommodate the peak construction workforce (up to 400 workers),
 - Concrete batch plants and mobile rock crushing equipment,
 - Establishment of additional groundwater bores and the use of an existing water pipeline along Baldon Road to assist with construction water supply and minimal operational requirements,
 - Stockpile areas (soil and gravel),
 - On-site quarrying of gypsum to assist with road stabilisation, and
 - Gravel borrow pits (if feasible).
- Access upgrades, including:
 - A primary site access, off the Sturt Highway for construction and operational access, and
 - Off-site road upgrades along the proposed Over Size Over Mass (OSOM) transport route from Port of Adelaide.

Prior to the end of the project life (after approximately 35 years of operation) an assessment would be made on the ongoing potential for continuation of the site as a viable renewable energy generation site. While the use may be ongoing, subject to suitable approvals, it is likely that the generating equipment would need to be replaced or subject to retrofit.

Where the initial plant is to be fully decommissioned, all above ground infrastructure would be removed and the areas of disturbance may if not subject to further construction work be rehabilitated, returning the vast majority of the Project Area to its pre-development land capability, for ongoing agricultural or other use.

A detailed Decommissioning plan will be prepared but may contemplate a number of options as would be expected given the substantial time before end of life is reached.

Specific infrastructure may be retained subject to circumstances at the time but may be limited to:

- TransGrid assets, which will be contained within formal subdivision agreements, and
- Any internal access tracks and hardstand areas that the landholders wish to retain.

1.3 Purpose and structure of this report

This report has been prepared by the proponent to provide its responses to submissions received as a result of DPHI's public exhibition and referral processes the EIS.

Submissions received during the public exhibition period included:

- 77 submissions were received from individual members of the community and organisations, and
- Advice regarding the Project was received from 16 government agencies and three local Councils.

On 11 September 2024, DPHI requested that Baldon Wind Farm prepare and submit a Submissions Report which responds to the issues raised in the submissions and agency advice, as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).

This Submissions Report also describes the additional consultation and design response activities undertaken by Baldon Wind Farm since EIS lodgement, including both agency and community engagement activities.

This Submissions Report has been prepared in response to DPHI's request in accordance with clause 59(2) of the EP&A Regulation and having regard to the *State Significant Development Guidelines – Preparing a Submissions Report* (Appendix C of the State Significant Development Guidelines).

Following receipt of this Submissions Report, DPHI will complete its assessment of the Project and prepare an assessment report, taking into consideration the EIS, the Submissions Report and associated additional assessments, as well as submissions made during the public exhibition period. DPHI's assessment report will be considered by the NSW Independent Planning Commission prior to the determination of the Development Application for the Project.

The IPC is the consent authority for SSD applications where:

- The application is not supported by relevant council(s), or
- The NSW Department of Planning, Housing and Infrastructure (DPHI) has received more than 50 unique public objections, or
- The application has been made by a person who has disclosed a reportable political donation.

The IPC is the relevant consent authority for this SSD application as:

- DPHI received over 50 unique public objections, and
- Baldon Wind Farm Pty Ltd has disclosed a small (\$200) reportable political donation to the Liberal Party of Australia (June 2023).

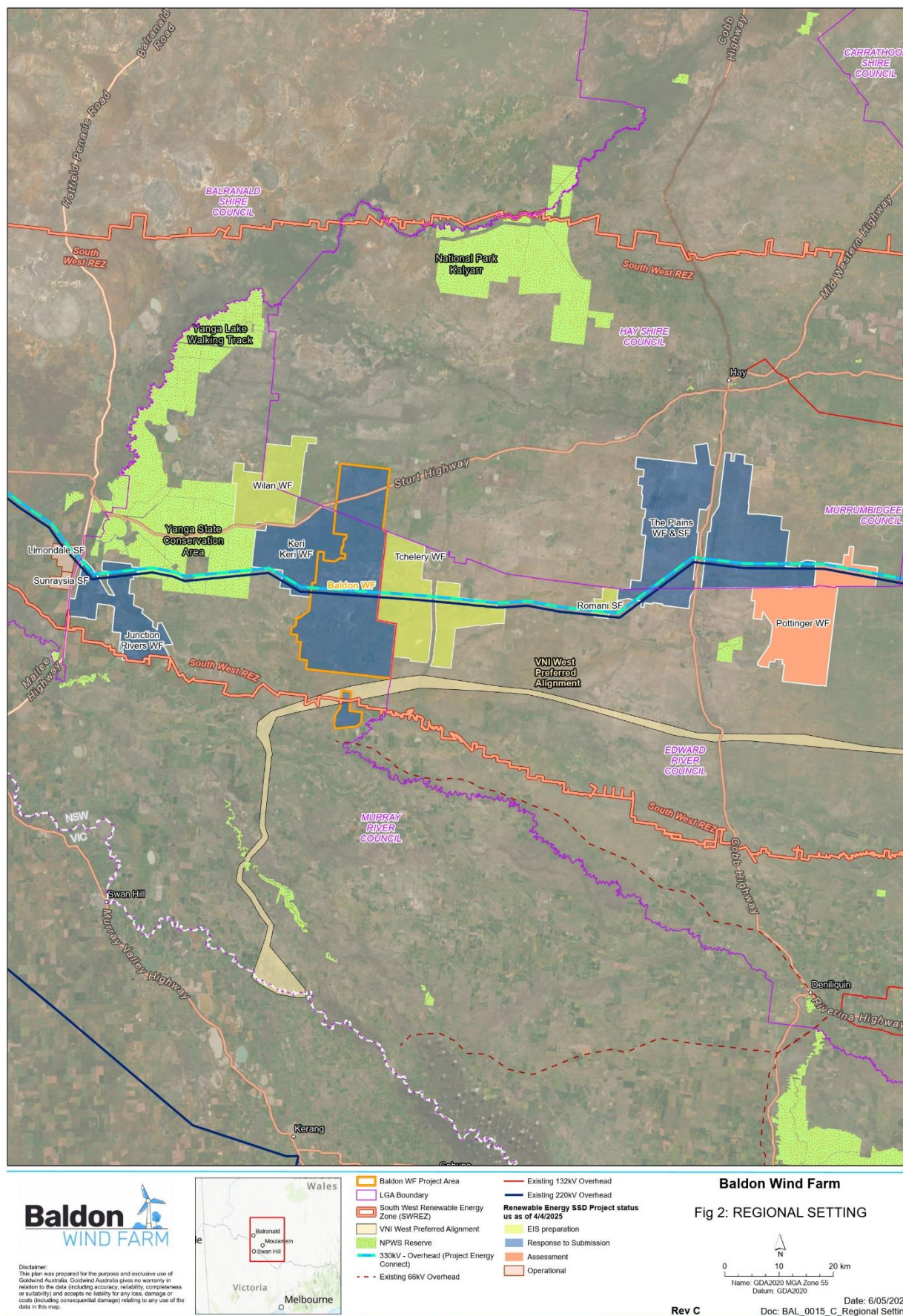


Figure 1-1 Baldon Wind Farm location and regional setting

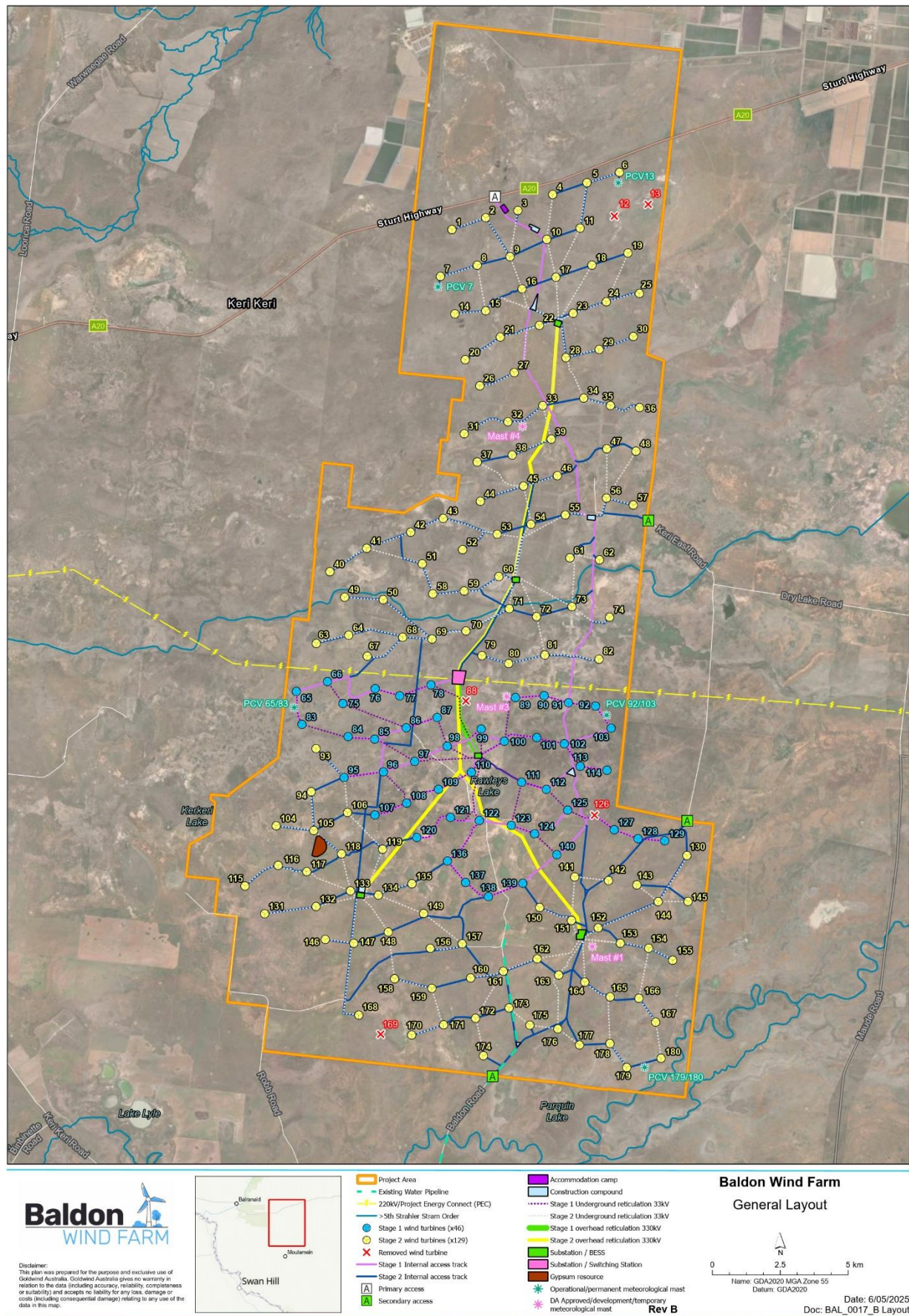
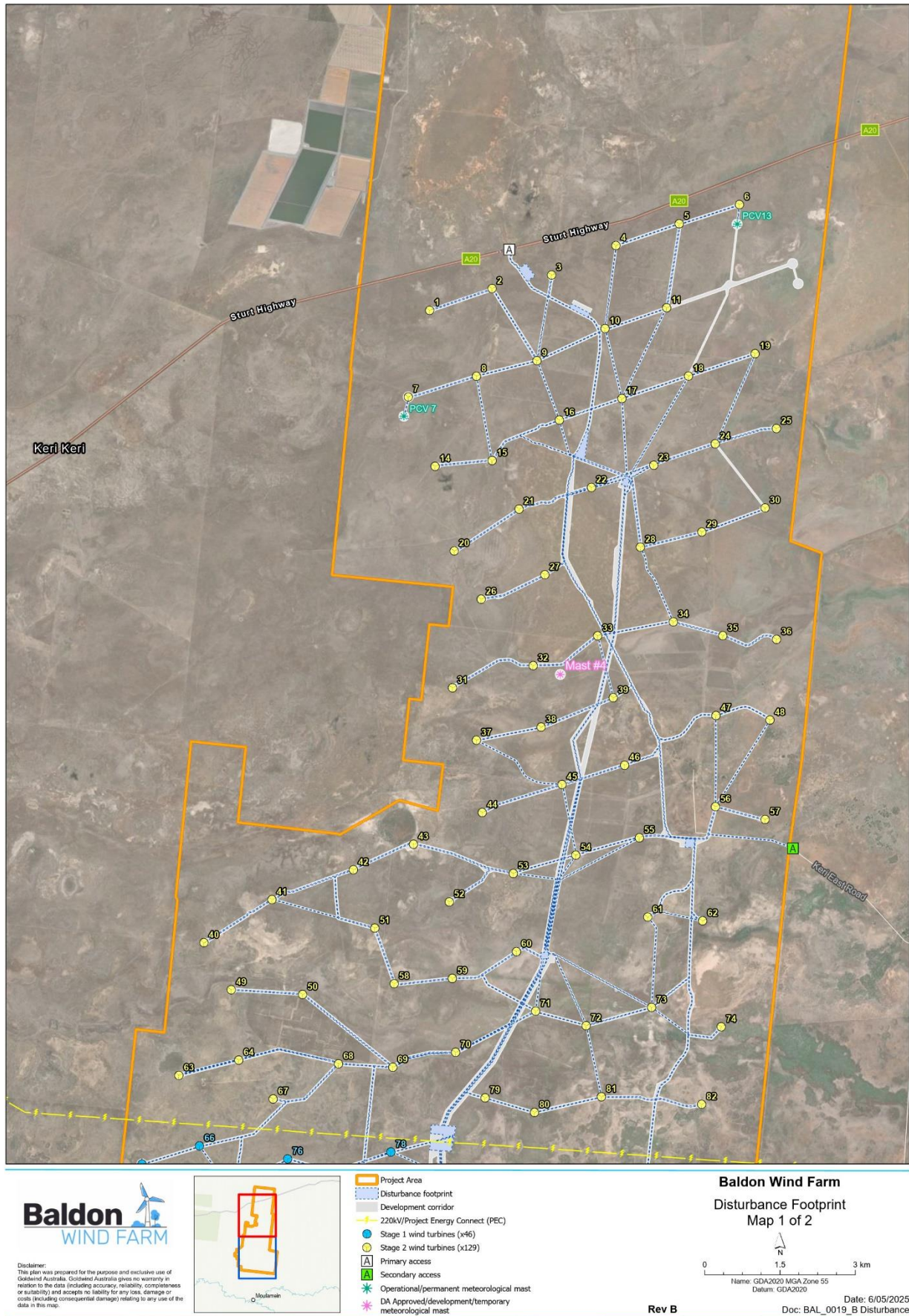


Figure 1-2 Baldon Wind Farm general layout



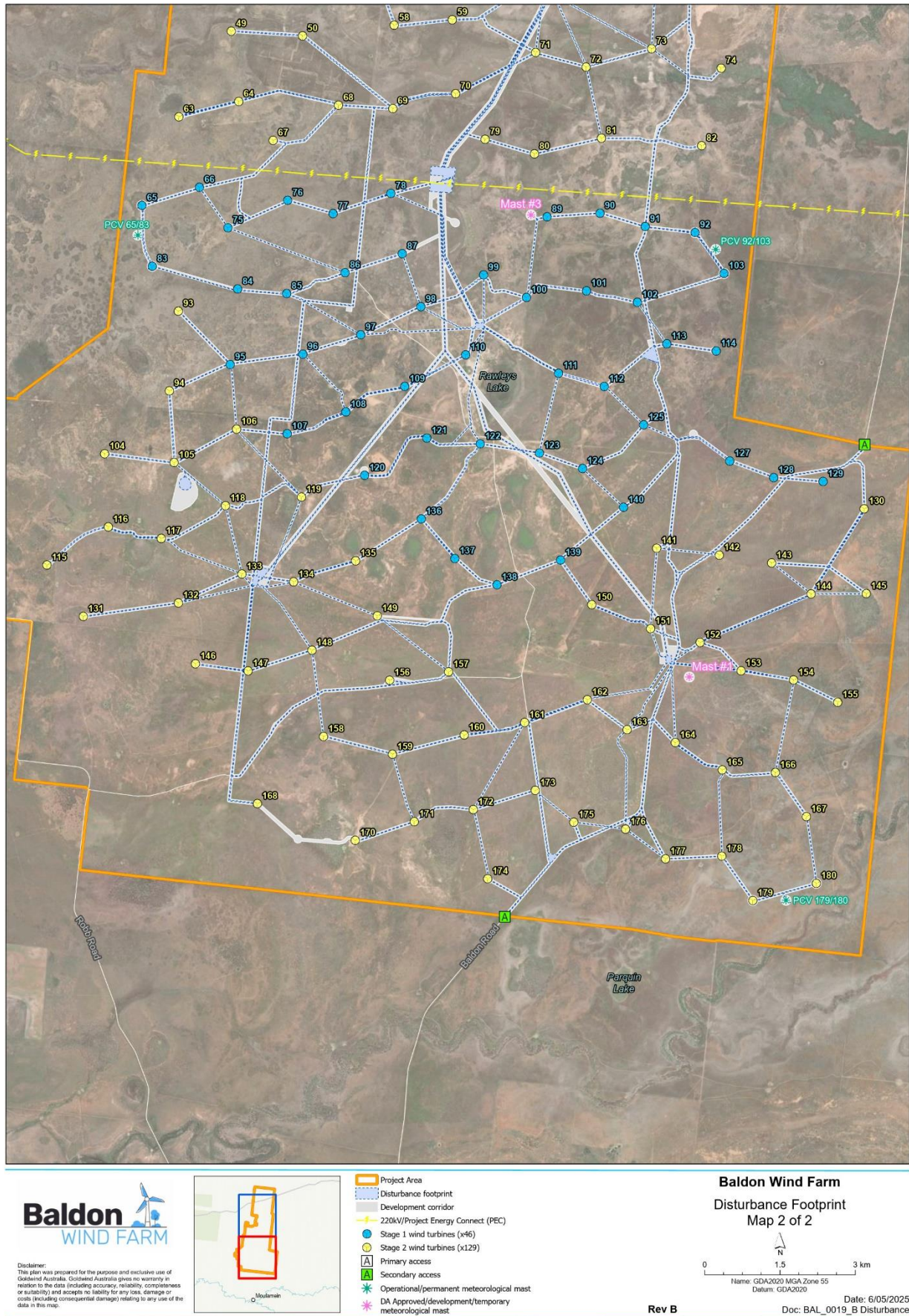


Figure 1-3 Baldon Wind Farm disturbance footprint

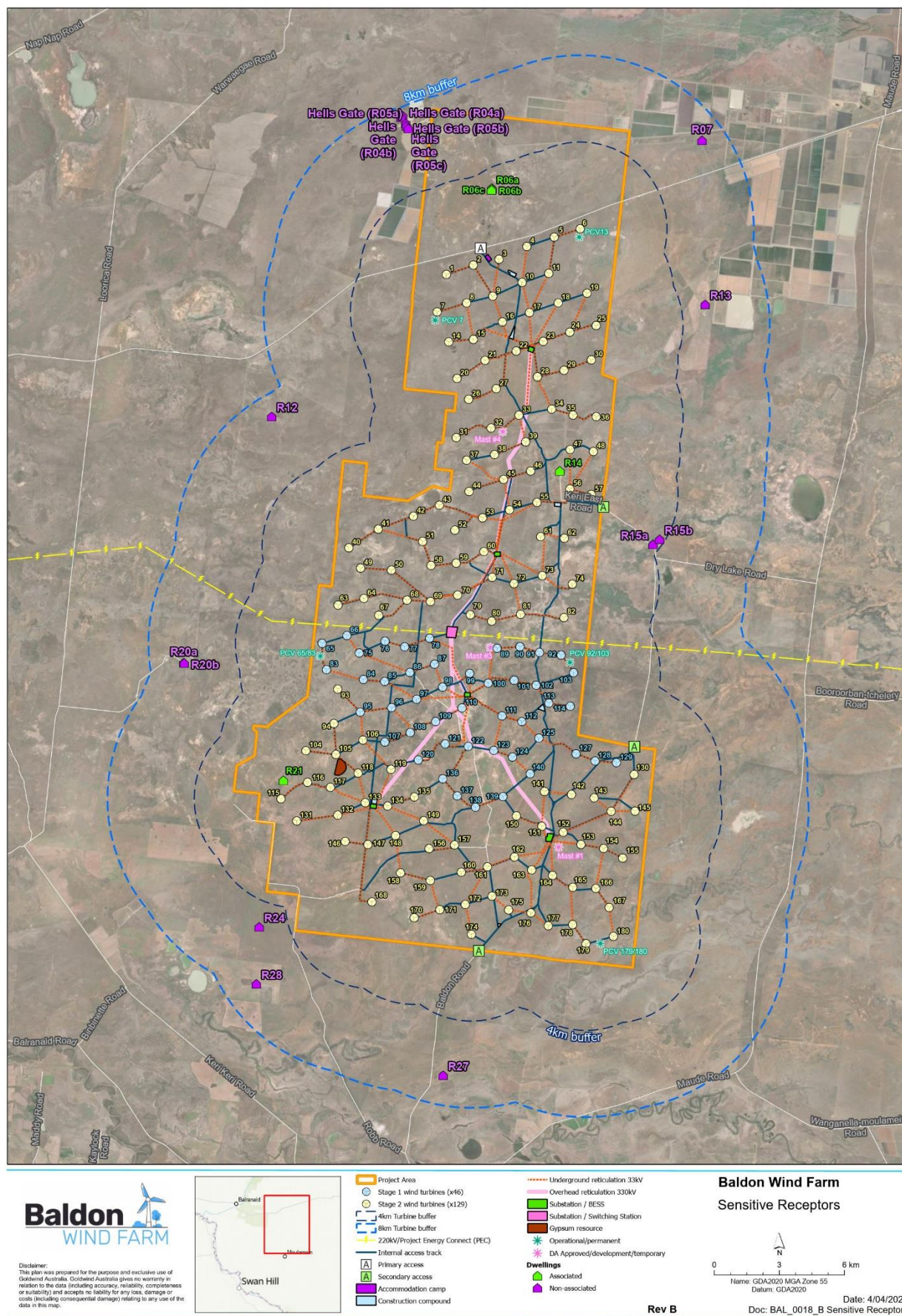


Figure 1-4 Baldon Wind Farm - nearby dwellings

2 ANALYSIS OF SUBMISSIONS

2.1 EIS exhibition and notification details

The EIS was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI), and subsequently publicly exhibited on the DPHI's Major Projects website ([Baldon Wind Farm – DPHI Planning Portal](#)) between 14 August 2024 and 10 September 2024. During the exhibition period, government agencies, community members and other stakeholders had the opportunity to provide feedback on the Project to DPHI.

The Project's earlier public drop-in sessions (May 2024) supplied information to the public and stakeholders with regards to the EIS process, and the 28-day exhibition requirement and its anticipated timing.

During the exhibition period, community stakeholders were also informed of the EIS exhibition via the following means:

- The Baldon Wind Farm website published details about the 28-day exhibition, its timing and forward planning process, and
- 43 key stakeholders were notified by direct email, and nine of the Project's near neighbours were notified by direct phone call.

2.2 Overview of submissions received

DPHI received **Government agency advice** regarding the Project from 16 government agencies and three local Councils. Individual Government agency advice letters are considered separately to community and organisation submissions (refer to Section 2.3). Murray River Council, Hay Shire Council and Edward River Council provided advice by lodging a formal submission with a unique submission ID. These have been classified in this report as agency advice.

Three requests for additional information (RFI) from DPHI (two via the Major Projects Planning Portal on 10 December 2024 and 25 March 2025, and one by email on 2 April 2025) have also been addressed in this submissions report together with responses to agency advice.

Detailed proponent responses to Government agency advice are provided in Chapter 4 and supported by additional technical assessments as applicable.

DPHI received **community and organisation submissions** from 66 individual members of the community and 11 community organisations as summarised in Table 2-1. The organisations that responded are listed in Section 2.4.

The content of each community and organisation submission was reviewed and categorised into 36 key issues (refer to Section 2.4) and a response has been provided in Chapter 5, to each key identified issue..

Each community and organisation submission was allocated a unique identification number. Appendix B (Submissions Register) includes a table which lists each submission by this identification number and provides a cross-reference to the section of this report where the issues that were raised are addressed.

Table 2-1 Overview of submissions received

Submitter	Object	Comment	Support / Comment	Total
Government agency advice	0	16	0	16
Local Council submissions	0	2	1	3
Community submissions	63	2	1	66

Submitter	Object	Comment	Support / Comment	Total
Submissions from organisations	10	1	0	11
DPHI RFI	0	3	0	3
TOTAL	73	24	2	99

2.3 Government agency advice

DPHI received agency advice from 16 government agencies and 3 local Councils during exhibition of the EIS (and additional advice after the close of the exhibition period in the case of Murray River Council).

A request for additional information (RFI) from DPHI (issued via the NSW Planning Portal during December 2024) has also been addressed together with responses to agency advice.

The full list of government agencies and local Councils that provided advice include (in the order in which they are addressed in Chapter 4):

- NSW DPE – Biodiversity, Conservation and Science Group (BCS)
- Heritage NSW – Aboriginal cultural heritage
- Transport for NSW (TfNSW)
- Local Councils:
 - Hay Shire Council
 - Murray River Council
 - Edward River Council
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water
- WaterNSW
- NSW Department of Primary Industries (DPI) – Fisheries
- Civil Aviation Safety Authority (CASA)
- Airservices Australia (Airservices)
- Department of Defence
- Fire and Rescue NSW (FRNSW)
- NSW Rural Fire Service (RFS)
- NSW Department of Primary Industries (DPI) – Agriculture
- NSW Department of Planning, Housing and Infrastructure (DPHI) (request for additional information (RFI))
- NSW Environment Protection Authority (NSW EPA)
- NSW Department of Planning, Housing and Infrastructure (DPHI) – Crown Lands
- NSW National Parks and Wildlife Service
- Mining, Exploration & Geoscience

Copies of agency advice received are available on the DPHI Major Projects website (<https://www.planningportal.nsw.gov.au/major-projects/projects/baldon-wind-farm>).

A summary of the categories of issues raised by agencies is provided in Table 2-2. Government agency advice is responded to in Chapter 4.

Table 2-2 Categories of issues raised by government agencies

Agency	Issue category
Biodiversity, Conservation and Science Group (BCS)	• Biodiversity impacts and the Project Biodiversity Development Assessment Report (BDAR) including Bird and Bat Adaptive Management Plan (BBAMP). • Request for a quantitative flood study.
Heritage NSW	• Aboriginal cultural heritage and the Project Aboriginal Cultural Heritage Assessment Report (ACHAR)
Transport for NSW (TfNSW)	State road network impacts during construction and operation of the Project, as described in the Traffic Impact Assessment (TIA) and Over-Size Over-Mass (OSOM) Route Study, including: • Adequately address Project traffic volumes and types • Suitable design of NSW road upgrades and site access • Clarify OSOM transport route and impacts to the State road network
Hay Shire Council	• Construction traffic – damage to local roads • Traffic – road upgrades proposed by the Project • Decommissioning, scope of • Potential aviation impacts.
Murray River Council	• In-principle support for the Project • Community benefit sharing, developer contributions and Voluntary Planning Agreements • Waste and resource management • Pressure on community infrastructure and services • Construction traffic – damage to local roads • Workforce employment opportunities and development • Workforce accommodation • Community consultation • Potential cumulative environmental, social and infrastructure impacts
Edward River Council	• Biodiversity impacts • Cultural heritage impacts • Visual and landscape impacts • Workforce accommodation and pressure on community resources • Bushfire risk.
DCCEE Water	• Ability to obtain a secure water supply for the Project including necessary licensing • Groundwater dewatering from excavations including necessary licensing • Setbacks from waterfront land

Agency	Issue category
	• Sewage management arrangements
WaterNSW	• Water Access Licencing
DPI Fisheries	• Design and construction of waterway crossings • Riparian buffer zones
Civil Aviation Safety Authority (CASA)	Aviation safety: • Obstacle lighting • Marking of overhead transmission lines and poles • Air route lowest safe altitudes (LSALT) changes
Airservices Australia	Aviation safety: • Aerodrome flight procedures • Air route lowest safe altitudes (LSALT) changes • Communications/Navigation/Surveillance (CNS) Facilities • Air Traffic Control (ATC) Operations • Vertical Obstacle Notification
Department of Defence	• Reporting of tall structures to Airservices Australia
Fire and Rescue NSW	Fire hazard planning: • Fire hazard assessment • Provision of emergency services information • Development of emergency response plans
NSW Rural Fire Service	• Bushfire risk planning and emergency management plans
DPI Agriculture	• Land use conflicts related to the workforce accommodation camp • Agricultural biosecurity management plan
DPHI Planning	• The proposed workforce accommodation camp • Consultation with government agencies • Gypsum extraction and borrow pits: Project description and environmental assessment including potential traffic, flyrock, heritage and visual impacts. • An aviation obstacle lighting Plan, as per Civil Aviation Safety Authority (CASA). • Submission of the biodiversity offset plan.
NSW EPA	• A revised noise and vibration impact assessment pre construction • Waste management
DPHI Crown Lands	• Authorised occupation of Crown lands
NSW National Parks and Wildlife Service	• Did not provide any specific comments that required a Project response

Agency	Issue category
NSW Mining, Exploration and Geoscience	Did not provide any specific comments that required a Project response

2.4 Community and organisation submissions

A total 77 Submissions were received from 66 individual members of the community and 11 community organisations.

Organisations that lodged submissions included two from within 20km of the Project and were otherwise at significant distance from the Project:

- Organisations within approximately 20 km of the Project Area
 - Tchelery Pastoral Co. Pty Ltd – neighbouring property
 - Save Our Surroundings Moulamein
- More distant respondent organisations more than 40 km from the Project Area
 - Yass Landscape Guardians
 - National Rational Energy Network Inc.
 - Save Our Surroundings
 - Save Our Surroundings Barham
 - Save Our Surroundings Riverina
 - Save Our Surroundings Murrumbidgee
 - Rainforest Reserves Australia
 - CWO REZist Inc.
 - BG & amp

These respondents each raised a range of issues, and the content of each submission was reviewed and categorised into 36 key issues with other submissions (for the same issue) from members of the community.

The issues raised by community and organisation submissions are summarised in Table 2-3, including a tally of the number of submissions that have raised the same issue. As most of the community and organisation submissions raised more than one issue, the number of issues identified is greater than the total number of submissions received.

While there were significant similarities in a number of submissions, with some content using the same wording at times, no submissions were considered to be form letters due to minor differences.

In accordance with the *State Significant Development Guidelines – Preparing a Submissions Report* (DPHI, 2024), issues have been categorised into the following five broad groups:

- The Project (e.g. the site, the project area, the physical layout and design, key uses and activities, timing),
- Procedural matters (e.g. level or quality of engagement, compliance with the SEARs, identification of relevant statutory requirements),
- The economic, environmental and social impacts of the Project (e.g. amenity, air, biodiversity, heritage),
- The justification and evaluation of the Project as a whole (e.g. consistency of Project with Government plans, policies or guidelines), and

- Issues that are beyond the scope of the Project (e.g. broader policy issues) or not relevant to the Project.

The five broad issue categories were then divided into 36 themes and sub-themes where relevant to provide greater definition of the issues raised and enable appropriate alignment of any responses.

The 10 most frequently raised issues were:

- The Project:
 - Decommissioning, responsibility for (18 submissions)
- Environmental, social and economic impacts of the Project:
 - Vegetation clearing including Threatened Ecological Communities (TECs), potential cumulative impacts, habitat loss, habitat fragmentation and edge effect. Concerns that proposed offsets are ineffective and wildlife corridors are ineffective for some fauna species (21 submissions)
 - Contamination (of soils, surface waters and groundwater) by BiPhenol A (BPA) or other unspecified WTG contaminant sources (19 submissions)
 - Displacement of primary production (13 submissions)
 - Fauna impacts including construction noise (including night-time work affecting nocturnal fauna), operational noise (infrasound), construction vibrations, increased ground temperatures and water quality impacts (sedimentation) (13 submissions)
 - Waste management at decommissioning, incl BESS (13 submissions)
 - Bird and bat deaths by blade strike, incl potential cumulative impacts (11 submissions)
 - Landscape character impacts (10 submissions)
- Justification and evaluation of the Project:
 - Wind power being an expensive and obsolete technology (16 submissions)
 - The Project won't provide reliable power (due to dependency on wind) (21 submissions)

In addition to the summary of issues raised by community and organisation submissions listed in Table 2-3, the most frequently raised issues (which received five or more submissions) are graphically illustrated in Figure 2-1. The analysis shows that the nature of issues raised is broad but primarily in the category of environmental, social and economic impacts of the Project.

A response has been provided to each identified key issue in Chapter 5.

Table 2-3 Summary of issues raised by community and organisation submissions

Key issue and sub-issue	Submissions
The Project	21
Decommissioning, responsibility for	18
Question about grid connection point and transmission capacity	3
Supports the Project	1
Procedural matters	12

Key issue and sub-issue	Submissions
Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	6
Inadequate consultation and community views were ignored	4
Community submissions are often distorted by personal grievances, unverified and do not view the proposal rationally	1
Modern Slavery concerns about the proponent	1
Environmental, social and economic impacts of the Project	146
Vegetation clearing including TECs, potential cumulative impacts, habitat loss, habitat fragmentation and edge effect. Concerns that proposed offsets are ineffective and wildlife corridors are ineffective for some fauna species	21
Contamination (of soils, surface waters and groundwater) by BPA or other unspecified WTG contaminant sources	19
Displacement of primary production	13
Fauna impacts including construction noise (including night-time work affecting nocturnal fauna), operational noise (infrasound), construction vibrations, increased ground temperatures and water quality impacts (sedimentation)	13
Waste management at decommissioning, including BESS	13
Bird and bat deaths by blade strike, incl potential cumulative impacts	11
Landscape character impacts	10
Embodied energy, including mined minerals, means wind farms are a high environmental impact	9
Noise and vibration - amenity and health impacts, including cumulative impacts	9
Construction traffic impacts	6
Turbine fires, risk of bushfire and emergency response to bushfire, including Aerial firefighting will be restricted in and adjacent to the project area.	6
Fire risk related to BESS	3
Wind farms provide limited employment opportunities	3
Aviation risks and aviation study is inadequate	2
Visual impacts including cumulative impacts	2
Workforce accommodation and community impacts to Moulamein	2
Aquatic impacts - sedimentation affecting local waterways and the Murray River	1
Contamination from BESS	1
Embodied energy - BESS	1
The Project should not be granted water access rights	1
Justification and evaluation of the Project	44
Wind power being an expensive and obsolete technology	16

Key issue and sub-issue	Submissions
The Project won't provide reliable power (due to dependency on wind)	21
Wind farms are not economically viable without subsidies	6
The Project won't address climate change.	1
Beyond the scope of the Project or not relevant to the Project	17
Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat	5
Objects to the NSW Government's Energy Strategy and Climate Change Policy	5
Additional transmission lines to connect wind farms are unnecessary environmental impact	4
Establishment of the REZ, and questions about the total intended capacity	2
Australia's export of mining resources contributes to CO2 emissions	1
Total	241

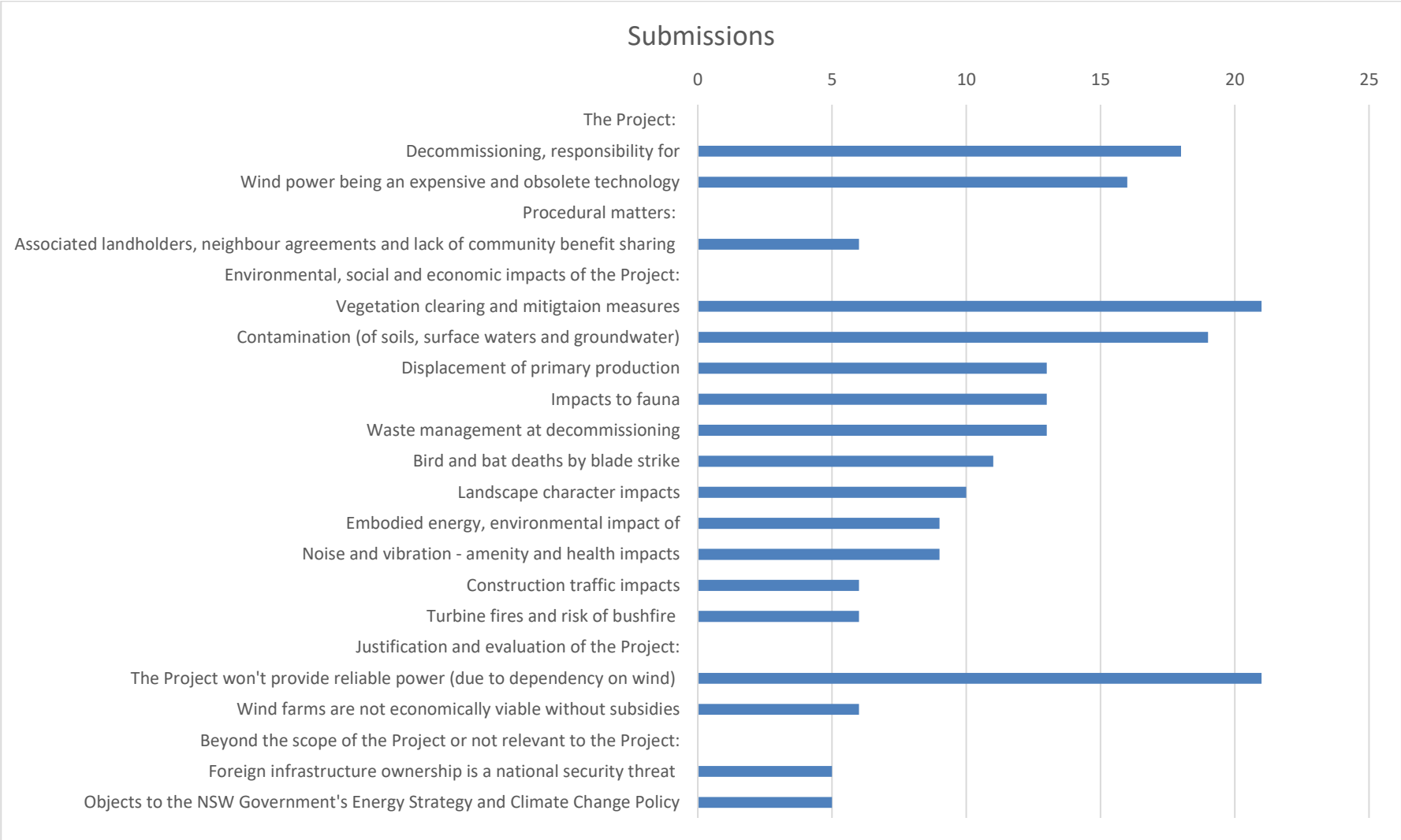


Figure 2-1 Issues raised by community and organisation submissions

The graph shows the most frequently raised issues (which received five or more submissions). Other issues raised are listed in Table 2-3..

2.4.1 Quantification of geography of community and organisation submissions

Review of the 77 community and organisation submissions showed the following geographic distribution (refer Figure 2-2):

- 10 submissions (13% of total submissions) are from potentially within approximately 20 km of the Project Area and include:
 - One submission by an organisation (Tchelery Pastoral Co. Pty Ltd) identified themselves as a neighbouring property occupant. Their submission made comment but did not object to the Project.
 - Two organisation submissions and seven community submissions were identified as residing in the town of Moulamein NSW. One community submission was received from the Mallan NSW locality (approximately 15 km west of Moulamein and 20 km south-west of the Project Area).
- 23 (30%) of submissions were received from community members or organisations living/based more than 20 km (and less than 100 km) from the Project Area.
 - The nearest of these came from Kyalite NSW (1 submission) and Swan Hill Victoria (7 submissions), approximately 45 km west and 55 km south-west from the Project Area respectively.
- 44 (57%) of submissions were received from community members or organisations living/based more than 100 km away (refer Figure 2-2).

Distribution of the 77 submission source locations by local government areas (LGAs) or State (refer Figure 2-3) was observed as follows:

- 22 submissions (29% of total submissions) came from within the LGAs of Murray River Council, Hay Shire Council or Balranald Shire Council (Figure 2-3). None were received from within the Edward River Council LGA.
- 30 submissions (39%) came from other NSW LGAs, and
- 25 submissions (32%) were received from other States (Victoria, Queensland and Tasmania).

This geographic analysis of submissions is limited by the resolution of the public submissions' records, which records the township, State and Council area of each submission but not address. Nevertheless, the information is sufficient to indicate the general relationship to the project area.

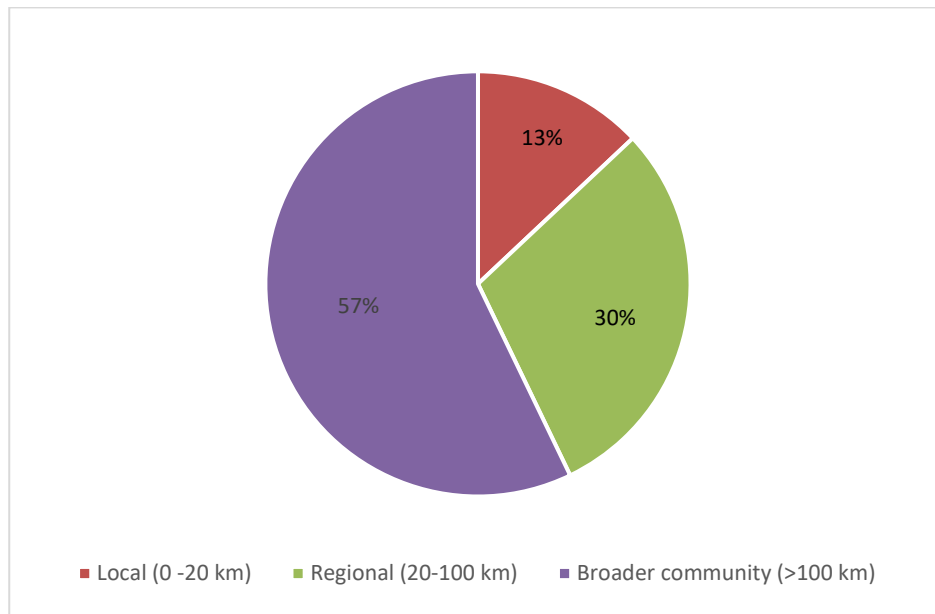


Figure 2-2 Community and organisation submissions by geography – distance from Project Area

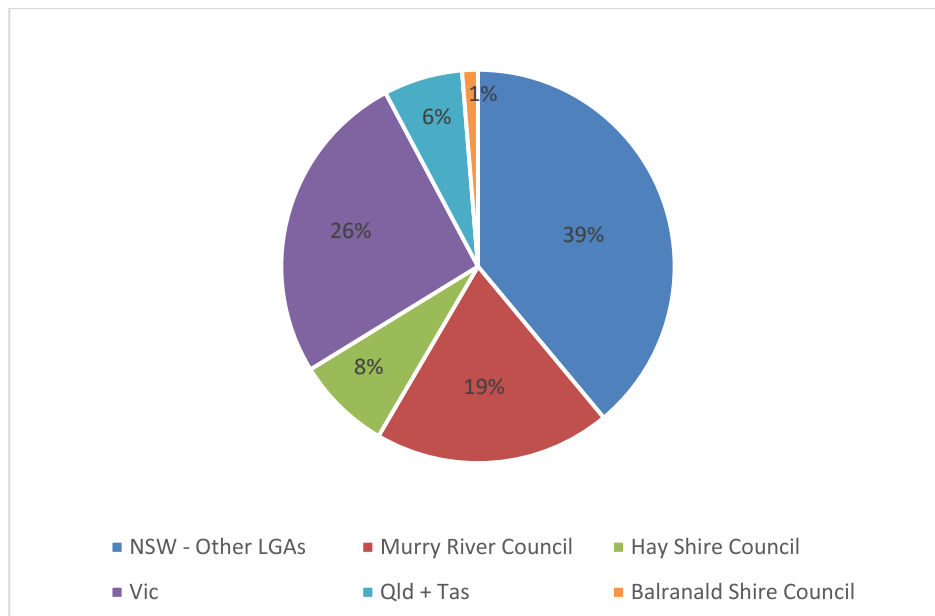


Figure 2-3 Community and organisation submissions by geography – State and LGA

The nature of issues raised by submissions considering geography is summarised in Table 2-4. The analysis shows that the nature of issues raised is broad across all geographies. However, a few trends are evident:

- Contamination (of soils, surface waters and groundwater) by BPA or other unspecified WTG contaminant sources was the most frequently raised issue within the local and regional geographies,
- Potential direct and indirect impacts to fauna was the next most frequently raised issue by submissions from within the local area, and
- Submissions from further afield (more than 100 km from the Project Area) carried more concern about the details of the Project (technology type and responsibility for decommissioning) and justification and evaluation of the Project (energy reliability).

Table 2-4 Nature of issues raised in the context of distance from the Project Area

Geography / Distance from the project	Most frequently expressed issue(s)
Within approximately 20 km of the Project Area (10 submissions)	• Contamination (of soils, surface waters and groundwater) by BPA or other unspecified WTG contaminant sources (4 submissions) • Fauna impacts including construction noise (including night-time work affecting nocturnal fauna), operational noise (infrasound), construction vibrations, increased ground temperatures and water quality impacts (sedimentation) (2 submissions) • 11 other issues received 1 submission each.
Within the LGAs of Murray River Council, Hay Shire Council and Balranald Shire Council (22 submissions)	• Contamination (of soils, surface waters and groundwater) by BPA or other unspecified WTG contaminant sources (9 submissions) • Fauna impacts including construction noise (including night-time work affecting nocturnal fauna), operational noise (infrasound), construction vibrations, increased ground temperatures and water quality impacts (sedimentation) (5 submissions) • Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing (4 submissions) • Embodied energy, including mined minerals, means wind farms are a high environmental impact (4 submissions) • 16 other issues received 1, 2 or 3 submission each.
More than 20 km (and less than 100 km) from the Project Area (30% of submissions (23 submissions))	• Contamination (of soils, surface waters and groundwater) by BPA or other unspecified WTG contaminant sources (7 submissions) • Landscape character impacts (5 submissions) • Vegetation clearing including TECs, potential cumulative impacts, habitat loss, habitat fragmentation and edge effect. Concerns that proposed offsets are ineffective and wildlife corridors are ineffective for some fauna species (5 submissions) • Waste management at decommissioning, including BESS (5 submissions) • Fauna impacts including construction noise (including night-time work affecting nocturnal fauna), operational noise (infrasound), construction vibrations, increased ground temperatures and water quality impacts (sedimentation) (4 submissions) • Decommissioning, responsibility for (4 submissions)

Geography / Distance from the project	Most frequently expressed issue(s)
	• Embodied energy, incl. mined minerals, means wind farms are a high environmental impact (4 submissions) • 14 other issues received 1, 2 or 3 submissions each.
More than 100 km away from the Project Area (57% of submissions (44 submissions))	• The Project won't provide reliable power (due to dependency on wind) (19 submissions) • Vegetation clearing including TECs, potential cumulative impacts, habitat loss, habitat fragmentation and edge effect. Concerns that proposed offsets are ineffective and wildlife corridors are ineffective for some fauna species (15 submissions) • Wind power being an expensive and obsolete technology (14 submissions) • Decommissioning, responsibility for (14 submissions) • 29 other issues received 9 or less submissions each.

3 ACTIONS TAKEN SINCE EIS EXHIBITION

3.1 Overview of Actions Taken since the EIS Exhibition

The proponent has undertaken a range of post-exhibition activities relevant to the development application process. The actions undertaken since the exhibition are summarised below and described in Sections 3.2 to 3.5:

- Undertaken Government agency engagement and further reviews as necessary (Section 3.2)
- Undertaken engagement with community and other stakeholders (Section 3.2)
- Undertaken further review of the Project design and integrated refinements to the design for various purposes, primarily with reduction in the Project's environmental impact (Section 3.3)
- Arranged and implemented additional assessments with information gained included in this Submissions Report (Section 3.4)
- Reviewed and updated the Project mitigation measures (Section 3.5 and Table 3-2).

3.2 Government agency and community engagement post-exhibition of the EIS

The EIS was publicly exhibited between 14 August 2024 and 10 September 2024 on DPHI's Major Projects website ([Baldon Wind Farm – DPHI Planning Portal](#)). In addition, DPHI informed relevant government agencies that the Baldon Wind Farm EIS was available for review and comment.

Since the EIS public exhibition period and during preparation of this Submissions Report, Baldon Wind Farm has carried out consultation with government agencies, community members and other stakeholders to ensure that their submissions are well understood and best responded to. The consultation activities carried out are outlined in Table 3-1 and engagement records are included in Appendix D.

This community and stakeholder engagement is additional to that carried out during the preparation of the EIS and which was described in the EIS.

Table 3-1 Post-EIS government agency and community engagement – summary

Appendix	Agency /stakeholder	Engagement method and date	Matters discussed
Government Agencies			
C.01	Department of Planning Infrastructure and Heritage (DPHI)	12 November 2024 (Teams meeting)	Timeframes for responses to agencies. Proposed Project changes. Route options and road upgrades. BCS requirements and surveys.
N/A	Balranald Shire Council (BSC)	15 November 2024 (In-person meeting during public info drop-in session)	General council update. Water management system. Community benefit funds and including access and housing initiatives
C.02	Transport for NSW	27 November 2024 (Teams meeting)	Peak traffic for accommodation options. Preconstruction activities. Site access. Powerline heights. OSOM rest areas and swept paths. Landowner consents.
C.03	Biodiversity Conservation and Science	4 December 2024 (Teams meeting)	Development of draft Bird & Bat Adaptive Management Plan (BBAMP). Updates to BDAR to address BCS comments, including mapping.

Appendix	Agency /stakeholder	Engagement method and date	Matters discussed
			Supplementary surveys. Updates to TEC assessment and MNES.
C.04	NSW Rural Fire Service	6 December 2024 (Teams meeting)	Overview of project including BESS technology. Fire risks and mitigations. Further engagement at detailed design stage. Bushfire Emergency Management Operations Plan to be developed with detailed design approval
C.05	Fire and Rescue NSW	11 December 2024 (Phone call and email)	Agreed that the FRNSW recommendations outlined in their submission can be considered post-approval. Further consultation with FRNSW to occur post-approval.
C.06	Heritage NSW	19 December 2024 (Teams meeting)	Clarifications around Heritage NSW submission and presentation of proposed response strategy, including attendance by NGH heritage consultants.
C.07	Department of Climate Change, Energy, the Environment and Water (Federal)	16 January 2025 (In-person and Teams meeting)	Plains Wanderer habitat and mitigation measures. Avoidance and minimisation of impacts. Migratory species. Plains Wanderer research project.
C.09	NSW Department of Climate Change, Energy, the Environment and Water (Water)	17 January 2025 (Teams meeting)	Waterfront land and water crossings. Hydrology and geomorphic impacts to waterways
N/A	Balranald Shire Council (BSC)	19 February 2025 (Phone call)	Waste management, waste disposal options across shire and council's capacity regarding housing/accommodation
C.10	Hay Shire Council (HSC)	23 January 2025 (In-person meeting)	Project update. HSC responses aviation obstacle lighting; Shire renewables initiatives; BESS opportunities; waste management; housing/accommodation initiatives
C.11	Department of Planning Infrastructure and Heritage (DPHI)	28 February 2025	TfNSW submission and response strategy, BCS submission (biodiversity) response strategy, Overview of progress on Submissions Report, Agency consultation completed, Project refinements, Additional assessments
	Energy Corporation of NSW (EnergyCo)	13 February 2025 Several follow-up conversations	Requested clarification on the proposed SWREZ road upgrades (especially Cnr Market St and McCabe St Balranald)
C.12	Hay Shire Council (HSC)	7 March 2025 Email	Enquiry by Baldon Wind Farm regarding potable water supply for the Project, and Council response.

Appendix	Agency /stakeholder	Engagement method and date	Matters discussed
	Hay Shire Council (HSC)	25 March 2025 In-person meeting	Update on project status and response to queries submitted especially: - Community BESS opportunities - Accommodation camp planning in Hay
	Hay Shire Council (HSC)	25 April 2025 Phone call	Project update SW REZ and Stage One Grid Connection Application on track to access to existing 220kV transmission line
	Murray River Council (MRC)	27 March 2025 In-person meeting	Met with Executive and Planning teams to provide an update on the Project including BWF's responses to the Submission received by MRC; VPA and s.138 next steps.
	Balranald Shire Council	26 March 2025 In-person meeting	Update on project status and request for clarification on Road Owner Consent required at proposed road upgrades (Euston and Balranald). BESS initiatives; critical services.
	Balranald Shire Council	15 April 2025 In-person meeting	Met with Shire Councillors incl Mayor, Deputy Mayor and GM. Discussed: Project update; Project Transportation Route; Shire's potential for project accommodation. Local supply chain and healthcare resources. BESS initiatives for shire; disaster and critical event management and resources
	Balranald Shire Council	15 April 2025 In-person meeting	Met with Shire Economic Development Manager. Discussed: Project Update; Jobs/Training and Skills development through project activity; BESS initiatives with support through Shire's upcoming funding allocations and grants. Shire wide issues including business development and support for small businesses and tourism industry.
	Balranald Shire Council	16 April 2025 In-person meeting	Met with Balranald Shire Council - General Manager, Director of Infrastructure and Planning, and Shire's Planning and Engineering teams. Discussed Project proposed transportation route; community benefits; council assets and roads and future developments.
C.15	NSW State Emergency Service	Email 26 March 2025	Baldon Wind Farm invited NSW SES for consultation regarding the Project flood study, proposed mitigations and emergency management. NSW SES responded indicating that they prefer to arrange any consultation via DPHI (the Submissions Report process). A final

Appendix	Agency /stakeholder	Engagement method and date	Matters discussed
			copy of the Project flood study is provided in Appendix G.
Community			
C.13	Public information drop-in sessions Balranald Shire; Hay Shire and Murray River Council areas. Drop-in session locations: BSC: Visitor Information Centre precinct, and Market Street Balranald. MRC: Moulamein Art Gallery, Morago Street precinct, Moulamein. HSC: Lachlan Street precinct, Hay.	14-15 November 2024 In-person meetings	The team conducted conversations and recorded feedback from 40 people, including representatives from local government, government agencies as well as community members. The sessions were supported with Project maps; FAQ documents/fact sheets; survey forms - while names and contact details of people that were interested in further updates were recorded for the project's database. Balranald: Topics discussed included local job creation and training; decommissioning of windfarm and recycling; water management; local housing issues across region; cultural heritage surveys and local First Nations stakeholders. Spoke to local business owners regarding potential supply chain needs of project and construction phase and local accommodation providers. Murray River Council: Engagement focused on local volunteerism and community benefits including use of local services; support for schools and aged care centres including improvements to local infrastructure that supports the community. Discussion points also included local accommodation and hospitality providers. Hay Shire Council: Key points raised included community benefits; project legacy; political aspects including the power market/prices; cultural heritage and decommissioning of windfarm. Focused discussions also on Indigenous stakeholders, local history, attitudes and Hay's Aboriginal culture; local schools and potential engagement for project through youth/students. Discussions also ranged from local business community job creation and local training; project's waste management; small business support through project; local housing issues across region; and local NFP groups.

Appendix	Agency /stakeholder	Engagement method and date	Matters discussed
	Website update and issue of newsletter	15 December 2024	Update of project issued through published newsletter issued to stakeholder database and posted on Baldon Wind Farm website
	Hay Local Aboriginal Corporation and Nari Nari Tribal Council	18 January 2025 In-person meeting	General update on project and discussion regarding current community issues; with explanation of progress of project and benefits of project across project phases.
	Hay Local Aboriginal Corporation and Nari Nari Tribal Council	25 March 2025 In-person meeting	Project update and BESS initiatives; power reliability for remote and rural communities; community benefits
	Hay Local Aboriginal Corporation and Nari Nari Tribal Council	29 April 2025 Phone call	Project update: topics included SW REZ and Stage One Grid Connection Application
	Wamba Wamba Aboriginal Corporation	29 April 2025 Phone call	Project update: topics included SW REZ and Stage One Grid Connection Application
	Moulamein community	18 January 2025 In-person meeting	Targeted discussions at local gallery regarding update on community issues and seeking information for BWF to plan benefits and community funding across Project phases,
	Key stakeholder meeting in Murray River Council area	27 March 2025 In-person meeting	Met with local community influencer with regards to shire activities, projects and issues to support the planning of community benefits.

3.3 Project refinements

The Project as described in this Submissions Report remains generally as described in the EIS but has been refined to further reduce environmental impacts. The refinements have been made in response to matters raised in government agency submissions, outcomes of additional environmental assessment and the proponent's design review.

The Project refinements fit within the limits set by the EIS Project description and do not change the fundamental development consent application. The Project refinements include the following aspects, which are shown on Figure 3-1.

- Removal of three turbines and relocation of one meteorological mast to avoid high flood hazard areas:
 - Remove WTGs 12, 13 and 88 (and the access tracks and electrical reticulation to them),
 - Relocate one met mast approximately 1.8 km north-west accordingly (from near WTG 13 to near WTG 6),
 - Remove southern access track to the Project switching station,
 - Relocate electrical reticulation route between WTG 78 and WTG 99, and
 - Relocate electrical reticulation to WTG 95.

- Removal of two turbines and removal or relocation of access tracks and electrical reticulation to avoid impact to biodiversity values:
 - Remove WTG 169 (and the access track and electrical reticulation between WTG 168 and WTG 170) – due to nearby Little Eagle nest, to reduce collision risk and avoid habitat (Black Box Woodland and hollow bearing tree) removal and fragmentation.
 - Remove WTG 126 (while maintaining the access track and electrical reticulation passing by that location) – due to nearby Wedge-tailed Eagle nests, to reduce collision risk.
 - Remove electrical reticulation between WTG 24 and WTG 30 (extend electrical reticulation along the access track from WTG 29 to WTG 30 instead) – to avoid several key populations of Mossiel Daisy (*Brachyscome papillosa*).
 - Relocate access track between WTG 177 and WTG 178 - to avoid Slender Darling Pea (*Swainsona murrayana*) records.
 - Remove access track between WTG 83 and WTG 84 – to avoid habitat impacts and minimise habitat fragmentation in the vicinity of Plains-wanderer sighting locations.
 - Relocate electrical reticulation to WTG 149 to follow access track alignment – also to avoid habitat impacts and minimise habitat fragmentation in the vicinity of Plains-wanderer sighting locations.
- Removal of the five turbines as noted above (WTGs 12, 13, 88, 126 and 169) and nominating three turbines (WTGs 95, 138 and 139) for Stage 1 rather than Stage 2, results in a total of 175 turbines and the following Project staging:
 - Stage 1: 46 turbines (capacity 368 MW),
 - Stage 2: 129 turbines (capacity 1,032 MW).
- Extend electrical reticulation between WTG 156 and WTG 157 and relocate electrical reticulation to WTG 138 based on design review.
- Up to 12 x battery cabinets at each of selected WTG hardstands (approximately 4.4 MW/ 8.9 MWh per turbine) in the case of a distributed BESS: The total Project BESS capacity would remain unchanged at not more than 200 MW/ 400 MWh. This change simply allows for larger distributed BESS at fewer WTGs compared with the EIS assumption for 3 x battery cabinets (1.1 MW / 2.2 MWh) at each selected WTG.

There would be no change to the key conclusions of the Preliminary Hazard Analysis (PHA) (Appendix F.8 of the EIS) given the key determining factors do not change:

- Spacing between battery cabinets is unchanged from EIS assessment,
- The increased footprint of each distributed BESS (approx. 238 m², inclusive of service access requirements) is easily available on each WTG hardstand (approx. 5,950 m²),
- The distance to on-site and off-site receptors doesn't change (the BESS remain in the same locations / on WTG hardstands) but overall less sites where BESS needs to be managed.
- Reduction of proposed transport routes. The Over-Size Over-Mass (OSOM) transport route has been simplified (partly to address TfNSW's submission (refer Section 4.3)).
 - The previously proposed transport routes from the Port of Newcastle to the Project Area (as proposed in the EIS) are now removed from the current application.
 - The previously proposed transport routes from the Port of Adelaide to the Project Area have been reduced from four route options to one (refer to Figure 3-2) (with the exception of an alternative high-load route for approximately 210 km between Port of Adelaide and Moorook South, SA).

- There is no change to the Project site access, it remains as direct from Sturt Highway.
- Aviation obstacle lighting on a select number of wind turbines is proposed to be installed (and operated if required) for aviation safety purposes. This Project refinement was made in response to CASA's submission (Section 4.10) and does not change the visual impact assessment which had already considered turbine lighting.

A complete Project description taking into account these Project refinements can be found at Section 1.2.



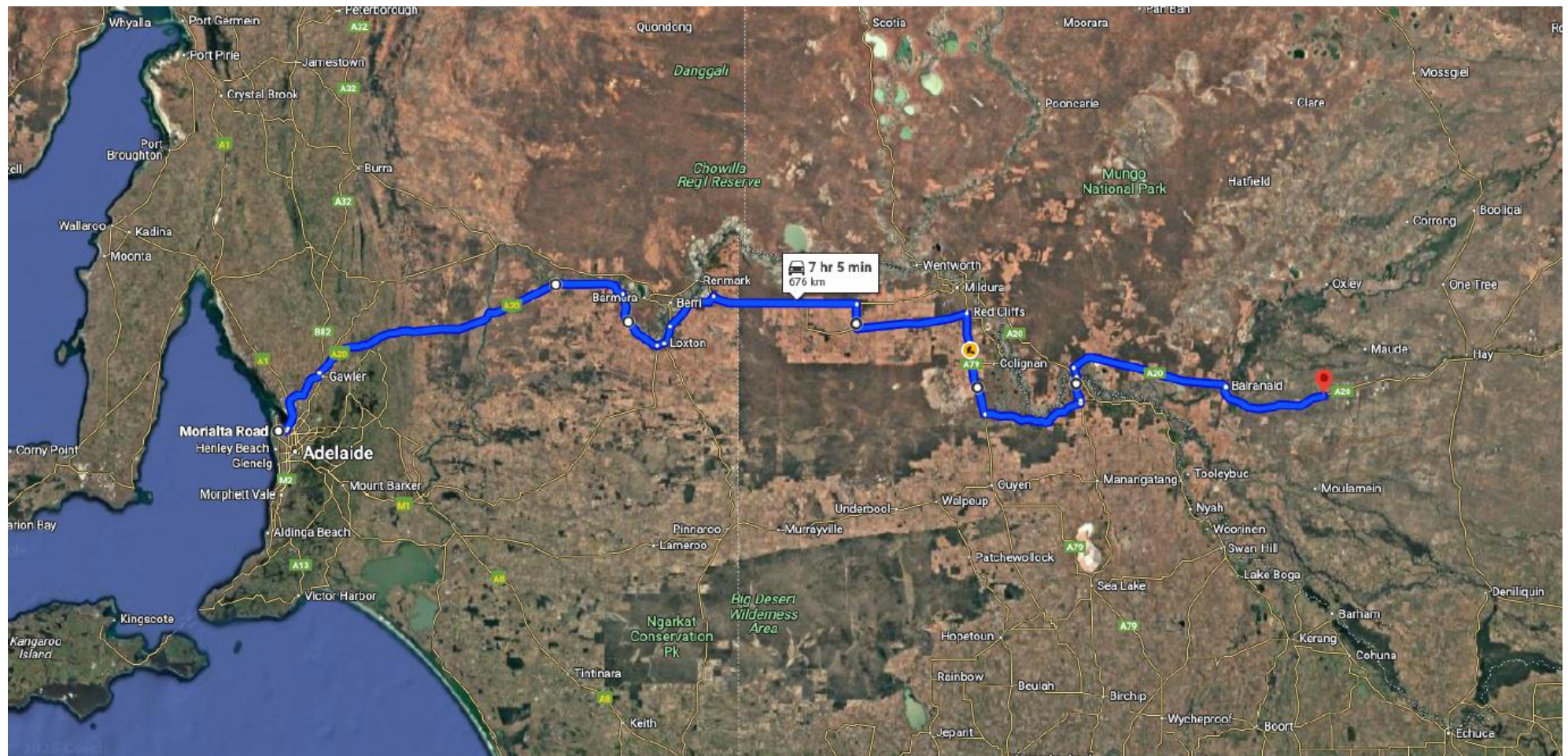


Figure 3-2 Primary Project transport route – Port Adelaide to Project Area

3.4 Additional assessments

The following additional technical assessments have been completed as part of preparation of this Submissions Report:

- Updated **Biodiversity Development Assessment Report (BDAR)** (Appendix E) responding to BCS advice (Section 4.1) and reflecting Project refinements (Section 3.3) (avoidance of biodiversity values and high flood hazard areas). The comprehensive updated BDAR also includes additional bird and bat utilisation survey (BBUS) data, additional threatened species surveys and a draft Bird and Bat Adaptive Management Plan (BBAMP).
- Updated **Aboriginal Cultural Heritage Assessment Report (ACHAR)** (Appendix E) responding to Heritage NSW advice (Section 4.2) and reflecting Project refinements (Section 3.3).
- Potential environmental (biodiversity and cultural heritage) impacts of necessary **off-site road upgrades along the proposed OSOM transport route** have been assessed. OSOM route options were identified in the EIS and subsequently following the exhibition, the OSOM route options were simplified (refer Section 3.3) and potential environmental impacts have been assessed – refer to the Updated BDAR (Appendix E) and Addendum ACHAR (Appendix G). The assessments have assisted the preparation of the response to TfNSW advice (Section 4.3).
 - The updated BDAR identified the following potential impacts related to the NSW off-site road upgrades:
 - 0.17 ha of PCT 164 *Cotton Bush open shrubland of the semi-arid (warm) zone* along the site entrance on Sturt Highway,
 - 0.16 ha of PCT 153 *Black Bluebush low open shrubland of the alluvial plains and sandplains of the arid and semi-arid zones* at the Euston intersection upgrade,
 - 0.18 ha of exotic vegetation at the Balranald intersection upgrade, and
 - Two threatened flora species, Bindweed (*Convolvulus tedmoorei*) and Slender Darling Pea (*Swainsona murrayana*) were unable to be surveyed for at the site access intersection and both have been assumed present in 0.17 ha of roadside vegetation.
 - The Addendum ACHAR found no known Aboriginal objects within the proposed NSW road upgrade areas (all of which were assessed to have negligible potential for subsurface cultural deposits), and therefore further investigation for Aboriginal heritage is not recommended for these areas.
- A quantitative **Flood Assessment** (Appendix G) responding to BCS advice (Section 4.1). The Flood Assessment reviews the revised Project layout after removal or relocation of turbines to avoid high flood hazard areas (refer to Project refinements Section 3.3).
- Updated **Over-Size Over-Mass (OSOM) Route Study** (Appendix H) responding to TfNSW advice (Section 4.3) and Project refinements (Section 3.3) (reduction of proposed transport routes).
- Updated **Traffic Impact Assessment (TIA)** (Appendix I) responding to TfNSW advice (Section 4.3).
- **Aviation Obstacle Lighting Plan** (Appendix J) responding to CASA advice (Section 4.10) and Project refinements (Section 3.3) (aviation obstacle lighting).

3.5 Updated mitigation measures

The Project mitigation measures provided in Appendix C of the EIS have been updated to address:

- Project refinements (refer to Section 3.3) which include additional commitments made in response to government agency advice,

- Additional assessments completed (refer to Section 3.4), and
- General/editorial review of the EIS mitigation measures.

Updated mitigation measures are listed in Table 3-2. Updates are shown by ~~striketrough~~ and ***bold italics*** text. An updated consolidated list of all Project mitigation measures is provided in Appendix C.

Table 3-2 Updated mitigation measures

ID	Updated Mitigation measure(s)	Project Stage	Reason for update
B1	Detailed design will: - Ensure turbine locations will be micrositied around Little Eagle (<i>Hieraaetus morphnoides</i>) and Wedge Tail Eagle (<i>Aquila audax</i>) nests identified in the BDAR to provide a minimum 300 m 100m buffer from turbines. Consider dismantling nests to avoid long term collision risks where these occur within 100m of a wind turbine. - Ensure no dams will be removed to minimise impacts to Southern Bell Frog (<i>Litoria raniformis</i>). Utilise existing survey data for Mosgiel Daisy (<i>Brachyscome papillosa</i>) and Chariot Wheels (<i>Mairena cheelii</i>) to minimise footprint in areas of core habitat, such as micrositing for cabling routes or reducing track width.	Design / pre-construction	To reflect the recommendations from additional assessments (updated BDAR) (refer to Section 3.4) and address advice from BCS (refer to Table 4-1) including increased avoidance of biodiversity values. These changes strengthen the mitigation measure. Also an editorial update to clarify the original intended application of the mitigation measure.
B2	An adaptive Biodiversity Management Plan (BMP) will be developed with input from BCD and DCCEE prior to commencement of the action. Measures will include all mitigation measures established in the BDAR, including but not limited to the following: Fauna management, including: - Staged clearing procedures for hollow bearing trees, - Relocation of habitat features, - Vehicle hygiene, movement and parking protocols, - Southern Bell Frog mitigation, - Preclearing surveys and protocols for Plains-wanderer nesting breeding sites, and Bindweed (<i>Convolvulus tedmoorei</i>) and Austral Pillwort (<i>Pilularia novae-hollandiae</i>)	Pre-construction / construction	To reflect additional assessments (biodiversity surveys) already completed since the EIS (refer to Section 3.4) and address advice from BCS (refer to Table 4-1). These changes strengthen the mitigation measure. Also editorial updates to clarify the original intended application of the mitigation measure.

ID	Updated Mitigation measure(s)	Project Stage	Reason for update
	Trenching protocols to minimise fauna impacts. Vegetation management, including: - Rehabilitation protocols with consideration to native revegetation requirements, - Weed, pest animal and pathogen management, and - Staff training requirements with respect to understanding the sites sensitive environmental features		
B3	Finalise, in consultation with BCS, and implement the A Bird and Bat Adaptive Management Plan (BBAMP) will be developed in consultation with BCD. This will consider the full data set of the Project's bird and bat utilisation surveys as well as include a more comprehensive assessment of cumulative impacts, informed by quantitative information where available for relevant surrounding projects. Collision risk modelling may be appropriate where sufficient data is available, with triggers to ensure that mitigation is appropriate to the modelled risk.	Pre-construction and Construction	To reflect additional assessments (draft BBAMP) already completed (refer to Section 3.4 and Appendix E).
B5	Undertake a survey to confirm absence and/or avoidance of Bindweed (<i>Convolvulus tedmoorei</i>) in site access upgrade footprint along Sturt Highway.	Prior to construction	To reflect additional assessments (biodiversity surveys and updated BDAR) already completed since the EIS (refer to Section 3.4).
B6	Implement the Southern Bell Frog Adaptive Management Plan.	Construction	Additional mitigation measure to reflect the recommendations from additional assessments (updated BDAR) (refer to Section 3.4) and address advice from BCS (refer to Table 4-1)
AH1	All sites identified in the Project area must be managed in accordance with the site specific mitigation and management recommendations provided in the site impacts table included in Appendix D of the Archaeological Technical Report (Appendix F of the updated ACHA report.	Construction	Editorial: Updated to clarify the original intended application of the mitigation measure

ID	Updated Mitigation measure(s)	Project Stage	Reason for update
AH3	Specific micro siting recommendations and further assessment stipulated in the ACHA must be implemented during detailed design, not limited to: • Buffer zones to protect BWF – 24 and BWF – 195, <i>as well as any others that need to be fenced or avoided once detailed design is confirmed.</i> • The gypsum extraction works area (a lower sensitivity area has been defined). • <i>A program of subsurface test excavation for areas of PAD and Mounds that are unable to be avoided by ground disturbing works (specific locations to be confirmed post final design and prior to construction).</i> • Installation of overhead cabling (specific locations have been identified in the ACHA).	Prior to construction	Clarifications to strengthen the mitigation measure.
V3	The following night lighting design principles will be implemented <i>for ancillary infrastructure (including switching stations, collector substations and facilities buildings)</i>: 1. Control the level of lighting: • Only use lighting for areas that require lighting i.e. paths, building entry points • Switch off lighting when not required • Consider the use of sensors to activate lighting and timers to switch off lighting 2. Lighting Design: • Use the lowest intensity required for the job • Use energy efficient bulbs and warm colours • Direct light downwards • Ensure lights are not directed at reflective surfaces • Use non-reflective dark coloured surfaces to reduce reflection of lighting • Keep lights close to the ground and / or directed downwards • Use light shield fittings to avoid light spill	Operation	Editorial: Updated to clarify the original intended application of the mitigation measure (from Section 12.5 of the EIS Landscape and Visual Impact Assessment).

ID	Updated Mitigation measure(s)	Project Stage	Reason for update
V4	Access roads will be designed and constructed to have reduced residual visual impacts by applying the following mitigations: - Where possible utilise or upgrade existing roads, trails or tracks to provide access to the proposed turbines to reduce the need for new roads - Allow for the provision for downsizing roads or restoring roads to existing condition following construction where possible - Any new roads must minimise cut and fill and avoid minimise the loss of vegetation.	Construction and Operation	Editorial: Vegetation loss associated with clearing for Project access roads has been assessed in the EIS. Mitigation measure updated accordingly and to match original intent.
SE4	... Goldwind Baldon Wind Farm Pty Ltd intends to invest \$1,100 per MW / annum to fund Community Benefit programs over the life of the Project (indexed to CPI) commencing from the time the Project becomes operational. The Community Benefits Sharing Plan would consider benefits at both the local and regional scales...	Pre-construction, Construction and Operation	Editorial: Updated to correct name of the Proponent and clarify the original intended application of the mitigation measure.
T3	Implement road upgrades (and obtain relevant approvals) where required to facilitate OSOM transport vehicles successfully accessing the site from the Ports of Adelaide or Newcastle.	Pre/during construction (prior to OSOM component delivery)	To reflect Project refinements (refer to Section 3.3).
T4	Three identified secondary access points would only be used in the event of emergency, except for the southern secondary access point on Baldon Road which may be used by workers and local material deliveries (no major component deliveries) travelling to/from Moulamein (estimated up to 10 light vehicles per day). The southern secondary access point on Baldon Road may be used by up to 10 light vehicles per day travelling to/from Moulamein. All other vehicles associated with the Project construction, operation and for decommissioning will enter and exit the Project area via the designated primary site access location off the Sturt Highway.	Construction and Operation	Editorial: Updated to clarify and strengthen the original intended application of the mitigation measure.

ID	Updated Mitigation measure(s)	Project Stage	Reason for update
H	H1 – H7	-	Editorial: Correct duplicate H1 and update consecutive numbering for Hydrology mitigation measures.
H3	A detailed Hydrological and Hydraulic Assessment Report will be completed prior to construction in consultation with Council, BCD and DPHI, to verify that local hydrology would be maintained and that hydraulic impacts would be minimal. This work will inform the final civil design and works methods. Detailed design will consider the results of the completed Flood Study, including the incorporation of any design refinements into updated modelling as necessary, to ensure hydrology and flooding outcomes remain suitable. Key considerations include: Access roads would be constructed as close to natural ground levels as possible so as not to form an to avoid or minimise obstruction to floodwaters or changes to local hydrology. - Waterway vehicle crossings preferably bed level crossings, constructed flush with the bed of the watercourse on first and second order watercourses to minimise hydraulic impacts. - Buildings and structures (including wind turbines) located outside high flood hazard areas (H5 and above) where they may be vulnerable to structural damage and have significant impact on flood behaviour.	Pre-construction	To reflect additional assessments already completed (refer to Section 3.4) and also to reflect realistic design considerations (access road immunity) and clarify the original intended application of the mitigation measure.
H5	A Floodsafe Plan be prepared for the development to ensure the safety of employees during flood events in general accordance with the NSW SES “Business Floodsafe Toolkit and Plan”.	Construction Operation	Editorial: H5 consolidated with H7.
H7	An Emergency Response Plan incorporating a Flood Response Plan would be prepared in consultation with relevant Councils and the NSW SES prior to construction covering all phases of the proposal. The plan would: ... Be prepared in general accordance with the NSW SES “Business Floodsafe Toolkit and Plan”	Construction Operation Pre-construction	To reflect the recommendations from additional assessments (refer to Section 3.4) and address advice from BCS (refer to Table 4-1).

ID	Updated Mitigation measure(s)	Project Stage	Reason for update
AV2	The rotor blades, nacelle and the supporting towers of the wind turbines will be white. No additional marking measures or obstacle lighting are required for wind turbines. Aviation obstacle lighting will be installed on a select number of wind turbines (and operated if required) for aviation safety purposes. The lighting will be fully shielded from the view of any dwelling within 2 km in accordance with CASA regulations (Part 139 (Aerodromes) Manual of Standards 2019), unless otherwise agreed with associated landholders.	Design	To reflect Project refinements (refer to Section 3.3) (include aviation obstacle lighting).

4 RESPONSE TO AGENCY SUBMISSIONS

This chapter provides responses to issues raised in the advice received from:

- 16 government agencies,
- Three local Councils, and
- Three request for information (RFI) received from DPHI.

The approach to processing and responding to government agency advice is outlined in Chapter 2.

The full list of government agencies and local Councils that provided advice (listed in the order in which they are addressed in this chapter) can be found at Section 2.3.

Key issues raised by each agency have been summarised and responded to in the following sections.

4.1 Biodiversity, Conservation and Science Group (BCS)

The Biodiversity, Conservation and Science Group (BCS) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) provided a number of comments and recommendations which are summarised and addressed in Table 4-1 and Table 4-2. The nature of the issues raised by BCS are primarily related to:

- Biodiversity impacts and the Project Biodiversity Development Assessment Report (BDAR), and
- Request for a quantitative flood study.

Baldon Wind Farm and NGH ecology consultants also met with BCS to discuss these matters on 4 December 2024 and records of the meeting agenda are provided in Appendix D. The responses below are shaped by those discussions and have included provision with this Submissions Report, of:

- An updated BDAR prepared by NGH (Appendix E), and
- A Flood Study provided by BMT (Appendix G).

Specific responses addressing BCS comments and recommendations are provided in Table 4-1 and Table 4-2.

Table 4-1 Responses to BCS advice – Flood risk management

Comments or issues raised by BCS	Proponent Response
1.1. The EIS needs to map the following features relevant to flooding as described in the <i>Flood Risk Management Manual 2023</i> (DPE 2023), including: a) Flood Prone Land. b) Flood Planning area, the area below the flood planning level. c) Hydraulic categorisation (floodways and flood storages). d) Flood hazard.	Relevant flood maps addressing BCS request are provided in Annexes of the Hydrology and Flooding Assessment report (Appendix G).
1.2. The EIS needs to describe flood assessment and modelling completed to determine the design flood levels for events. This needs to include a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP flood levels and the probable maximum flood, or an equivalent extreme event.	Flood assessment approach is described in Section 2 of the Hydrology and Flooding Assessment report (Appendix G). In summary, the flood assessment has been undertaken in accordance with Australian Rainfall and Runoff 2019 (ARR 2019) data and methodology to establish existing (baseline) and post-development flood behaviour for the Project site. Events assessed include the 5% AEP, 1% AEP, 0.5% AEP, 0.2% AEP and PMF for the local catchment, along with breakout of the 0.05% AEP for the regional (Murrumbidgee) catchment.

Comments or issues raised by BCS	Proponent Response
1.3. The EIS needs to model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios: a) Current flood behaviour for a range of design events. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.	Flood impacts have been estimated for the 5% AEP, 1% AEP and PMF events, in addition to the 0.5% AEP and 0.2% AEP events as proxies for climate change (refer Section 2 of the Hydrology and Flooding Assessment report (Appendix G)).
1.4. Modelling in the EIS needs to consider and document: a) Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies. b) The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood. c) Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazards and hydraulic categories. d) Related provisions of the NSW <i>Flood Risk Management Manual</i> (DPE 2023).	a) Although there is no Council flood study which covers the same geographical extent as that included in the Hydrology and Flooding Assessment for this Project (Appendix G), the study is consistent with council study (Hay and Maude Flood Study - 2023) in their use of data and modelling approaches. b) Flood impacts have been estimated for all requested design storm events, refer to Section 3 of the Hydrology and Flooding Assessment report (Appendix G). Any changes to flood extents, velocities, levels, hazards and hydraulic categories are highlighted in baseline and developed scenario maps and discussed in Section 3. In summary, no off-site impacts are observed due to inclusion of the proposed development in all events. c) In all events, no off-site impacts are observed due to inclusion of the proposed development. Additionally, the impacts within the site are considered non-detrimental to the proposed WTGs and developments. d) All related provisions in the NSW <i>Flood Risk Management Manual</i> (DPE 2023) have been considered in this assessment.
1.5. The EIS needs to assess the impacts on the proposed development on flood behaviour, including: a) Whether there will be detrimental increases in the potential flood affection of other properties, assets and infrastructure. b) Consistency with Council Flood/Floodplain Risk Management Plans. c) Consistency with any Rural Floodplain Management Plans. d) Compatibility with the flood hazard of the land. e) Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land. f) Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site. g) Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of riverbanks or watercourses. h) Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the State Emergency Services (SES) and Council. i) Whether the proposal incorporates specific measures to manage risk to life from flood. These	a) The proposal does not result in detrimental increases to flood affection of other properties as discussed in Section 3 of the Hydrology and Flooding Assessment report (Appendix G). b) There are no Council Floodplain Risk Management Plans in the study area. c) There are no Rural Floodplain Management Plans in the study area. d) Flood hazards and their extents are considered generally compatible with the proposal as indicated in mapping provided. In summary, the proposed developments and WTGs are located in low hazard areas (up to H3) for events from the 5% to 0.2% AEP, with a few WTGs in high hazard areas (up to H4) along Abercrombie Creek during the PMF event (refer to Section 3.4 of the Hydrology and Flooding Assessment report (Appendix G)). No significant changes to hazard are expected within or outside the site, as shown by the pre- and post-hazard maps. e) Hydraulic functions and their extents are considered generally compatible with the proposal as indicated in mapping provided. In summary, the site consists of Flood Storage and Flood Fringe categories due to slow-moving water in the catchment. No significant changes to flood function are expected as a result of the proposal, as shown by the pre- and post-flood function maps. f) The proposal does not result in detrimental increases to flood affection outside the site as discussed in Section 3.2 of the Hydrology and Flooding Assessment report (Appendix G).

Comments or issues raised by BCS	Proponent Response
matters are to be discussed with the SES and Council. j) Emergency management, evacuation and access, and contingency measures for the development considering the full range of flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the SES. k) Any impacts the development may have on the social and economic costs to the community as consequence of flooding.	g) Given the relatively low flood velocities across the site (and that these are not expected to change), no increases to erosion, siltation, or bank instability are expected. h) Existing community emergency management arrangements are not impacted by the proposal as discussed in Section 3.8 of the Hydrology and Flooding Assessment report (Appendix G). Consultation with Councils and NSW SES have commenced (refer to Section 3.2 and Appendix D) and will continue during preparation of the site Emergency Response Plan. i) Recommended emergency management measures are discussed in Section 3.8 of the Hydrology and Flooding Assessment report (Appendix G). j) As above. k) Based on the non-detrimental nature of estimated impacts, no social or economic impacts are expected as a consequence of flooding.

Table 4-2 Responses to BCS advice – Biodiversity

Comments or issues raised by BCS	Proponent Response
A Bird and Bat Adaptive Management Plan (BBAMP) based on sufficient survey data and documenting commitments to monitor, mitigate and offset residual impacts to avifauna needs to be provided. A draft Bird and Bat Adaptive Management Plan needs to be prepared.	Draft BBAMP prepared (refer Appendix J.1 of the updated BDAR (Appendix E)) and summarised in Section 9.2.1 of the updated BDAR.
Additional Bird and Bat Utilisation Survey (BBUS) effort is required so that the BBUS can be used to reliably inform the draft BBAMP.	Bird and Bat Utilisation surveys completed to cover two years of data, including at height data for bats. Bat Surveys have now been completed in Autumn, Winter, Spring 2023, Summer, Autumn, Winter, Spring 2024 & Summer 2025. Bird Surveys have now been completed in Summer, Autumn, Winter, Spring 2023 & Summer, Autumn, Winter, Spring 2024. Results of the field surveys are summarised in Sections 4.1.3, 6.1.5 and 8.3.4 of the updated BDAR (Appendix E). Reports are provided in Appendix J of the updated BDAR.
The BDAR requires additional information to demonstrate that impacts have been avoided and minimised, including to SAI entities. The BDAR needs to include more detail to demonstrate that biodiversity impacts have been avoided or minimised.	Section 7.1 of the updated BDAR (Appendix E) has been updated to discuss avoidance of biodiversity issues. Table 7-1 added and Figure 7-1 (now Figure 7-5 of the updated BDAR) updated to include biodiversity impacts only. Additional avoidance measures include removal of two wind turbines (WTG 126 and WTG 169) in vicinity of known raptor (Little Eagle, Wedge-tail Eagle) nests, removal of cabling and turbines in dense <i>Brachyscome papillosa</i> populations and removal of access track near Plains-wanderer sightings.
Impacts to Plains-wanderer habitat and recorded locations need to be avoided.	As discussed with BCS (meeting 4 December 2024) and the species expert, all native vegetation on-site can be assumed as habitat for this species, which are likely to range across the site as habitat structure

Comments or issues raised by BCS	Proponent Response
	changes with grazing and season. Avoidance based on habitat or recorded locations is not considered possible or warranted; approximately 2% of the habitat in the Project Area would be impacted which is considered to be a minor impact to its habitat. Access tracks between Turbine 83 and 84 have been removed to reduce fragmentation to an area adjacent to Plains Wanderer sightings. Strong and proactive mitigation seeks to achieve a net benefit for this species, set out in Section 9 of the updated BDAR (Appendix E), focussed on pest management. The species is only considered a SAI entity within the area mapped as Important Habitat as defined under the BAM. As the Development does not affect mapped Important Habitat for this species defined under the BAM, the species is not considered to be a SAI entity. However, an SAI assessment was still conducted based on the number of sightings of the species within the Project Area and can be viewed in Section 10.1.1 of the updated BDAR (Appendix E).
Potential SAI are unknown as flora species are assumed to be present.	Additional surveys were undertaken for Bindweed (<i>Convolvulus tedmoorei</i>) in Spring 2024 in areas previously assumed present and the species was not detected. Results of the additional survey areas are updated in Section 4.6.3 of the updated BDAR (Appendix E). Surveys were not able to be completed at the new site entrance intersection on the Sturt Highway, due to the updated Development Footprint for the intersection upgrade being provided after the survey window of the species. A total of 0.17 ha of habitat has therefore been assumed present at the site entrance intersection. Pre-clearance surveys of this 0.17 ha are recommended due to being a SAI entity. SAI assessment for the species was updated in Section 10.1.1 of the updated BDAR (Appendix E)
Variability across PCT 164 does not account for wetland areas and Gilgai habitats. PCT, Threatened Ecological Communities (TEC), and vegetation zone identification and mapping need to be revised and the biodiversity credit calculation updated.	A Gilgai assessment was undertaken in November 2024 and January 2025. 20 BAM plots and 20 Rapid Assessment points were undertaken in visible Gilgai locations. The results showed the vegetation mostly aligns to PCT 164. There were four exceptions, with these areas being small patches dominated by Nitre Goosefoot (<i>Chenopodium nitrariaceum</i>) and aligning to PCT 160, surrounded by the dominant PCT 164. These areas have been adjusted in the PCT mapping of the Subject Land. Gilgai assessment results have been updated in section 3.2.3 and Appendix A.3 of the updated BDAR (Appendix E).
Vegetation integrity (VI) scores need to be revised for each project Stage.	BAM plots were split into Stage 1 and Stage 2 Development Footprints. The allocation is shown in Section 3.3.1 of the updated BDAR (Appendix E). Two additional BAM plots were undertaken in January 2025 for inclusion into Stage 1 footprint. Six zones in Stage 1 were short of BAM plots. Justification for using BAM plots from Stage 2 is given in Appendix A.4 of the updated BDAR (Appendix E). BAM-C was updated with adjusted plots and the VI scores were updated in Section 3.3.2 of the updated BDAR (Appendix E).
Threatened flora recorded for Project EnergyConnect and on adjacent proposed wind farms should be included in the revised BDAR. New BioNet records for threatened flora, including SAI species,	A new Bionet search was undertaken in January 2025 and updated in Table 4-1 of the updated BDAR (Appendix E). As a result of <i>Eleocharis obicis</i> being detected in the Project Area, this species was added into the BAM-C as a candidate species.

Comments or issues raised by BCS	Proponent Response
should be included in the assessment to guide avoidance and mitigation measures.	<i>Eleocharis obicis</i> was not visible during November 2024 surveys - and no further targeted surveys were planned or samples able to be collected. <i>E. obicis</i> was detected in January 2025 surveys in a wetland, however this was outside of the survey window. <i>E. obicis</i> has been assumed present in areas of associated PCT 15, 17 160 & 163. Species surveys and species polygons have been updated in Sections 4.6.1, 4.6.2 and 4.6.3 of the updated BDAR (Appendix E). Species impacts and offset requirements are provided in Sections 8.1.2, 9.1 and 11.1 of the updated BDAR (Appendix E).
Microhabitats and survey effort for <i>Pilularia novae-hollandiae</i> need to be appropriately estimated.	<i>Pilularia novae-hollandiae</i> was surveyed in December 2024. Reference populations in the Project Area were surveyed to determine species presence and typical microhabitats. No <i>Pilularia novae-hollandiae</i> was detected at these reference population sites or within the Subject Land. Wetland habitat comprised of sedges was found at all <i>Pilularia novae-hollandiae</i> reference population locations. The reference populations in the Project Area occur in distinct wetland habitat, not typical of the vegetation across the Subject Land. No species polygons have been created for <i>Pilularia novae-hollandiae</i>. Results of these surveys were updated in Section 4.6.4 and Appendix A.5 of the updated BDAR (Appendix E). Assumed present species polygons have been removed and updated in the credit obligation.
Ensure survey effort meets threatened species survey requirements for Koala.	Justification for excluding koala habitat based on the highly degraded habitat in the Subject Land was provided to BCS by email in January 2025 and BCS concurred with NGH's approach to exclude the Koala from further survey. Koala survey methodology was updated in Section 4.6.3 of the updated BDAR (Appendix E) and consultation records with BCS provided in Appendix G.4 of the updated BDAR.
Species polygons need to be consistent with section 5.2.5 and Box 2 of the BAM.	Justification is provided for species polygons in Sections 4.6.1 and 4.6.4 of the updated BDAR (Appendix E). Updated species impacts are provided in Sections 8.1.2 and 11.1.2. Targeted surveys were undertaken in Spring 2024 and results were updated in Section 4.6.3 of the updated BDAR (Appendix E). A small patch of Slender Darling Pea (<i>Swainsona murrayana</i>) was detected in south eastern corner of the Subject Land between turbines 177 and 178, comprising seven individuals. A species polygon was created for this species, and direct impacts to detected individuals will be avoided by the Development Footprint. The site entrance intersection area was unable to be surveyed for the species and 0.17 ha of habitat has been assumed present in this area. <i>Lepidium monoplacoides</i>, <i>Solanum karsense</i>, <i>Leptorhynchus</i>, <i>Sclerolaena napiformis</i>, <i>Solanum karsense</i> and <i>Swainsona plagiotropis</i> were not detected during targeted surveys and are considered not to occur within Subject Land. Species polygons and credit obligations for these species have been removed. Bindweed (<i>Convolvulus tedmoorei</i>) was not detected during Spring 2024 surveys and has been excluded from these areas, however the site entrance intersection upgrade was unable to be surveyed within the survey period for the species and 0.17 ha of habitat has been assumed present for <i>Convolvulus tedmoorei</i>. Updated impacts and credit

Comments or issues raised by BCS	Proponent Response
	obligations are given in Sections 8, 9 and 11 of the updated BDAR (Appendix E).
The direct impact assessment needs to include impacts associated with the haul route. Some direct, indirect and prescribed impacts need to be appropriately assessed.	The haul route has been included as part of the Development Footprint and updated throughout the BDAR (Appendix E). Vegetation mapping, threatened species assessment and impact assessment has been updated to include the haul route. The off-site haul route encompasses the Sturt Highway from Euston to the Project Area and includes three intersection upgrades comprising an additional impact to 0.17 ha of PCT 164 at the site entrance on Sturt Highway, 0.16 ha of PCT 153 at the Euston intersection upgrade and 0.18 ha of exotic vegetation at the Balranald intersection upgrade. The Euston intersection upgrade was included as a new BAM-C case (00054223) as it occurred in a different IBRA subregion.
The indirect impact assessment should include turbine noise and loss of fauna habitat.	Table 8-6 of the updated BDAR (Appendix E) was updated to address the indirect impacts of wind turbine noise. Most of the research regarding turbine noise impacts on fauna, relates to birds but does include other fauna. Relevant research literature is cited in the updated BDAR (Appendix E, Section 8.2 Indirect Impacts) and applied with regard to potential interference with fauna calls. No additional mitigation is considered warranted. Table 8-6 has also been updated to include potential impacts of trench excavation and mitigation measures have been updated in Table 9-1 of the updated BDAR.
The prescribed impact assessment and proposed mitigation measures need to adequately address impacts of vehicle strike on Southern Bell Frog.	An adaptive management plan has been included in Section 9.2.2 of the updated BDAR (Appendix E) for the Southern Bell Frog. The plan discusses performance criteria, actions proposed and monitoring/management requirements to support the objective of no injuries/deaths occurring.
Prescribed impacts need to be assessed for each impacted entity.	Species or guilds have been updated as relevant in Section 8.3 of the updated BDAR (Appendix E), including: • disused windmill structures relevant to raptor nests, • habitat connectivity impacts to five fauna species, • hydrology changes relevant to one frog species, one mammal species and four flora species, • turbine and vehicle strike relevant to bird and bat guilds with specific discussion of species of concern.
The assessment of flight paths and collision risk needs to be revised.	Collision risk has been revised using the NSW government <i>draft Turbine Risk Assessment and Avoidance Guidance</i> (NSW DCCEEW, 2024) which resulted in higher risk levels for threatened species. Risk levels were updated where necessary in Section 8.3.4 of the updated BDAR (Appendix E of this Submissions Report) and the revised risk analysis report can be viewed in Appendix J of the updated BDAR. Flight paths have also been addressed within the Bird and Bat Utilisation Survey Final Report (Appendix J.22 of the updated BDAR). A summary of the flight paths is provided in Section 6.1.5 of the updated BDAR (Appendix E).
Mitigation measures should be detailed in the BDAR to demonstrate effective	Mitigation measures are updated in Table 9-1 of the updated BDAR (Appendix E) with extra details on actions, timing, and consequences of

Comments or issues raised by BCS	Proponent Response
management of impacts and to give confidence that the offset liability is adequate. Mitigation measures need to include more detail to demonstrate that impacts will be successfully managed.	residual impacts. The key management plan relevant to the Project is the Bird and Bat Adaptive Management Plan, which is now submitted in draft form (refer Appendix J.1 of the updated BDAR).
Matters of National Environmental Significance: Impacts to Plains-wanderer to address the specific project risks is unclear – existing access tracks should be used. Consider additional offsets and mitigation for this species.	Risks to this species have been characterised in accordance with Commonwealth guidelines. Appendix B of the updated BDAR (Appendix E) is updated with Assessment of Significance Impact for Plains-wanderer. Access track design must accommodate large machinery and use of existing tracks is not always achievable; 50 km of existing tracks are used. As all native vegetation in the Project Area is considered habitat for this species, approximately 2% of the habitat in the Project Area would be impacted, which is considered to be a minor impact. As discussed with DCCEEW (Cwth) (meeting 16 January 2025), all Plains-wanderer habitat will be offset (NSW ecosystem credits are generated for all PCT clearing). In addition, strong and proactive mitigation seeks to achieve a net benefit for this species, set out in Section 9 of the updated BDAR (Appendix E), focussed on pest animal management.
The area of EPBC-listed Natural Grasslands of the Murray Valley Plains Threatened Ecological Community needs to be assessed at the patch scale.	TEC was assessed at patch scale rather than BAM plot, and results provided in Section 5.1.2 of the updated BDAR (Appendix E). No changes to results of TEC areas.
A complete MNES assessment should be provided to address the Assessment Bilateral.	Section 5, Section 8.6 and Appendix B of the updated BDAR (Appendix E) have been updated to address MNES. 17 MNES assessments of significance have been undertaken and included in Appendix B of the updated BDAR. Results are summarised in Section 8.6 of the updated BDAR.
Any threatened flora records should be verified by a herbarium.	<i>Maireana cheelii</i> sample sent to herbarium during December 2024. The herbarium confirmation identification is included in Appendix I of the updated BDAR (Appendix E of this Submissions Report). <i>Swainsona murrayana</i> sample was not collected in field due to small population size.

4.2 Heritage NSW

Heritage NSW provided a number of comments and recommendations which are summarised and addressed in Table 4-3.

Baldon Wind Farm and NGH heritage consultants also met with Heritage NSW to discuss these matters on 19 December 2024 and records of the meeting agenda are provided in Appendix D. The responses below are shaped by those discussions and refer to an updated ACHAR (Appendix F.1).

Table 4-3 Response to Heritage NSW

Comments or issues raised by Heritage NSW	Proponent Response
The ACHAR specifies that the Development Corridor is largely confined to landscapes which generally have deflated surfaces and areas considered to have negligible potential for intact subsurface deposits. Consequently,	Table 10.4 and Table 11.2 in the ATR and Tables 6.4 and Table 7.2 in the ACHAR note that there are 10 sites in total that record PAD as a feature (6 PAD, 3 Artefact Scatter and PAD and 1 isolated artefact and PAD) that

Comments or issues raised by Heritage NSW	Proponent Response
no subsurface test excavation of potential archaeological deposits (PADs) was determined to be warranted within the proposed Development Corridor. Given the predictive model notes that subsurface deposits are most likely to occur "within areas of elevated flat land associated with ephemeral drainage lines, red sandy rises, sand hills or within source bordering dune systems" pg.41 and these landforms are recognised to exist within the Project Area, please provide further justification for why test excavations (both in association with the identified sites and in other areas where no surface evidence is present) are not required to inform the ACHAR in accordance with the SEARs. Considering the ACHAR states that an assessment of contour and Digital Elevation Modelling (DEM) data were used to inform predictive modelling around the likelihood of PADs, detailed mapping to illustrate the micro topographic features identified through this analysis may be used to support the predictive model and the conclusion for negligible potential for intact subsurface deposits with the Development Corridor. If adequate justification is not provided, Heritage NSW recommends that a program of test excavation be conducted, with the timing of any such program to be subject to discussion.	have undetermined harm and should be subject to further assessment if they cannot be avoided. The proponent has gone to considerable effort to avoid impacts to sites including those with PAD as detailed in the reports, and the aim is for the final development footprint to avoid impacts to as many of the ten sites that have PAD features (as mentioned above) as possible through micro-siting. However, should these sites require to be impacted by the development activity it is stated in the report that "...further assessment would be required of the Aboriginal Heritage values of these sites through subsurface testing prior to any disturbance to the sites and the buffered area that surrounds them" (ATR Section 11.2 Page 123). It is further noted that given the high likelihood that the sites with PAD can be avoided by micro- siting that testing of the PAD areas would in fact cause unnecessary impact to potential sites which may very likely not be impacted at all by the development. This approach is also in line with the wishes of the RAPs who were onsite that all efforts should be made to avoid sites with testing of PADs to occur only if they could not be avoided through micro-siting. Review of satellite imagery by NGH archaeologists and the Proponent in addition to the extensive visual inspections during pedestrian survey and other site visits to the Project Area by NGH archaeologists and Aboriginal community representatives were undertaken to maximise opportunities for the avoidance of sensitive sites and landforms. The extensive visual inspections of the development corridor during the pedestrian survey was able to confidently establish the boundaries of sites featuring PAD. DEM data was reviewed early in the assessment process to identify possible sensitive landforms and features at a more macro level to assist in the predictive modelling. However given the nature of the landscape, being very flat with very little relief across large areas, the DEM information was very broad in nature and not conducive to identifying small scale changes or features at sub landform level. Further detailed mapping of this data to refine areas of micro-topography is not considered by NGH to be effective in this landscape with the data available and therefore would not add value to the report. Additional text has been provided to clarify this in section 2.2.3 and 4.3 of the ACHA and 4.7 and 7.2.3 of the ATR. As noted above and clarified through the updated ACHAR and ATR, the identification of sites and establishment of boundaries were largely determined by visual inspection during the site surveys. Priority in the assessment was to avoid sites and areas of potential, which has been substantially achieved. The archaeological signature of this landscape indicates that mounds have the most concentrated Aboriginal heritage features containing stone artefacts of generally higher density, cooking events, burials and other material

Comments or issues raised by Heritage NSW	Proponent Response
	within mounded deposits and thus are also considered to be PADs. Due to their high cultural sensitivity, test excavation of mounds was only noted if the mound could not be avoided. Patterns of artefact distribution across the landscape are shown in the results and the mapping characteristic of a generally broad distribution but not necessarily in heavily concentrated areas outside mounds. Conducting subsurface test excavations in such a vast landscape, when we already have a good understanding of site distribution and potential impacts from the development proposal, is considered unwarranted in this situation. Furthermore, we are not certain that an effective and commensurate sampling strategy for testing such broad landforms would be able to be developed. The nature of the archaeology is one where there are few topographical or landform features that may concentrate the occupation and therefore be considered as PADs in the normal archaeological sense, outside of mounds. Rather, the distribution of stone artefactual material (the only objects to be effectively sought by testing) is broadly low density and testing is unlikely to pick up this background material. Even in the densest site areas, as shown in Figure 7-9 of the ATR, there are hundreds of metres between site occurrences. This is considered a real representation of the archaeological record of this area. Testing through sampling in between such recordings, even if uneroded areas were identified, is highly unlikely to be effective in finding archaeological evidence due to the overall low density across the broad landscapes. Significant additional discussion has been provided in section 4.3 of the ACHA and 7.2.3 of the ATR dealing with subsurface testing. Site avoidance and monitoring of some sensitive areas is considered a more appropriate management tool for this.
Please provide additional information regarding the 'Higher Sensitivity Areas' that have been identified within the Project Area including: how these areas were identified and defined, what the sensitivity is in relation to (e.g., potential for burials or other cultural materials such as stone artefacts), and the specific reasons for why these areas are not considered to be PADs, despite recommending "a limited program of sub-surface test excavation" (p.118 of Archaeological Report [AR]) if works extend into the higher sensitivity area surrounding the gypsum extraction area. Where these areas are assessed as having the potential to contain Aboriginal objects and/or values, additional investigation will be required to ensure adequate consideration of their significance and whether they have the potential to be directly or indirectly harmed by the proposed development.	Additional information has been provided to clarify the process for identifying and defining the Higher Sensitivity Areas in section 7.2.3 of the ATR and 4.3 of the ACHA. The proposed mitigation approach for the Higher Sensitivity Area surrounding the gypsum deposit has been amended to ensure consistency across all the Higher Sensitivity Areas and as the Higher Sensitivity Area surrounding the gypsum deposit does not warrant a program of subsurface investigation, the previous recommendation was incorrect and has been amended. Relevant recommendations have been updated as required.
Please update Appendix B of the AR (Site Description table) to include details of the site boundaries/ extents and identify how these have been determined as per	Text added to tables (Appendix B of ATR) and to section 7.2.2 in the ATR and 4.2 of the ACHA to confirm boundary determination. Pedestrian survey was the key method for

Comments or issues raised by Heritage NSW	Proponent Response
Requirement 6 and 7 of the <i>Code of Practice for Archaeological Investigation of Aboriginal objects in NSW</i> ('the Code of Practice; DECCW 2010).	identification of site boundaries, but this was sometimes supplemented by topographic mapping and aerial imagery. Site boundaries generally identified by exposures of cultural material.
Please clarify how it has been determined that the sites with PAD located outside of, but directly adjacent to, the Development Corridor (including BWF-1, BWF-19, BWF-37, BWF-66, BWF-68, BWF-69, BWF-76, and BWF-73) do not have the potential to extend into the impact area.	Additional text has been added to section on survey strategy (6.2 of ATR on pages 50 and 52). The PAD boundaries were identified by combination of field survey, local environmental details and exposures and topographic and aerial imagery review.
Please confirm whether the previously recorded Aboriginal sites within the Project Area were re-inspected during the site survey and clarify how it has been determined that they do not have potential to extend into the Development Corridor. Additional mapping which shows the site locations and boundaries for these previously recorded sites would help to address this matter.	Most of the previously recorded sites were well over 200m from the survey corridor and therefore only the two closest sites, AHIMS 48-4-0013 and 48-4-0541 were inspected. Both were confirmed to not extend into the development corridor. It was not possible to undertake a site visit of each of the remaining AHIMS sites noted as they were considerable distance from the survey corridor or on adjoining properties. Further mapping not considered necessary as issue dealt with in text and due to data limitations of the AHIMS information and field verification has occurred.
Please confirm whether the sites containing Aboriginal ancestral remains were recorded by, or reviewed by, a specialist physical anthropologist or other suitably qualified person with experience in recording such remains in accordance with Requirement 25 of the Code of Practice.	Process for burial notification has been included in page 65 of ATR. Note it was clear that from the number and context of the burials that they were Aboriginal and the police required no further reporting after initial two were found. This should also be noted for future surveys in this region.
The ACHAR contains a discrepancy in the total area recorded for the Development Corridor. The project description in Section 2.1, for example, refers to the area as being -2842 ha, in contrast the discussion of results and effective survey coverage sections the area is noted to be -2752 ha. Please review this discrepancy and clarify whether the effective survey coverage results have been calculated based on the correct data.	The correct areas is 2842 Ha. This has been updated in the survey coverage table, displaying effective coverage based on this data, and throughout the reports.
Please update the impact assessment presented in the ACHAR to distinguish between 'Total' and 'Partial' degree of harm in accordance with Requirement 11 of the Code of Practice.	Updated as requested, see Table 10-5 in ATR and 6-4 of ACHA.
The ACHAR states that "Disturbance to burials was typically from erosional processes however one (BWF-87) was noted as being on the margin of a vehicle track with likely impacts from a grader scrape being evident." pg.51. Please clarify whether the vehicle track adjacent to BWF-87 will be used for the current project and whether the impact assessment presented in the ACHAR has considered potential secondary impacts (e.g. road grading, road widening, public road upgrades, compaction, erosion) to sites such as BWF-87?	The track on which BWF-87 was located has been removed from the development area. There are no plans for use of this track for the development purposes. The land owner and the Hay LALC/NNTC are intending to discuss management to avoid future disturbances. Further consideration is not required as part of this ACHA, the site is included in the sites avoided list as no secondary impacts are anticipated.

Comments or issues raised by Heritage NSW	Proponent Response
There are a number of discrepancies and errors in the impact assessment presented in the ACHAR. According to Table 6-2, for example, sites BWF-40 (Mound), BWF-144 (Culturally Modified Tree) and BWF-163 (Culturally Modified Tree) are listed for avoidance. The latter two of these sites, however, are not included in Table 7-1 which outlines the sites to be avoided by the proposal and all three of these sites are included in Table 7-2 which indicates that impacts to these sites are undetermined. Please review and update for accuracy.	Impact assessment data discrepancies and errors have been corrected with some subsequent changes to the site impact data. All tables and report text has been updated to reflect the correct data.
Section 10.3 of the AR states that 21 of the newly identified Aboriginal sites within the Development Corridor "must be avoided by the development activity resulting in 140 sites currently avoided by the proposed development" pg.103. This is in contrast to other sections of the ACHAR which state that the impacts to these sites are undetermined. Please review this discrepancy and ensure consistency throughout the report.	Section 10.3 of the ATR has been altered to clarify and update the number of sites avoided and impacted. We have assumed, that the 22 sites with "undetermined" impacts will be avoided, thus there is a total of 139 sites avoided and 77 impacted.
Please provide additional or updated mapping to illustrate the location of the areas associated with undetermined impacts to support the impact assessment. This may be achieved using mapping conventions such as different shading for areas associated with powerline works.	Maps to illustrate the location of the areas associated with undetermined impacts to support the impact assessment are provided in Section 10:2 of the ATR.
Update the assessment of cumulative impact to include consideration of other large infrastructure projects in immediate local area such as the Keri Keri Wind Farm project, which is situated directly adjacent to the western boundary of the current project area.	Additional text and tabular data has been provided to address this point. Please refer to Section 6.2 of the ACHA Report.
Update the list of sites that are to be subject to subsurface excavation if they cannot be avoided (Table 11-6 in AR and Table 7-6 in ACHAR), and Recommendation 16, to include all sites with 'PAD' and/or 'Mound' as features (i.e. BWF-006, BWF-011, BWF-013, BWF-014, BWF-015, BWF-030, BWF- 031, BWF-032, BWF-033, BWF-034, BWF-035, BWF-036, BWF-195).	Tables in both reports have been amended to include all sites located within the development footprint requiring subsurface testing if cannot be avoided by ground disturbing development activity. A new recommendation has been added to address this activity. This is now Recommendation 16.
Update Recommendation 3 to include avoidance of the 108 newly identified Aboriginal sites located outside the Development Corridor as per the results of the impact assessment presented in the ACHAR which indicate total avoidance of these sites.	Recommendation 3 has been updated.
Amend the Surface Collection Methodology provided in Appendix C to include requirements for photographs and/or drawn records of representative / diagnostic stone artefacts (not just "particularly rare items") in accordance with Requirement 26 of the Code of Practice.	NGH view that the actions requested are not considered standard practice currently and not practical given the potential numbers of artefacts to be collected. However, we have amended the wording to a "sample of artefacts".
Update the list of sites to be subject to mitigation via surface collection provided in the table in Section C1 of 'Appendix C - Surface Collection Methodology' to include BWF-111 (AHIMS 48-4- 0706) consistent with information presented elsewhere in the ACHAR (e.g. Table 7-2).	Completed

Comments or issues raised by Heritage NSW	Proponent Response
Several recommendations include a requirement for monitoring for potential burials during initial ground disturbance works by the Registered Aboriginal Parties (RAPs) (e.g. Recommendations 14 and 15). Please provide an indicative methodology for this.	Baldon Wind Farm monitoring methodology (Indicative) is provided as Appendix D of the ACHAR.
Several recommendations mention that test excavations or sub-surface excavations may be required depending upon: (a) the final designs for the overhead powerlines (Recommendation 8), (b) if the gypsum extraction works extend outside of the area of low sensitivity (Recommendation 13), or (c) if hearths cannot be avoided (Recommendation 16). Please provide a methodology for the archaeological excavation proposed post approval and the process that will be undertaken to assess the results of the test excavation. This methodology must be developed in consultation with the RAPs and must include a. Detail of excavation procedure proposed. b. Criteria/triggers for the significance assessment of sites considering the results of test excavation and determination of appropriate management and mitigation measures. c Provisions for the conservation and avoidance of highly significant Aboriginal cultural heritage that may be identified during the test excavations. d Consideration and provisions for the presence of burials in subsurface contexts which were identified as a potential site type on the Hay Plain within the predictive model.	Baldon Wind Farm test excavation methodology (Indicative) is provided as Appendix E of the ACHAR. The intention is to finalise the methodology as part of the ACHMP process, where RAPs will be consulted on the approach and provided an opportunity to provide feedback.
The management recommendations outlined in Appendix D of the AR indicate that no demarcation /high visibility fencing of Aboriginal sites for avoidance is required unless works are being undertaking within a certain trigger distance from that site. Please clarify whether the trigger distances for site demarcation refer to the distance from the registered point location of a site or from its recorded boundary. To ensure the efficacy of such recommendations, where the trigger distance is from the site boundary, please update Appendix D to include dimensions for each site extent and the distance of the Development Corridor from the recorded site boundary. Alternatively, where the trigger distance is from the registered point location of a site, please ensure that the proposed trigger distance is appropriate for the size/extent of each site, noting that some Aboriginal sites located within the project area are quite large (e.g. BWF-18 represents a mound complex noted to be 220 meters in maximum dimension).	Details have been updated in Appendix D of the ATR regarding site area. Text also added to the Fencing requirements in the ATR and ACHA to confirm trigger buffers are based on site boundary.
Please confirm that the site card for Pump Site 2 (AHIMS # 48-4-0075) has been updated to correct the identified location error which places the site outside of the Project Area as outlined in Section 2.3.5 of the ACHAR.	The site information in AHIMS has been updated, confirmed by email from AHIMS on 28/1/24. The reports have been updated accordingly.
Section 2.3.6 of the ACHAR indicates that searches of the heritage registers were completed on 1 November 2022. Please update and review for currency.	The searches were updated in January and February 2024.

Comments or issues raised by Heritage NSW	Proponent Response
	Since it has been another 12 months, they have again been updated in February 2025.
The AHIMS identifier for BWF-94 is incorrect/incomplete throughout the ACHAR. Please review and correct this error.	AHIMS identifier updated in all reports.
Please update Figure 2-10 in the ACHAR to include AHIMS identifiers and site boundaries.	NGH argues that due to the scale of the map and the clustering of the AHIMS sites, adding data labels would not make the maps readable at this scale. Adding site boundaries is also not possible as AHIMS data does not provide this and checking all site cards for so many sites with a disparity in site recording techniques and information is also not achievable. We note Figure 2-11 in the ACHA does include AHIMS site labels as these are referenced in the report with further descriptions in Table 2-8 as they are within the overall project area and of more relevance. At this scale, this is the best information able to be provided for context.
Please update Figure 7-1 and Figure 7-2 in the ACHAR to include labels of the site names for all sites/ site boundaries which intersect with the 'Higher Sensitivity Areas'.	Maps that include labels of the site names for all sites/ site boundaries which intersect with the 'Higher Sensitivity Areas'. are provided as updated Figure 7.1 and 7.2 of the ACHAR.

4.3 Transport for NSW

Transport for NSW (TfNSW) provided a number of comments and recommendations which are summarised and addressed in Table 4-4. The nature of the issues raised by TfNSW are primarily related to NSW, State road network impacts during construction and operation of the Project, as described in the Traffic Impact Assessment (TIA) and Over-Size Over-Mass (OSOM) Route Study, including:

- Adequately address Project traffic volumes and types,
- Suitable design of NSW road upgrades and site access, and
- Clarify OSOM transport route and impacts to the State road network.

Baldon Wind Farm also met with TfNSW to discuss these matters on 27 November 2024 and meeting minutes are provided in Appendix D. The responses below are shaped by those discussions and importantly this Submissions Report includes:

- An updated OSOM Route Study (Appendix H), and
- An updated Traffic Impact Assessment (Appendix I).

Table 4-4 Response to TfNSW

Comments or issues raised by TfNSW	Proponent Response
Key issues	
1. The project traffic volumes and types impact the State Road network, particularly the Sturt Highway, which have not been adequately addressed. Updates are requested to the turn warrants assessment to identify the worst-case	An updated Traffic Impact Assessment (Appendix I) includes completed turn warrant assessment scenarios for the road network peak hour vs. project traffic peak hour (including background traffic, cumulative traffic from other nearby major projects and workforce accommodation traffic) and

Comments or issues raised by TfNSW	Proponent Response
scenario for the background traffic and turning volumes, in line with the requirements of <i>Austroads Guide to Traffic Management and TfNSW supplements</i> . Refer to point 1, Attachment 1.	confirmed the Project traffic peak hour is critical. More details are provided in response to Attachment 1 Item 1.
2. Updated strategic concept designs for the road upgrades are requested. The project intersection strategic designs must be updated based on the outcome of the updated analysis and to ensure that the largest vehicles entering the project site can be accommodated within the pavement. Refer to point 2, Attachment 1.	Updated strategic concept designs for the road upgrades are provided in the revised TIA. The Project intersection strategic designs (Appendix F of the updated TIA) are updated based on the outcome of the updated analysis and to ensure that the largest vehicles entering the project site can be accommodated within the pavement. More details are provided in response to Attachment 1 Item 2.
3. The high-risk oversize over mass (OSOM) vehicle route assessment does not fully consider impacts to the state road network across all identified routes. In addition, swept path and rail corridor impacts (with TfNSW as the rail authority applicable) also require consideration. Further detail regarding these impacts is requested to ensure the compliance of the road upgrades and mitigation measures in accordance with <i>Austroads Guide to Road Design</i> , <i>Austroads Guide to Temporary Traffic Management</i> , and TfNSW requirements. Refer to point 3 (a), (b) and (c), Attachment 1.	A single OSOM route is now proposed from Port Adelaide to the site. Updated swept path drawings and strategic concept designs for all proposed OSOM route road upgrades in NSW are provided in Appendix E of the updated TIA. More details are provided in response to Attachment 1 Item 3 (A), (B) and (C).
4. The Port of Adelaide and Newcastle routes require specific detail to assess the impacts of OSOM vehicle movements on public assets. This will include further engagement with TfNSW due to the developing situation in the South-West Renewable Energy Zone. Refer to Attachment 2.	As per the updated Route Study (Appendix H) and updated TIA (Appendix I), the Project no longer proposes to use the route from Port of Newcastle and proposes to use the route from Port Adelaide only. The Proponent met with TfNSW on 27 November 2024 to discuss the potential impacts of OSOM vehicle movements on public assets and road transport planning developments for the South West REZ. More details are provided in response to Attachment 2 of the TfNSW submission below and meeting minutes are provided in Appendix D.
TfNSW has provided advice in relation to Country Rail Network (CRN) rail crossings associated with the proposed haulage routes as part of Attachment 1. TfNSW further advises that the proposed haulage routes include crossing rail corridors managed by agencies other than TfNSW. It is recommended that DPHI refer this application to the Australian Rail Track Corporation (ARTC) and Sydney Trains for their consideration and advice.	The Project no longer proposes to use the transport route from Port of Newcastle and there are no rail crossings within NSW along the proposed transport route from Port Adelaide via Robinvale. Consultation with ARTC, Aurizon and V-line rail authorities in SA and Vic has commenced in regard to OSOM rail crossing permits (generally to be submitted nearer to the time of travel) and a proposed new rail crossing at Red Cliffs in Victoria (V-line).
Attachment 1	
1. Traffic Impacts on State Road Networks – turn warrant assessment requirements The revised TIA should include turn warrants assessment for each project access and intersection	An updated Traffic Impact Assessment (Appendix I) has completed turn warrant assessment scenarios for the road network peak hour vs. project traffic peak hour and confirmed the Project traffic peak hour is critical.

Comments or issues raised by TfNSW	Proponent Response
on the State road network to capture the extent of the scope of the road upgrades for the project. The turn warrant assessment is to be prepared in accordance with Austroads Guide to Traffic Management Part 6 and include the following: - The accumulative traffic for the project or approved Major Projects that would be present in the background and turning traffic volumes for any shared intersections or primary accesses required for each stage of the project, including the workforce accommodation scenarios. - Asses the two scenarios for the workforce accommodation presented in the TIA onsite and the use of the Project EnergyConnect. The assessment is to be extended to include the timing for the provision of the workforce accommodation, any parallel construction activities, accommodation requirements for pre-construction minor works, changes to the routes, volumes, and vehicle types, and directions prior to and post occupation of the workforce accommodation. - Provide an assessment of the traffic volumes, types, distribution splits and direction, and routes for each stage of the project inclusive of pre-construction minor works. Traffic mitigation measures and scope of road upgrades are to be identified for each stage of the project. - Provide a comparison of the project and network peak hour traffic volumes; if there is an avoidance of the network peak hour to reduce the scope of the road upgrades for the project, mitigation measures need to be included to ensure compliance in with Austroads.	- The Project traffic peak hour assessment includes background traffic including cumulative traffic from other major projects and workforce accommodation traffic. - The updated TIA has reviewed the Project EnergyConnect workforce camp at Balranald vs. on-site workforce accommodation camp (Section 4.2.2.2 of the updated TIA). The TIA originally assumed that the Balranald camp would be used, and the updated TIA confirms that this represents a conservative (worst-case) scenario for traffic generation. There is no impact to the required turn treatments / access design or any other elements of the analysis. The assessment has been extended to consider the timing of establishment of the on-site accommodation camp and other details raised by the submission. If the on-site workforce accommodation camp were to be used, it would be established after the site access road upgrades are constructed and prior to the commencement of formal construction activities and would be operational for the full duration of the construction activities. - Traffic generation at various stages of the Project (including pre-construction) is assessed at Section 4.2 of the updated TIA and traffic distribution at Section 4.3. The assessment focusses on the peak construction period as this is when the most significant impacts are generated which dictates the road upgrades. Traffic mitigation measures and scope of road upgrades are identified at Section 9 of the updated TIA and are proposed to be implemented prior to construction commencing. - The updated TIA includes assessment of the Project peak hours and road network peak hours. The assessment indicates that with the additional traffic generated by the Project, the Project peak hours would become the overall peak hours of the road network and, are therefore critical for the purposes of the assessment. This is consistent with the EIS TIA.
2. Update strategic concept designs for Sturt Highway intersection road upgrades Intersection design is required to be upgraded in compliance with Austroads and relevant TfNSW requirements. The Strategic Concept design for the proposed intersection with Sturt Highway will need to be updated in line with the following: - Identify whether lighting of the intersection is required and if so, how this will be achieved. - Include a 1.0 m verge with rounding, to be provided adjacent to the shoulder. - The departure chevron island appears too narrow through the intersection. The width should be consistent through the right turn lane and the chevroned area (lane markings). - Ensure intersection returns are tangential. The current proposed layout introduces a deviation	The Project intersection strategic designs are updated based on the outcome of the updated analysis and to ensure that the largest vehicles entering the Project site can be accommodated within the pavement (refer to Appendix F of the updated TIA). Items 2(a-d) have been addressed in the revised site entrance design drawings and lighting is not required. The private property access on the northern side of the Sturt Hwy is a rarely used property access with a locked gate restricting use. It will not be used for the Project. These restrictions are noted on the design drawings and the northern property access is therefore not designed as an intersection with the Project site access.

Comments or issues raised by TfNSW	Proponent Response
between the rural basic left turn (BAL) widening and the side road access which impacts the scope of the road widening which needs to be addressed. e. Clarify if the area north of the Sturt Highway is required to be accessed during the project, as the current design creates a possible vehicle conflict scenario. The design plans are to be amended to remove the conflict risk. Consider the assessment and mitigation measures required for moving the northern site access, crossflow movements and staggering the intersection with appropriate treatments per Austroads Part 4A, Section 7.2. If the northern access is not to be used, closure will need to be clearly identified in the plans.	
3. (A) Update high-risk OSOM route assessment for all routes The following section provides overall considerations for all identified routes in the assessment provided, which need to be resolved and included within the revised TIA. Refer to Attachment 2 for specific comments related to routes from the Port of Newcastle and Port of Adelaide. a. Traffic of heavy mass vehicles and vehicles with very large axle group loadings are proposed, which may be an issue for older short span bridges. The OSOM route requires bridge assessments (and culverts) to be undertaken with particular consideration to the Balranald Bridge over the Murrumbidgee river. <i>Note: Results of the bridge assessments may result in a change to the route which must be provided in an updated route assessment. TfNSW encourages the Applicant to consult on bridge assessments.</i> b. An extensive review of the height obstructions along the high-risk OSOM route (e.g., powerlines and gantry heights) is required, and mitigation measures to navigate them must be clearly identified. c. Intersection widening is proposed along the routes. Strategic concept designs must be updated with information regarding the transverse and longitudinal drainage needs, including pipe class and loading, as part of culvert diagrams. d. Dimensions of swept paths and parking plans must be provided for each pullover, layby, and rest area on OSOM routes, demonstrating applicable high-risk OSOMs can physically be accommodated and mitigate impacts to other road users.	a. A bridge and culvert assessment were requested from TfNSW Special Permits Unit (SPU) by email on 25 September 2024. This was discussed at a meeting with TfNSW on 27 November 2024 and followed with another email also on 27 November 2024. Additional information was supplied to SPU by email on 29 April 2025. Baldon Wind Farm is now awaiting advice from SPU. A detailed review of the load limits on all bridges and structures along the route will be undertaken as part of the permit process for the OSOM vehicles. b. The project proponent has commenced enquiries with Essential Energy's High Load Transport team regarding overhead powerline clearances along the proposed OSOM route within NSW (with a proposed max loaded height of 6.3 m) and relocation of street light poles and a power pole at one intersection (10 January and 3 April 2025). No reply has been received to date. As per the OSOM route assessment, there are no other restrictive overhead structures along the proposed OSOM route in NSW. c. Updated swept path drawings and strategic concept designs for all proposed OSOM route road upgrades in NSW are provided in Appendix E of the updated TIA. A typical culvert diagram is provided on Sheet SEC-1, based on an example received from TfNSW. Drainage requirements (e.g. culvert locations and cut and fill requirements) would be identified by site survey at detailed design stage. Environmental assessment of the road upgrades completed as part of this Response to Submissions report has included a 10 m buffer in addition to the expected disturbance areas to allow for construction activities and drainage infrastructure (which would be determined during detailed design). Refer to the updated BDAR (Appendix E) and Addendum ACHAR (Appendix F.2). d. Swept paths and parking plans for the proposed OSOM pullovers, layby and rest areas in NSW, and commentary about the pavement quality of rest areas is included in the updated Route Study (Appendix H). This includes

Comments or issues raised by TfNSW	Proponent Response
<i>Note: Locations (including GPS Coordinates) and identification of the OSOM design vehicle used to access each pullover, including rest areas must be included.</i> e. The route assessment needs to include temporary safety mitigation measures and remediation treatments. i.e., where raised concrete medians are required to be removed, please state how this will be remediated post construction. f. The Traffic Control Signs (TCS) layout and changes to TCS are required to be assessed for each route. Changes to TCS may require a strategic design to be provided. g. The location and details of light poles to be relocated on the State road network must be clearly identified (e.g., Gillenbah Intersection). The proposed relocations must comply with Australian Standards - AS1158.1 and TfNSW requirements. h. Timing of high-risk OSOM deliveries within the construction schedule, indicative weekly program(s), and timeframe to complete deliveries from relevant port to the site are required. i. Details of road geometry and alignment along the identified transport routes must be clearly identified, including: - existing formations, crossings, medians, transmission lines, roundabouts, bridges, intersection treatments and any identified hazards; - each at-risk road structure i.e., bridges, traffic signals, signage, powerlines, medians, major and minor culverts. j. Seven routes to the subject site have been suggested. Clarification is required for which routes will be utilised.	review of the ability for other vehicles to concurrently use the rest areas. e. The updated strategic concept designs for all proposed OSOM route road upgrades in NSW (in Appendix E of the updated TIA) have provided permanent road treatments rather than temporary measures. f. TCS are related to traffic lights along the route from Port of Newcastle, which was proposed as an option in the EIS. The Project no longer proposes to use the route from Port of Newcastle and proposes to use the route from Port Adelaide only, as per the updated Route Study (Appendix H) and updated TIA (Appendix I). There are no traffic light changes identified along the Port Adelaide route. g. The location and details of light poles to be relocated on the NSW State road network are clearly identified in the Route Study (Appendix H) and by the updated strategic concept designs in the updated TIA. A lighting plan will be prepared for these intersections at detailed design stage. h. The updated Route Study includes a sample/indicative weekly OSOM delivery schedule. i. The updated Route Study (Appendix H) includes swept path sketches for all required road modifications as well as loaded dimensions (lengths, widths and heights) of proposed transport combinations. Strategic concept designs for the proposed NSW road modifications are included in Appendix E and F of the updated TIA (Appendix I). j. As per the updated Route Study and updated TIA, the Project no longer proposes to use the route from Port of Newcastle and proposes to use the route from Port Adelaide only. Also, with the exception of an alternative route between Port Adelaide and Moorook South in South Australia (~210 km) for high loads, a single route is now proposed from Port Adelaide to the Project, rather than the four Port Adelaide route options presented with the EIS (refer to Figure 3-2).
3. (B) Update swept path assessments for all State roads Swept paths are to be provided for each of the identified and State roads for the design vehicle (e.g., B-double) demonstrating the concurrent turn movements in all directions and for the check vehicle (the largest high-risk OSOM) demonstrating that the check vehicle will complete the arc within the pavement and the offset requirements without creating additional impacts to State road assets.	Appendix F of the updated TIA includes swept path sketches and strategic concept design for the site entrance design intersecting Sturt Hwy and assumes the largest high-risk OSOM vehicle.
3. (C) Inclusion of Country Rail Network rail crossing impacts in the route assessment All matters involving the Country Rail Network (CRN) must adhere to the transport management and safety	The Project no longer proposes to use the transport route from Port of Newcastle and there are no rail crossings within NSW along the proposed transport route from Port Adelaide.

Comments or issues raised by TfNSW	Proponent Response
requirements of RGLRL and TfNSW. Relevant approvals for use, impact or changes to level crossings must be sought from UGL Regional Linx (UGLRL) and TfNSW. Any potential and known adverse impacts to the rail crossings along the CRN must be considered, with all crossings clearly identified, and included in the high-risk OSOM route assessment, revised TIA and the RtS. This includes the following routes: - Port of Newcastle (Route 1) – The Heavy Vehicles and OSOM access route will be crossing the CRN non-operational rail corridor at three (3) locations: [...] - Port of Newcastle (Route 2) – The Heavy Vehicle and OSOM access route will be crossing the CRN operational and non-operational rail corridor at seven (7) locations: [...]	Consultation with ARTC, Aurizon and V-line rail authorities in SA and Vic has commenced in regard to OSOM rail crossing permits (generally to be submitted nearer to the time of travel) and a proposed new rail crossing at Red Cliffs in Victoria (V-line).
Attachment 2	
Additional information requested The Applicant is requested to engage with TfNSW on the preparation and provision of the additional information below, due to the on-going nature of road assessments occurring along the multiple route options identified for the project. The additional information should be provided with the RtS and a revised TIA. The Applicant is encouraged to engage with other developers in the area or utilising the transport routes to consider coordination to establish operational management of high risk OSOM movements	The Proponent met with TfNSW on 27 November 2024 to discuss these matters. Meeting minutes are provided in Appendix D. As per EIS mitigation measure T6, Baldon Wind Farm will coordinate OSOM transport movements with other parties, including other wind farm developers in the region, to limit the impact to the road network. Such engagement would commence once the South West REZ access rights have been awarded and relevant projects confirmed and schedules of construction works are being developed.
1. High Risk OSOM Port of Newcastle Routes 1 and 3: [...]	As per the updated Route Study and updated TIA, the Project no longer proposes to use the route from Port of Newcastle and proposes to use the route from Port Adelaide only. And, with the exception of an alternative route between Port Adelaide and Moorook South in South Australia (~210 km) for high loads, a single route is now proposed from Port Adelaide to the Project, rather than the four Port Adelaide route options presented within the EIS (refer to Figure 3-2).
2. High Risk OSOM Port of Newcastle Route 2 via Golden Highway, Newell Highway, Sturt Highway and Kidman Way: [...]	
3. Considerations for all routes from the Port of Newcastle: [...]	
4. High Risk OSOM Comments on Port of Adelaide all Routes The following section provides assessments to be undertaken for route assessments 1 through 4 from the Port of Adelaide. - Port Adelaide to Baldon Wind Farm via Robinvale - Port Adelaide to Baldon Wind Farm via Mildura - Port Adelaide to Baldon Wind Farm – High Load Detour Route Option 1 - Port Adelaide to Baldon Wind Farm – High Load Detour Route Option 2 - Page 25 of the TIA references that the State government will be providing route and upgrade works for OSOM vehicles from the port to the	- Reference to the State government providing route and upgrade works for OSOM vehicles from the port to the South West REZ have been deleted from the updated TIA. The updated Route Study (Appendix H) includes swept path sketches for all required road modifications and Appendix E and F of the updated TIA (Appendix I) includes strategic concept designs for the proposed NSW road modifications. - The location and details of light poles to be relocated on the NSW State road network are clearly identified in the Route Study (Appendix H) and by the updated strategic concept designs in the updated TIA. A lighting plan will be prepared for these intersections at detailed design stage.

Comments or issues raised by TfNSW	Proponent Response
South-West Renewable Energy Zone (REZ). TfNSW advises that the routes and extent of any road upgrades for the South-West REZ have not yet been determined. Road upgrades to facilitate the high-risk OSOM deliveries are the responsibility of the Applicant. The scope of all required road upgrades is to be identified by the Applicant within a revised route assessment and supported by strategic concept designs for each road upgrade to the State road network. b. Any proposed changes to existing lighting arrangements require review and approval from TfNSW. These arrangements must be clearly indicated in the route assessment and may require a strategic design. c. There is concern about OSOM axle weights on the pavement condition and the culvert/bridge network along the Sturt Highway. It is likely that significant areas of the Sturt Hwy may experience major pavement failures with the significant OSOM movements proposed. Further information regarding OSOM weights and axle loadings is required. Road upgrades may need to be included within the revised route assessment to minimise the impact of high-risk OSOM on the Sturt Highway.	c. Section 6.4.5 of the updated TIA (Appendix I) includes a qualitative assessment of pavement loading due to Project OSOM movements versus the permissible mass limits under the Class 1 scheme and existing traffic loading on the State roads. It found that the proposed axle loads for all components are expected to be within approximately 7% of the permitted axle loads under the Class 1 scheme for the closest available trailer/dolly specifications.

4.4 Hay Shire Council

Hay Shire Council (HSC) provided a number of comments and recommendations which are summarised and addressed in Table 4-5. The nature of the issues raised by HSC are primarily related to:

- Construction traffic – damage to local roads,
- Traffic – road upgrades proposed by the Project,
- Decommissioning, scope of, and
- Potential aviation impacts.

Baldon Wind Farm met with Hay Shire Council to discuss these matters on 23 January 2025. The responses below are shaped by those discussions and a summary letter from HSC dated 18 February 2025 agreeing the below responses is provided in Appendix D (Engagement Records).

Table 4-5 Response to Hay Shire Council

Comments or issues raised	Proponent Response
Council seeks further consultation about damage to local roads (Maude Road) if proposed to be used by heavy vehicles during Project construction.	As per the updated Over-Size Over-Mass (OSOM) Route Study (Appendix H) and Traffic Impact Assessment (Appendix I), Maude Road is not part of the proposed OSOM route. As per mitigation measure T1 of the EIS (refer to Table 6-32 of the EIS) a Construction Traffic Management Plan (CTMP) will be prepared and implemented. The TMP will be prepared in

Comments or issues raised	Proponent Response
	consultation with TfNSW and relevant councils. The TMP would provide additional information regarding: • Traffic volumes, distribution and vehicle types • Identification of designated transport routes, access and delivery schedules • Consultation with neighbours and local authorities regarding heavy vehicle and OSOM deliveries • Identification of dilapidation reports to be prepared for roads used frequently by the Project. Dilapidation surveys will be completed for local roads if they are nominated as part of a haulage route (used by heavy vehicles)
Removal of below ground structures to 1.0 m depth.	A Soils, Land and Agriculture Impact Assessment report was prepared as part of the EIS. It is included in Appendix F.7 of the EIS and summarised in Section 6.9 of the EIS. Decommissioning will include removal of all above ground infrastructure or, where infrastructure is unable to be removed, such as wind turbine footings, reinstatement of minimum 0.5 m soil capping. Removal of below ground infrastructure is considered to cause unnecessary ground disturbance after more than 30 years of ground cover establishment and provide marginal benefits to future land use. However, materials recovery will be a consideration in the context of circumstances prevailing at the end of project life. Areas disturbed during decommissioning will be rehabilitated by replacement of topsoil (or capping material equivalent to surrounding areas) including seeding and soil amelioration if necessary. Either native vegetation or grazing pasture will be reinstated, unless otherwise agreed with the landowner and/or regulatory authorities. A small number of permanent infrastructure may remain in the Project Area, limited to TransGrid assets (electrical substations), any centralised BESS and internal access tracks that the landholder might wish to retain. In the case of reinstating agriculture land use, soil class and productivity potential would be re-established equivalent to pre-Project levels. These and other rehabilitation provisions for decommissioning are outlined at Table 6-52 of the EIS.
Lighting for WTGs and met masts.	An Aviation obstacle lighting plan prepared (Appendix J) to address CASA and Hay Shire Council submissions. We understand from consultation with HSC (23 January 2025) that HSC supports the lighting on WTGs as per the proposed lighting plan and prefers the low intensity lighting ($\geq 200\text{cd}$), which is consistent with the requirements of a number of other wind farms.
Local and regional road upgrades to be consulted with Council: Any widening of council roads requires consent from Council and an approved design to the satisfaction of the Council engineer. Tree removal at intersection of Cobb and Sturt Highways – this would not be preferred by Council.	No modifications to Council roads are proposed. As per Section 3.3 and Appendix H of this Submissions Report, the Project now proposes to utilise an Over Size Over Mass (OSOM) transport route from Port of Adelaide to the Project site only and is no longer proposing an OSOM route from Port of Newcastle direction.

Comments or issues raised	Proponent Response
	In the unexpected event that Council roads required widening or other modifications in future, Council would first be consulted and, an updated environmental assessment and suitable planning application/amendment would be prepared.
Any adjustments to PANS-OPS and LSALT is to be undertaken in consultation and agreement with Council as the aerodrome operator.	Feedback from CASA on the additional recommendation for engaging with Airservices Australia and Council as the aerodrome operator regarding the changes to the PANS-OPS and LSALTs will be adopted after the detailed design phase and prior to the offending WTGs being erected.
Consultation with Hay aerodrome users.	The Aviation Impact Assessment was provided to the Hay Shire Council as the aerodrome operator for feedback in February 2024. Further follow up with the Hay Shire Council on the matter has taken place including a review of the Aviation Obstacle Lighting Plan.

4.5 Murray River Council

Murray River Council provided a number of comments and recommendations which are summarised and addressed in Table 4-6. The nature of the issues raised by MRC are primarily related to:

- In-principle support for the Project
- Community benefit sharing, developer contributions and Voluntary Planning Agreements
- Waste and resource management
- Pressure on community infrastructure and services
- Construction traffic – damage to local roads
- Workforce employment opportunities and development
- Workforce accommodation
- Community consultation
- Potential cumulative environmental, social and infrastructure impacts.

Baldon Wind Farm met with Murray River Council to discuss these matters on 27 March 2025. The responses below are shaped by those discussions.

Table 4-6 Response to Murray River Council

Comments or issues raised	Proponent Response
Submission dated 9 September 2024	
In-principle support for Goldwind's development application	In-principle support of MRC for the Baldon Wind Farm development is acknowledged.
Generic comments about renewable energy projects, non-specific to the Project, including:	Section 6.4.4 of the EIS outlines how meaningful social and economic benefits are expected to be delivered by the Project to the local and regional community through the following programs:

Comments or issues raised	Proponent Response
<i>Council will encourage communities to look beyond ‘small improvement’ projects funded via any community benefits programs and instead look towards long-term sustainable pathways for education, health or similar in the aim of addressing services that are declining or aren’t currently available in the LGA.</i>	• Community and Stakeholder Engagement Strategy (CSES) • Community Consultative Committee (CCC) • Industry and Aboriginal Participation Plan (IAPP) • Community Benefit Sharing Program (CBSP). The Community Benefit Sharing Program will be managed in partnership with the community and Murray River and Hay Shire Councils.
Please note that these comments are in addition to planning and/or infrastructure comments that relate specifically to this application. These matters will be addressed by Murray River Council’s Planning Department in due course	See below – additional submission from Murray River Council dated 6 February 2025.
Submission dated 6 February 2025	
Whilst Council is overall supportive of the proposals, Council expects the following comments and recommendations to be taken into consideration.	In-principle support for the Baldon Wind Farm development is acknowledged.
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. The Riverina and Murray Joint Organisation (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.	As per mitigation measure R1 of the EIS (refer to Table 7-22 of the EIS), the Project is committed to developing a Waste Management Plan prior to commencement of construction that considers: • Baldon Wind Farm is able to reasonably accurately predict quantities of potential waste materials grouped in various waste streams and will seek options that reflect sustainable outcomes under Waste Management Hierarchy • Identification of opportunities to avoid, reuse and recycle materials, in accordance with the waste hierarchy. • Quantification and classification of all waste streams for the respective project stages. • Disposal of waste at facilities permitted to accept the waste. • Ensuring that any use of local waste management facilities does not exhaust available capacity nor disadvantage the local community. Baldon Wind Farm will consult with relevant Councils during the plan development and seek feedback to guide the plan development.
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.	The Project would not use any waste facilities without agreement from the operator. Buronga Landfill and Mildura are not nominated by the EIS to receive Project waste (or recyclables). Baldon Wind Farm met with Hay Shire Council to discuss their EIS submission and other matters on 23 January 2025 and a summary letter from HSC dated 18 February 2025 outlining the agreed responses is provided in Appendix D. Hay Shire Council extended an in-principle offer to support the Project’s waste

Comments or issues raised	Proponent Response
	requirements, via a Waste Management Agreement that would see Baldon Wind Farm support Council waste management initiatives also.
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.	Section 6.4.4 of the EIS outlines how meaningful social and economic benefits are expected to be delivered by the Project to the local and regional community through the following programs: • Community and Stakeholder Engagement Strategy (CSES) • Community Consultative Committee (CCC) • Industry and Aboriginal Participation Plan (IAPP) • Community Benefit Sharing Program (CBSP). The Community Benefit Sharing Program will be managed in partnership with the community and Murray River and Hay Shire Councils.
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 [internet] connectivity due to the workers camps using the available internet, • impact on council’s sewer systems and 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.	Baldon Wind Farm would consult with an Internet Service Provider to have a stable internet connection at the workforce accommodation camp (on-site or at the existing workers camp at Balranald, as described at Section 3.3.10 of the EIS). A range of connection options will be investigated including satellite-based services. In such cases, connectivity for the surrounding community would not be affected. The Community Consultative Committee (CCC) (refer to Table 6-27 of the EIS) will allow these types of Project related matters to be raised, discussed and addressed appropriately. Potential impacts to sewer and water, roads and infrastructure are addressed in rows below.
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 <i>Water Management Act 2000</i>, the Applicant is required to obtain the necessary water licences for the development	The Project is not relying on using Murray River Council’s water or sewer infrastructure. Water availability for Project requirements is outlined at Section 6.8.3 of the EIS and further reviewed in response to DCCEEW Water’s submission (refer to Section 4.7). To show the feasibility of accessing the local groundwater resource within the Murrumbidgee Alluvium Water Resource Plan, a Water Access Licence (zero share) was applied for and subsequently granted by NSW DCCEEW on 30 April 2025 (reference no. 50AL514959, valid until 27 October 2025). The Project would secure an updated WAL and purchase sufficient temporary water entitlements on the water market for Project requirements prior to the commencement of construction. Hay Shire Council has provided in-principle agreement to supply the potable water requirements from their water treatment plant

Comments or issues raised	Proponent Response
	(email 7 March 2025, refer Appendix D). This may be supplemented by rain water tanks installed at the camp. The sewage requirements of the on-site workforce accommodation camp, and any potential impacts on Council infrastructure and wastewater treatment plants, is addressed in response to DPHI's submission at Section 4.16 of this Submissions Report. As indicated in the response to DCCEEW Water (refer Section 4.7), it is intended that wastewater generated from the accommodation camp would be transferred to the Balranald wastewater and sewage scheme via tanker. Discussions with Balranald Council (in-person meeting during public info drop-in session 15 November 2024) confirmed the system has adequate capacity to manage wastewater generated at the peak of construction.
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. 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 unsealed roads that is deemed to be caused to by the additional development traffic.	As per the Site Layout drawing in the EIS (Figure 1-2), the primary site access will be directly from the Sturt Highway. Secondary site accesses from Baldon Road in the south and east of the Project Area would generally only be utilised in the event of an emergency, excluding the southern access on Baldon Road which may be utilised by workers and local material deliveries (no major component deliveries) travelling to/from Moulamein (estimated up to 10 light vehicles per day). There will be no other regular vehicular access via the secondary accesses during construction or operation of the Project. As per mitigation measure T1 of the EIS (refer to Table 6-32 of the EIS) a Construction Traffic Management Plan (CTMP) will be prepared and implemented. The TMP will be prepared in consultation with TfNSW and relevant councils. The TMP would provide additional information regarding: • Traffic volumes, distribution and vehicle types • Identification of designated transport routes, access and delivery schedules • Consultation with neighbours and local authorities regarding heavy vehicle and OSOM deliveries • Identification of dilapidation reports to be prepared for roads used frequently by the Project. Dilapidation surveys will be completed for local roads if they are nominated as part of a haulage route (used by heavy vehicles).

Comments or issues raised	Proponent Response
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.	As per Section 3.3.10 of the EIS, the Project proposes an on-site workforce accommodation camp of sufficient size to accommodate the entire workforce at peak construction. The camp would be established prior to the commencement of key construction activities and would be operational for the full duration of each stage of the construction activities. Details of the on-site workforce accommodation camp provisions including bushfire risk, traffic impacts, stormwater drainage and provision of services (potable water supply, sewage management and electricity supply) are outlined in the response to DPHI Planning (Section 4.16). There would be approximately 35 full time equivalent workers during operations. As per mitigation measure SE1 of the EIS (refer to Table 6-27 of the EIS) a Community and Stakeholder Engagement Strategy (CSES) will: • Continue regular engagement with Councils. • Address concerns about potential environmental, amenity and safety impacts (e.g., traffic, noise, visual). • Develop accessible, adequate and responsive grievance and remedy mechanisms in the event of complaints. • Communicate workforce accommodation plans • Engage with accommodation providers to avoid negatively impacting on tourism opportunities and vulnerable populations who are utilising temporary accommodation. • Collaborate with local councils and other key regional economic or social development stakeholders to support regional economic and social development initiatives. • Engage with medical and emergency services about the scale, timing and workforce arrangements for the Project's construction phase.
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.	As per mitigation measure SE3 of the EIS (refer to Table 6-27 of the EIS) an Industry and Aboriginal Participation Plan (IAPP) will be established to achieve positive local employment and business outcomes for the community. The IAPP will include the following components: • Local Jobs and Training Program • Local Procurement Policy and Local Business Participation Program • Aboriginal Participation Plan • Workforce Management and Accommodation Plan

Comments or issues raised	Proponent Response
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.	A key aim of the Community and Stakeholder Engagement Strategy (CSES) is to facilitate open, transparent, timely and accessible communication of Project information with the aim of minimising uncertainty and addressing concerns. As per mitigation measure SE4 in Table 6-27 of the EIS, the Community Benefit Sharing Program, including Voluntary Planning Agreements, will be managed in partnership with the community and Murray River and Hay Shire Councils.
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.	Potential cumulative impacts are assessed in respect of each environmental aspect in Sections 6.1 through 7.4 of the EIS and with respect to other nearby project developments in Section 7.5 of the EIS. Furthermore, justification for the Project in terms of social benefit, ecologically sustainable development, strategic merit and alignment with government policy and legislation is evaluated in Chapter 8 of the EIS.

4.6 Edward River Council

Edward River Council provided a number of comments and recommendations which are summarised and addressed in Table 4-7. The nature of the issues raised by Edward River Council are primarily related to:

- Biodiversity impacts,
- Cultural heritage impacts,
- Visual and landscape impacts,
- Workforce accommodation and pressure on community resources, and
- Bushfire risk.

Table 4-7 Response to Edward River Council

Comments or issues raised	Response
Council has no objection to the proposed development and provides the following comments and advice for consideration during the assessment of the project:	In-principle support of ERC for the Baldon Wind Farm development is acknowledged.
Impacts on flora and fauna: Significant consideration should be given to the immediate, cumulative, and unknown impacts on existing habitats, corridors, and potential alienation; and the flow-on effects that extend beyond the Project footprint for all flora and fauna, especially Plains-wanderer.	Section 6.1 and Appendix F.1 (Biodiversity Development Assessment Report (BDAR)) of the EIS provide a comprehensive assessment of potential biodiversity impacts of the Project including direct, indirect, cumulative and unknown/uncertain impacts, serious and irreversible impacts (SAII), alienation, edge effects and habitat fragmentation. Proposed management and mitigation measures are also detailed including pre-clearance surveys, a Bird and Bat

Comments or issues raised	Response
	Adaptive Management Plan (BBAMP) and biodiversity offset strategy. An updated BDAR is provided in Appendix E of this Submissions Report. All shrubland and grassland vegetation in the Project Area can be assumed as habitat for Plains-wanderer, which are likely to range across the site as habitat structure changes with grazing and season. Avoidance based on habitat or recorded locations is not considered possible or warranted; approximately 2% of the habitat in the Project Area would be impacted which is considered to be a minor impact to its habitat. The species is only considered a SAI entity within the area mapped as Important Habitat as defined under the BAM. As the Development does not affect mapped Important Habitat for this species defined under the BAM, the species is not considered to be a SAI entity. However, an SAI assessment was still conducted based on the number of sightings of the species within the Project Area. Access tracks between turbine 83 and 84 have been removed to reduce fragmentation to an area adjacent to Plains Wanderer sightings. Strong and proactive mitigation seeks to achieve a net benefit for this species, set out in Section 9 of the updated BDAR (Appendix E), focussed on pest management. Mitigation measures for Plains-wanderer include: • Undertaking pre-clearance surveys for active breeding sites by an ecologist, ceasing works if detected and buffering any identified nest areas. • A Pest Animal Management Plan will be established to target pest animal species that impact Plains-wanderer (i.e. cats, foxes). • Potentially offering funding support for research into the potential indirect impacts of wind turbines to Plains-wanderer in the region, to understand the potential cumulative impact of other projects on this species in the REZ (refer to Section 9.2 of the BDAR). The BDAR concludes that, provided the recommended mitigation measures are implemented and required biodiversity offset credits are retired, the Project would not result in a significant impact to threatened flora or fauna, threatened ecological communities or MNES and is considered an acceptable risk to the environment. The BDAR was prepared in accordance with the NSW Planning Secretary's Environmental Assessment Requirements (SEARs), the NSW DPIE Biodiversity Assessment Method (BAM) 2020 and the NSW <i>Biodiversity Conservation Act 2016</i> (BC Act). An updated BDAR (Appendix E) has been prepared to address other submissions from the EIS exhibition, including from NSW Biodiversity, Conservation and Science Group

Comments or issues raised	Response
	(BCS) (refer Section 4.1) and community members (refer Section 5.3).
Presence of cultural heritage: Thorough consideration should be given to the presence and findings of significant Aboriginal Cultural Heritage items, including relics, artefacts and burial sites within the project and surrounding areas, and where these culturally significant areas extend into the Edward River area, including adequate consultation.	Section 6.2 and Appendix F.2 (Aboriginal Cultural Heritage Assessment Report (ACHAR)) of the EIS provide a comprehensive assessment of potential impacts to Aboriginal heritage including relics, artefacts and burial sites within the Project and surrounding areas. The EIS also outlines comprehensive mitigation measures for potential impacts to Aboriginal heritage including: • All sites identified in the Project area must be managed in accordance with the site specific mitigation and management recommendations provided in the ACHAR. • A Cultural Heritage Management Plan (CHMP) will be prepared to address the potential for finding additional Aboriginal stone artefacts and objects during the construction of the Project and for the management of known sites within the Development corridor in accordance with the ACHAR. Consultation with Aboriginal stakeholders was undertaken in accordance with Section 60 of the <i>National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2019</i> and <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW, 2010) including a field survey program with Registered Aboriginal Parties. An updated ACHAR (Appendix F.1) has been prepared to address other submissions in this Submissions Report including from Heritage NSW (refer Section 4.2).
Visual and landscape impact: The cumulative impact of the wind farm development and surrounding renewable projects should be thoroughly considered, having regard for the immediately affected landholders and the wider community.	Section 6.3 and Appendix F.3 (Landscape and Visual Impact Assessment) of the EIS provide a comprehensive assessment of potential impacts to the landscape character of the region and visual impacts as seen from affected properties, including assessment of potential cumulative impacts from surrounding wind farm developments.
Accommodation and community resources: Requests an accommodation camp during construction due to current housing shortages in the LGAs. Also requests appropriate siting and services design/assessment for the accommodation camp (e.g. flood and bushfire hazard detail).	As per Section 3.3.10 of the EIS, the Project proposes an on-site workforce accommodation camp of sufficient size to accommodate the entire workforce at peak construction. The camp would be established prior to the commencement of formal construction activities and would be operational for the full duration of the construction activities. An area near to the Sturt Hwy site entrance for siting the accommodation camp has been assessed as part of the EIS disturbance area. The EIS assessed potential flooding and bushfire impacts. Potential flood impacts affecting the proposed on-site workforce accommodation camp have been further reviewed as part of the updated quantitative Flood Study (Appendix G). Further details of the on-site workforce accommodation camp provisions including bushfire risk, traffic impacts,

Comments or issues raised	Response
	stormwater drainage and provision of services (potable water supply, sewage management and electricity supply) are outlined in the response to DPHI Planning (Section 4.16).
Bushfire: Site specific bushfire response plan warranted as risk of unmitigated fire outbreak is otherwise high.	A Bush Fire Emergency Management and Operations Plan (BFEMOP) will be prepared prior to the commencement of construction of the Project as per mitigation measure BF2 (Table 7-18) of the EIS. This will address the workforce accommodation camp and include details of the emergency evacuation procedures in the event of bushfire. The Sturt Highway is located approximately 200m to the north providing a nearby exit from the camp. Fire and Rescue NSW and NSW Rural Fire Service have been consulted during preparation of this Submissions Report (refer Section 3.2) and their EIS submissions are addressed at Section 4.13 and Section 4.14.

4.7 DCCEEW Water

The Water Group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) provided a number of comments and recommendations which are summarised and addressed in Table 4-8. The nature of the issues raised by DCCEEW Water are primarily related to:

- Ability to obtain a secure water supply for the Project including necessary licensing,
- Groundwater dewatering from excavations including necessary licensing,
- Setbacks from waterfront land, and
- Sewage management arrangements.

Baldon Wind Farm and NGH Consultants met with DCCEEW Water (online meeting 17 January 2025) to discuss the proposed approach to DCCEEW's advice relating to waterfront land. The meeting presented the challenges around defining waterfront land in the context of the Project's environmental setting and the Project flooding assessment (refer to Appendix D Engagement Records).

Appendix G provides a Flood Assessment prepared by BMT.

Table 4-8 Response to DCCEEW Water

Comments or issues raised	Response
Pre-determination: The proponent should clarify an ability to obtain a secure water supply for the Project. This is to include confirmation of relevant agreements where required and to demonstrate sufficient water entitlements can be acquired where necessary.	To show the feasibility of accessing the local groundwater resource within the Murrumbidgee Alluvium Water Resource Plan, a Water Access Licence (zero share) was applied for and subsequently granted by NSW DCCEEW on 30 April 2025 (reference no. 50AL514959, valid until 27 October 2025). The Project would secure an updated WAL and purchase sufficient temporary water entitlements on the water market for Project requirements prior to commencement of construction. The Project application includes the provision of four new groundwater bores as part of the options to supply construction water.

Comments or issues raised	Response
	As per Section 6.8.3 Water Use of the EIS, the Project would require up to 250 ML per annum during construction, sourced primarily from existing and proposed on-site bores and/or from Billabong Creek. This non-potable water would be sourced from a combination of surface water harvestable rights from associated landowners, bore water harvest rights and purchased on the open market from appropriately licensed water users pursuant to Lower Billabong Anabranch water source and Lower Murrumbidgee groundwater source regulations, or the regulations of any other water source accessed by private water contractors. If the full 250 ML per annum was to be extracted from the water source, this would equate to approximately: • 0.9% of the annual extraction limit for the Lower Murrumbidgee Shallow aquifer water source • 0.09% of the annual extraction limit for the Lower Murrumbidgee Deep aquifer water source Given the relatively small extraction amounts and temporary nature of the requirements, water use impacts from extraction are expected to be negligible as the proposed extraction volume is low in comparison to the water available. Hay Shire Council has also confirmed availability of treated potable water to support the Project potable water requirements. Baldon Wind Farm representatives have discussed the potential for buying the required water in the context of the local water markets with a water broker (Ruralco Water, February 2025) and confirmed that the water entitlements are readily available on the open market and that a suitable transaction would likely be readily achievable at the appropriate time prior to commencement of construction (refer Appendix D Engagement Records).
Pre-determination: The proponent should identify if excavations will intercept groundwater, and if they will, the maximum annual volume of water groundwater take due to these excavations should be quantified. The proponent should demonstrate that sufficient entitlement can be acquired in the relevant water source(s) to account for the maximum annual volume of groundwater take, unless an exemption applies.	As per section 6.8.2 (Groundwater environment) of the EIS, groundwater levels across the Project area are expected to be more than 10 m below ground level, based on drilled bore depths. This has been further substantiated by review of the <i>Lower Murrumbidgee Groundwater Sources Groundwater annual report 2022</i> (NSW DPE, 2022). Water level monitoring results from a representative sample of hydrographs from monitoring bores in the groundwater resource indicate that bores need to be drilled well beyond 10 m depth to reach a water bearing zone and the resulting standing groundwater levels are typically in excess of 10 m below ground level. WaterNSW Groundwater Work Summary Reports for four bores within or near the Project Area also support this conclusion (refer to Appendix K). Excavations for hardstands and wind turbine foundations to depths of approximately 3 – 5 m are not expected to intercept groundwater. This would be confirmed by geotechnical investigations prior to the commencement of construction, and water entitlements acquired if necessary.
Pre-determination: The proponent should review and amend project's infrastructure to	Consultation with DCCEE Water was undertaken on 17 January 2025. As demonstrated in that meeting, it is difficult to apply the

Comments or issues raised	Response
provide setbacks from waterfront land in accordance with the Guidelines for Controlled Activities.	standard definition of ‘waterfront land’ to the Project site. Therefore, setbacks in terms of the standard definition are not considered to be appropriate. The EIS included commitments to complete flood modelling to confirm low risk activities and mitigation measures that were readily feasible during detailed design to meet performance objectives. The results of the quantitative flood study (Appendix G) have since confirmed that the Project poses a low risk to local flooding and hydrology and the stability of waterways. Notwithstanding this, three turbines have been removed from the Project and one meteorological mast relocated to avoid high flood hazard areas (refer to Section 3.3). Whilst guidelines for setbacks may not be appropriate, the Project will adhere to the best practice guidelines for design and construction of infrastructure in areas of potential flood inundation. A more detailed response is provided in Appendix J.
Pre-determination: Confirm sewage management arrangements/agreements	Balranald Shire Council operates a wastewater and sewerage scheme within Balranald and Euston for sewerage disposal. Discussions were held with Balranald Council regarding the option to dispose of pumped effluent generated by the accommodation camp to the sewage system (in-person meeting during public info drop-in session 15 November 2024). It was more recently confirmed (phone call 19 February 2025) with discussions with Balranald Infrastructure and Asset manager that their system would have sufficient capacity to treat the wastewater generated by the accommodation camp at peak capacity. It is envisaged that this involves pumping out of the effluent from the accommodation camp and transfer to the wastewater system via licensed waste transport trucks.
Pre-determination: If the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). [Although a comprehensive groundwater study prior to determination is unnecessary given the perceived low level of risk, NSW DCCEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.]	Our understanding is that the NSW Aquifer Interference Policy relates to groundwater take from excavation dewatering but not from bores. Groundwater take from excavation dewatering is expected to be zero / less than 3 ML/annum as explained in this table above and at section 6.8.2 (Groundwater environment) of the EIS and will be confirmed by geotechnical studies prior to commencement of construction.

4.8 WaterNSW

WaterNSW provided several comments and recommendations which are summarised and addressed in Table 4-9.

Table 4-9 Response to WaterNSW

Comments or issues raised by WaterNSW	Proponent Response
The proposal is not located near any WaterNSW land, assets or infrastructure; therefore we have no particular comments or requirements regarding the proposal.	Noted.
Should the extraction of water from existing or new groundwater bores or water from other sources covered under the relevant water sharing plan be required, the proponent will need to apply for a Water Access Licence (WAL). Any such request will be assessed at time of application and are subject to availability.	Baldon Wind Farm understands this process for accessing regulated water resources and the associated constraints. Water availability for Project requirements is outlined at Section 6.8.3 of the EIS and further reviewed in response to DCCEEW Water's submission (refer to Section Table 4-8). To show the feasibility of accessing the local groundwater resource within the Murrumbidgee Alluvium Water Resource Plan, a Water Access Licence (zero share) was applied for and subsequently granted by NSW DCCEEW on 30 April 2025 (reference no. 50AL514959, valid until 27 October 2025).. The Project would secure an updated WAL and purchase sufficient temporary water entitlements on the water market for Project requirements prior to commencement of construction.

4.9 DPI Fisheries

The NSW Department of Primary Industries and Regional Development (DPI) Fisheries provided a number of comments and recommendations which are summarised and addressed in Table 4-10.

Table 4-10 Response to DPI Fisheries

Comments or issues raised	Response
<u>Recommended condition</u> : waterway crossings should be designed and constructed in accordance with DPI Fisheries Policy & Guideline document: Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013).	This is a commitment of the Project as per mitigation measure SW2 of the EIS and this Submissions Report (refer to Appendix C).
<u>Recommended condition</u> : riparian buffer zones should be established adjacent to areas of Key Fish Habitat in accordance with DPI Fisheries Policy & Guideline document: <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (Update 2013)	As per Table 6-43 of the EIS, The Forest Creek is the only watercourse within the Project Area defined as Key Fish Habitat. The Forest Creek traverses the south-eastern corner of the Project Area, but the Project's disturbance corridor is outside of the creek catchment and hence, inclusion of the condition may be extraneous to site circumstances.

4.10 Civil Aviation Safety Authority

The federal Civil Aviation Safety Authority (CASA) provided a number of comments and recommendations which are summarised and addressed in Table 4-11.

Table 4-11 Response to CASA

Comments or issues raised	Response
Contrary to Recommendation 9 of the AIA, CASA considers the proposed wind farm will be a hazard to aviation safety and recommends that the wind farm is obstacle lit with steady medium-low intensity red obstacle lighting.	Locations of the As-built locations of the turbines will be notified to Airservices Australia at least two weeks prior to wind farm construction (refer to Airservices Australia response at Section 4.11) and, where necessary, updated if there are any changes to locations or structure height during construction. Additionally, an Aviation obstacle lighting plan has been prepared (Appendix J). Obstacle lighting on a select number of wind turbines is proposed to be installed (and operate if required) for aviation safety purposes. Hay Shire Council were notified and wrote their support for the installation of this obstacle lighting on constructed wind turbines according to the lighting plan. The decision as to whether lighting is operated would be informed by consideration of the aviation safety risk assessment following mitigation and DPHI view on impact of the lighting for the surrounding community. The potential visual impacts of aviation obstacle lighting on nearby receivers have been assessed by the EIS LVIA. The lighting will be shielded from the view of any dwelling within 2 km in accordance with CASA regulations (<i>Part 139 (Aerodromes) Manual of Standards 2019</i>), unless otherwise agreed with associated landholders.
Consultation with local aerial application operators and marking of overhead transmission lines and/or supporting poles.	Feedback on the additional recommendation to follow standards outlined in the AS 3891.2:2018 and AS 3891.2 will be adopted in the detailed design phase of the Project, prior to operations.
The impacts on air routes W762 and H247 lowest safe altitudes (LSALT) are covered in Aviation Impact Assessment Section 5 Consultation, section 6.6, section 6.6.1, and Section 10 Conclusions but not specifically included in Section 11 Recommendations. The proponent (or the proponent's Aviation Consultant) should engage with Airservices Australia regarding the changes to the LSALTs, before the offending WTGs have been erected. (Airservices may need some lead time).	Feedback from CASA on the additional recommendation for engaging with Airservices Australia and Council as the aerodrome operator regarding the changes to the PANS-OPS and LSALTs will be adopted after the detailed design phase and well prior to the offending WTGs being erected. See Airservices Australia submission (Section 4.11) regarding changes to the LSALTs.

4.11 Airservices Australia

Airservices Australia provided a number of comments and recommendations which are summarised and addressed in Table 4-12.

Table 4-12 Response to Airservices Australia

Comments or issues raised by AirServices Australia	Proponent Response
With respect to procedures designed by Airservices in accordance with ICAO PANS-OPS and Document 9905, at the maximum height of 375.85m (1234ft) AHD, the wind farm will not affect any sector or circling altitude, nor any instrument approach or departure procedure at any aerodromes.	Noted.
The wind farm will affect the air routes W762 and H247. The maximum height of the wind farm without affecting air routes W762 and H247 varies with wind turbine location and elevation. The air routes will require amendment to an LSALT of 2300ft AHD to accommodate the wind farm. All amendments to airspace procedures are on a commercial basis. Please advise the Vertical Obstacle Data (VOD) team at VOD@airservicesaustralia.com of any need to increase Grid LSALT heights at least two (2) weeks before construction commencing by supplying the below information: • Approved wind turbine locations • Elevations at the top of the highest point of the turbine in metres AHD • A copy of AirServices email dated 22 May 2024	Amendments to the PANS-OPS and LSALTs will be adopted after further consultation with Airservices Australia and Council as the aerodrome operator the detailed design phase and prior to the offending WTGs being erected.
Communications/Navigation/Surveillance (CNS) Facilities: We have assessed the proposed activity to the above specified height for any impacts to Airservices Precision/Non-Precision Navigation Aids, Anemometers, HF/VHF/UHF Communications, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links and have no objections to it proceeding.	Noted.
Air Traffic Control (ATC) Operations: There are no additional instructions or concerns from our ATC.	Noted.
Vertical Obstacle Notification: This proposed wind farm is more than 30m (99ft) AGL. Please follow the below notification process: 1. Complete the Vertical Obstacle Notification Form: ATS-FORM-0085_Vertical_Obstruction_Data_Form.pdf (airservicesaustralia.com). 2. Submit completed form to: VOD@airservicesaustralia.com as soon as the development reaches the maximum height.	Reporting of tall structures (wind turbines and meteorological masts) will occur in accordance with requirements from Airservices Australia. • Two weeks prior to construction commencement • When met mast or WTG erection commences • As-built data once installed

4.12 Department of Defence

The Australian Department of Defence provided comment and the recommendation summarised and addressed in Table 4-13.

Table 4-13 Response to Defence

Comments or issues raised by Defence	Proponent Response
Recommended conditions - reporting of tall structures to Airservices Australia.	Reporting of tall structures will occur in accordance with requirements from Airservices Australia (see Table 4-12)

4.13 Fire and Rescue NSW

Fire and Rescue NSW provided a number of comments and recommendations which are summarised and addressed in Table 4-14. The nature of the issues raised by Fire and Rescue NSW are primarily related to:

- Fire hazard assessment,
- Provision of emergency services information including first responder's induction package, and
- Development of emergency response plans.

Baldon Wind Farm also consulted with Fire and Rescue NSW during preparation of the Submissions Report (phone call and email 11 December 2024) (refer to Appendix D) and the responses below reflect those discussions.

Table 4-14 Response to Fire and Rescue NSW

Comments or issues raised by FRNSW	Proponent Response
A Fire Safety Study (FSS) is developed in accordance with the requirements of <i>Hazardous Industry Planning Advisory Paper (HIPAP) No.21</i> and submitted to FRNSW for review. The FSS is to be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW. This includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). The FSS should be prepared consistent with the FRNSW <i>Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations</i> .	Prior to the commencement of construction, the Project will provide Fire & Rescue NSW (FRNSW) with a Fire Safety Study (FSS) based on final detailed design in accordance with the requirements of HIPAP No 21 and in consultation with FRNSW. The timing of the FSS was confirmed as appropriate by FRNSW during the additional consultation held during the RtS phase. The FSS will recognise risks and will develop methods to both minimise and manage the risk by identifying, prioritising, treating (dealing with), controlling and monitoring risk exposures, with an adherence to all regulatory guidelines. The Project will communicate directly with Area Command South Western Zone, the Local Emergency Management Committees of both Mid-Murray and Murrumbidgee Irrigation Area, aiming to develop an early, transparent and collaborative consultative mechanism that will help build productive relationships and ensure the safe and compliant delivery of the Project.
Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1	Prior to the commencement of commissioning, an Emergency Plan (EP) will be provided to FRNSW based on final detailed design in accordance with HIPAP No.1. GWA will present a project overview and assist key stakeholders and emergency personnel to understand of the scope of works, leading to collaborative discussions which propose to identify risks, controls and emergency situations, roles, responsibilities, resources available and additional requirements. This information will be used to eliminate or minimise health and safety risks arising during the scope of works and recorded in the Project specific Work Health and Safety Management Plan, Risk Register, and Emergency Response and Incident Management Plan.

Comments or issues raised by FRNSW	Proponent Response
Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – emergency services information package and tactical fire plans	At least 3 months prior to the commencement of commissioning, an Emergency Services Induction Package (ESIP) will be provided to FRNSW based on final detailed design in accordance with FRNSW fire safety guideline - emergency services information package and tactical fire plans.
Prior to occupation or commissioning an Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW. The package should inform first responders of site-specific features and safety measures to ensure they are able to undertake their duties effectively in accordance with agency specific Standard Operational Guidelines. The format of the Induction Package should be such that it can be readily shared across all agencies.	In engagement with FRNSW it has been discussed that we will provide an Emergency Responders Induction Package (ERIP) prior to the commencement of commissioning of the Project. The ERIP will be developed in consultation with FRNSW and key stakeholders – including the Area Command for South Western Area, NSW Ambulance, TfNSW, NSW SES, Fire Safety NSW, Murray River and Hay Shire Councils, local MIA and Mid-Murray area brigades from centres such as Hay and Moulamein as well as SafeWork NSW, and our specialist contractors. From this engagement, and ongoing liaison, the ERIP will be both informed, designed and shared across these and other appropriate agencies.

4.14 NSW Rural Fire Service

The NSW Rural Fire Service (RFS) provided two comments and recommendations which are summarised and addressed in Table 4-15. Baldon Wind Farm also met with NSW RFS to discuss these and other matters on 6 December 2024 and records of the meeting agenda are provided in Appendix D. The Project has agreed to provide NSW RFS with further project updates when Project development is more advanced.

Table 4-15 Response to RFS

Comments or issues raised by NSW RFS	Proponent Response
Asset Protection Zones must be provided around wind turbine and BESS structures and access roads must comply with the RFS guideline	This is a commitment of the Project as per Section 7.2.6 and mitigation measure BF1 of the EIS and this Submissions Report (refer to Appendix C).
A Bush Fire Emergency Management and Operations Plan must be prepared and shall be provided to the local Emergency Management Committee for their information prior to the occupation of the facility.	This is a commitment of the Project as per Section 7.2.6 and mitigation measure BF2 of the EIS and this Submissions Report (refer to Appendix C). The Plan will be provided to the LEMC for their information prior to occupation of the wind farm.

4.15 DPI Agriculture

The NSW Department of Primary Industries and Regional Development (DPI) Agriculture provided a number of comments and recommendations which are summarised and addressed in Table 4-8.

Table 4-16 Response to DPI Agriculture

Comments or issues raised by DPI Agriculture	Proponent Response
Any proposal for worker accommodation should include a Land Use Conflict Risk Assessment (LUCRA) undertaken to specifically justify the proposed	A LUCRA was prepared for the EIS (refer EIS Appendix F.7 Soils, Land and Agriculture Impact Assessment) including the on-site

Comments or issues raised by DPI Agriculture	Proponent Response
worker accommodation site. The development of extra dwellings on RU1 Primary Production zoned lands increases the potential for land use conflicts from ongoing agriculture and seasonal conditions on residents of such facilities.	workforce accommodation camp (refer Appendix 1 of the Soils, Land and Agriculture Impact Assessment). The assessment of impacts related to the presence of an accommodation camp has been undertaken via a Social Impact Assessment (SIA) as part of the EIS. All site personnel will be required to follow strict site policies while lodging at the accommodation camp, which will be a temporary facility. Impacts to agricultural enterprises on neighbouring properties are extremely unlikely to be experienced given personnel would be restricted to the accommodation camp area and the camp location is located over 3.3km to the nearest neighbour property boundary (and over 7km to the nearest neighbour dwelling). The accommodation camp location is supported by the host landowner and will have negligible impact on the host landowners' low density sheep grazing operation (typically 1 sheep per 2 ha of land). The temporary accommodation camp location will be rehabilitated after construction activities have been completed, returning the land suitable for grazing. Ongoing consultation with stakeholders will identify and address concerns if they arise.
Any subdivision of land should not result in any new dwelling entitlement	Subdivisions on the land may be required for Transmission Network Service Providers (e.g. Transgrid) for substation or switching stations or high voltage transmission easements and will not result in any new dwelling entitlement. The Accommodation facility is a temporary facility and does not require subdivision and will not be retained.
A specific agricultural biosecurity management plan should be developed with input from host and adjacent landholders and Local Land Services as outlined in the EIS Soils, Land Use and Agriculture Impact Assessment (Appendix 7, p55).	The Project Environmental Management Strategy (EMS), which will be prepared prior to construction based on the final detailed design, will incorporate the Biosecurity Management Plans provided by the host and in consultation with adjacent landholders, and the Local Land Services.

4.16 DPHI Planning

The NSW Department of Planning, Housing and Infrastructure (DPHI) provided three requests for additional information (RFI) during the Submissions Report preparation stage – two via the Major Projects Planning Portal on 10 December 2024 and 25 March 2025, and one by email on 2 April 2025. These RFIs are summarised and addressed in Table 4-17. The nature of the issues raised by DPHI are primarily related to:

10 December 2024 RFI:

- The proposed **workforce accommodation camp**:
 - Project description
 - Bushfire risk
 - Traffic
 - Hydrology
 - Visual impacts
 - Services (water, sewer and electricity)

- Off-site accommodation arrangements
- Biodiversity and heritage
- Permissibility; social impacts, noise assessment and air quality assessment.
- Consultation with government agencies
- Gypsum extraction and borrow pits: Project description and environmental assessment including potential traffic, flyrock, heritage and visual impacts
- An aviation obstacle lighting Plan, as per Civil Aviation Safety Authority (CASA)
- Submission of the biodiversity offset plan.

25 March 2025 RFI:

- Biodiversity assessment and reporting, including offsets
- Traffic and access - site access, transport routes and proposed road upgrades
- Visual impact assessment - confirmation of nearby dwellings
- Workforce accommodation details (as per 10 December 2024 DPHI RFI)
- Voluntary Planning Agreements, terms and value of
- Heritage items - confirmation of avoidance, impacts and proposed salvage works
- Water requirements for construction and firefighting purposes and water supply arrangements
- Request for figures showing Project refinements and an updated schedule of land for the Project
- Updated mitigation measures
- Request for figures including regional context, site layout, transport routes, road upgrades and site access points, and Aboriginal heritage items.

2 April 2025 RFI:

- Note regarding updates to the BAM-C biodiversity assessment method calculator since the EIS.

Table 4-17 Response to DPHI Planning

Comments or issues raised by DPHI Planning	Proponent Response
10 December 2024 RFI	
The Department requests further information on the proposed workforce accommodation. Please provide or confirm the below information. Project Description: a. General layout; b. Access arrangements (including emergency access); c. Amended construction schedule, including consideration of where the camp's construction workforce would reside;	a. As described at Section 3.3.10 and shown on the Site Layout drawing (Figure 1-2), the on-site workforce accommodation camp is proposed within the Project Area assessed by the EIS, approximately 200 m from the Sturt Highway within the site, providing easy access and evacuation. A detailed camp layout would be designed prior to construction (if the Project site accommodation camp option is pursued) and will consider Project staging. b. As per the Site Layout drawing (Figure 1-2), the primary access point to the Project area (including the on-site workforce accommodation camp) will be directly from the Sturt Highway. Secondary site accesses from Baldon Road in the south and east of the Project Area would generally only be utilised in the

Comments or issues raised by DPHI Planning	Proponent Response
d. Number of employees to be housed; and e. Ongoing use of camp or decommissioning strategy.	event of an emergency, excluding the southern access on Baldon Road which may be utilised by workers during operations (estimated up to 10 light vehicles per day) travelling to/from Moulamein and potentially local material deliveries (no major component deliveries) in the latter stages of construction when the wind farm roads have been suitably established. There will be no other regular vehicular access via the secondary accesses during construction or operation of the Project. c. The camp would be established prior to the commencement of construction activities (excluding any pre-commencement construction activities such as the site access intersection upgrade) and would be operational for the duration of the construction activities, subject to requirements. d. As per Section 3.3.10 of the EIS, the Project proposes an on-site workforce accommodation camp of sufficient size to accommodate the entire workforce at peak construction. The construction period is expected to be approximately 3.5 years, with the peak construction period expected to occur between months 9 to 24 (i.e. the peak construction period would be 15 months). A construction workforce of up to 400 full-time equivalent personnel would be on-site during the peak construction phase. The construction period would be nearer to 2 years for Stage 1, if it was developed in advance of Stage 2, with a shorter peak period for each stage accordingly. e. The camp would be progressively decommissioned at the completion of construction and commissioning and as on-site technician levels reduce in early operations phase. The land area would be rehabilitated or used for other requirements, as agreed with the landowner.
Bushfire Risk: a. Revised bushfire risk assessment; b. Emergency evacuation procedures; and c. Consideration of Bushfire Attack Level and construction requirement	a. The bushfire risk assessment considered all construction activities to be undertaken within the disturbance footprint which includes the accommodation camp. The accommodation camp would be located on a large hardstand which will be free of vegetation and would be safe from grass fire. No trees are present in the surrounding areas of the camp. As stated in Table 7-18 of the EIS, the Project would apply the relevant RFS planning guidance to the project including the appropriate Asset Protection Zones (APZ). b. An Emergency Response Plan will be prepared prior to the commencement of construction of the Project as per mitigation measure BF2 (Table 7-18) of the EIS. This will include details of the emergency evacuation procedures in the event of a bushfire. The Sturt Highway is located approximately 200m to the north providing a nearby exit from the camp via an all-weather gravel-capped access road should site evacuation be required. c. All structures which are established on site as part of the accommodation camp will comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas.

Comments or issues raised by DPHI Planning	Proponent Response
Traffic: a. Revised traffic scheduling; b. Parking availability; c. Confirmation proposed intersection upgrades remain adequate; d. Internal access roads; and e. Consideration of ‘ad hoc’ traffic movements associated with workforce (i.e. trips to nearby towns).	a. An updated Traffic Impact Assessment (TIA) (Appendix I) has assessed the potential impacts of Project traffic during peak hour including background traffic, cumulative traffic from other nearby major projects and workforce accommodation traffic. Project traffic generation and schedule assumptions are outlined in Section 4.2 of the updated TIA. The updated TIA has reviewed the Project EnergyConnect camp at Balranald vs. on-site accommodation (Section 4.2.2.2 of the updated TIA). The TIA originally assumed that the Balranald camp would be used, and the updated TIA confirms that this represents a conservative (worst-case) scenario for traffic generation. There is no impact to the required turn treatments / access design or any other elements of the analysis. b. The EIS assessed an area for the on-site workforce accommodation camp (refer to Figure 1-2 of this Scoping Report) that is sufficient for all parking requirements. All parking would be within the EIS construction footprint and no parking would be permitted along Sturt Hwy. c. Design of the site access intersection with Sturt Hwy (refer Appendix F of the updated TIA) has assumed the worst-case scenario for workforce accommodation traffic generation. Refer to a. above. d. Internal access roads are shown on the Site Layout drawing (Figure 1-2). As described at Section 3.3.7 (Project description) and 7.2.6 (bushfire assessment) of the EIS, internal access roads, including those to the on-site workforce accommodation camp, would be two-wheel drive, all-weather roads built to withstand Over Size Over Mass (OSOM) heavy vehicles, bushfire fighting tankers and fleet of concrete agitator trucks and other construction plant. The site roads would be suitable for workforce accommodation traffic that will be mainly entering and leaving site using less than 1 km of access tracks. e. The updated TIA has assessed the potential impacts of worst-case scenario peak-hour Project traffic including workforce accommodation traffic. Ad-hoc traffic movements associated with the workforce would occur outside peak traffic generation times and road network peak hours and therefore are not critical for the assessment.
Water: a. Restrictions to overland flow; and b. Water management system to avoid runoff.	a. A detailed Hydrology and Flooding Assessment has been completed for the Project as part of the Submissions Report (Appendix G) which includes a post-development scenario flooding assessment including for the accommodation camp location. The assessment concludes that <i>given the relatively low flood velocities across the site (and that these are not expected to change), no increases to erosion, siltation, or bank instability are expected.</i> Additionally, mitigation measure SW1 states that <i>during construction and operation of the Project appropriately designed erosion and sediment controls will be designed, installed and maintained in accordance with Managing Urban</i>

Comments or issues raised by DPHI Planning	Proponent Response
	<i>Stormwater: Soils and Construction Volume 1 (Landcom, 2004) and Volume 2 (DECC, 2008) (the 'Blue Book').</i> b. As per Section 7.4.4 of the EIS, wastewater from the accommodation camp would be collected and managed by a suitable on-site wastewater treatment and irrigation system or collected and disposed of by a licensed liquid waste contractor.
Visual impacts: Visual assessment from nearby receivers.	The EIS Landscape and Visual Impact Assessment (Appendix F.3 of the EIS) indicated the presence of the temporary accommodation camp within the Project description but did not assess the camp as the assessment was focussed on permanent infrastructure and its potential impacts. The closest non-associated dwelling to the proposed accommodation camp is located approximately 7 km to the north. The camp will be temporary for the duration of construction, after which it will be dismantled. The camp would be a low height, single level accommodation and limited to the Project development corridor. Given the temporary nature of the camp, its distance from the closest non-associated dwelling and low height in the landscape, potential visual impacts are considered to be negligible.
Services: a. Potable water supply; b. Sewage management; and c. Electricity supply.	a. As stated in Section 6.8.3 of the EIS, potable water would be trucked in from an appropriately licenced supplier and stored on site in tanks for use in amenities and drinking purposes. Hay Shire Council have provided in-principle agreement to supply the potable water requirements from their water treatment plant (email 7 March 2025, refer Appendix D). This may be supplemented by rain water tanks installed at the camp. An alternative which has been considered is sourcing water from a proposed groundwater bore and treatment via reverse osmosis. Bore yield and water quality would need to be better understood if this option was to be pursued. b. As indicated in the response to DCCEE Water (refer to Section 4.7), it is intended that wastewater generated from the accommodation camp would be transferred to the Balranald wastewater and sewage scheme via tanker. Discussions with Balranald Council confirmed the system has adequate capacity to manage wastewater generated at the peak of construction. c. As the accommodation camp is temporary, generators will be installed to provide electricity to the facility. These are typically supplied by the accommodation provider.
Off-site accommodation: a. Provide details of any agreements with third parties for the use of worker accommodation; and b. Provide details for the accommodation of the balance of the	a. There are no third-party agreements currently in place with third parties for the use of off-site workers accommodation. However, a quote has been obtained for the use of the existing camp at Balranald which holds a perpetual Development Approval for its operation. The accommodation camp provider would be selected as part of a tendering process, should an accommodation camp proceed on site. The camp would not be permitted to accommodate anyone that is not working or

Comments or issues raised by DPHI Planning	Proponent Response
peak construction workforce in nearby townships (if proposed).	associated with the project and all residents must have completed the mandatory site induction. b. As per Section 3.3.10 of the EIS, the Project proposes an on-site workforce accommodation camp of sufficient size to accommodate the entire workforce at peak construction (approx. 400 people).
Biodiversity and heritage: Confirmation of no additional direct impacts; and consideration of indirect impacts.	The development footprint which was adopted for the EIS biodiversity (BDAR) and cultural heritage (ACHAR) assessments included the footprint of the accommodation camp. Therefore potential direct and indirect biodiversity and heritage impacts of the accommodation camp have been assessed in the EIS and this Submissions Report including updated BDAR and ACHAR.
Other issues: a. Permissibility; b. Social impacts associated with local workforce being housed on-site (e.g. access to medical facilities, shops, etc); c. Updated noise assessment; and d. Updated air quality assessment.	a. Permissibility of the Project is outlined at Table 4-1 of the EIS. As electricity generating works in a non-residential zone, the Project is permissible with consent under the State Environmental Planning Policy (Transport and Infrastructure) 2021. The proposed temporary construction workforce accommodation is considered to be an ancillary use to the Project and therefore considered part of the Project in terms of permissibility. b. Potential social impacts associated with local workforce being housed on-site have been assessed in Table 6-26 of the EIS, as well as at Section 6.5.3 (traffic) and Section 7.4.4 (waste and resources). The on-site accommodation camp is considered a more efficient and lower regional impact than accommodating the construction work force at distant regional centres. A Community and Stakeholder Engagement Strategy will manage potential social impacts and be adaptive and updated as needed to respond to emerging community and stakeholder concerns. c. As per Table 6-39, the EIS assessed potential noise impacts of the proposed on-site workforce accommodation camp. The accommodation camp location is over 7km from the nearest non-associated residence (R05) and by its nature will need to provide for restful accommodation of the workforce, hence maintaining an appropriate noise amenity. d. The EIS assessed potential air quality impacts of relevant construction activities across the whole Project disturbance footprint including the workforce accommodation camp (refer Section 7.3.4 of the EIS). Dust generated by clearing and excavation activities and traffic using unsealed Project roads are the main air quality concerns associated with the accommodation camp and were assessed in the EIS.
Consultation: RFS, FRNSW, Council, TfNSW, Department's Water Group, NPWS, EPA, BCD.	Baldon Wind Farm met with NSW RFS, Fire & Rescue NSW, Hay Shire Council, Murray River Council, TfNSW, DCCEEW Water and BCS during preparation of this Submissions Report. Meeting minutes are provided in Appendix D. The respective agency written submissions have also been responded to in Chapter 4 of this Submissions Report.

Comments or issues raised by DPHI Planning	Proponent Response
	A submission from NSW EPA is addressed in Section 4.17 and NPWS did not provide any specific comments that required a Project response.
Gypsum extraction and borrow pits: The Department requests further information on the proposed onsite extraction of materials. Please confirm or provide the information below: a. Project life b. Limits on extraction and product transport c. Disturbance footprint d. Operating hours e. Infrastructure associated with the extraction f. Any traffic associated with transporting won materials g. Flyrock – an assessment of flyrock should be undertaken to determine whether there are adequate setbacks from publicly accessible areas and dwellings or whether additional measures are required to ensure public safety h. Heritage – an addendum ACHAR if the extraction areas area has not previously been assessed; and i. Visual – evidence that the extraction areas are not visible from any non-associated residences and impacts to publicly accessible areas such as road corridors.	a. The proposed recovery of gypsum would only be undertaken during the construction period of the wind farm. The gypsum would be used for the construction of roads and other hardstand areas. b. The gypsum deposit is located within the project area (Lot 57 DP 56555) and would not be transported off site. The surface deposit is approximately 50,000 m³. c. The locality of the gypsum extraction areas was included within the disturbance area. The approximate disturbance footprint of the deposit is 28 hectares. d. Extraction of the gypsum would only be undertaken within standard construction hours: 7 am to 6 pm – Monday to Friday 8am to 1pm Saturday e. Infrastructure required for the gypsum extraction involves a loader and screening equipment (to source appropriate size gravel) to place into the haulage trucks. f. The proposed gypsum extraction area is within the Project area. The EIS traffic assessment (Section 6.5 of the EIS) included traffic associated with transporting quarried material to and from the Project (refer Table 6-28 of the EIS). g. The location of the gypsum extraction area is remote from any residences or other public infrastructure which may be at risk of fly-rock. The nearest residence is 2.6 km away (and is uninhabited). The closest public road 13km away. It is therefore concluded that fly-rock does not pose a safety risk. h. The proposed gypsum extraction area has previously been assessed by the EIS ACHAR, including RAP consultation. i. The proposed gypsum extraction area is within the Project Area and the assessed Development Corridor. It is more than 3 km from the nearest boundary of the Project area and no tall infrastructure is proposed as part of extraction activities. Gypsum extraction activities would be indistinguishable from other construction activities. Therefore, no visual impacts to any non-associated residences or publicly accessible viewpoints are expected.
Prepare an aviation lighting Plan, as per Civil Aviation Safety Authority (CASA).	An Aviation obstacle lighting plan has been prepared (Appendix J) to address CASA and Hay Shire Council submissions. It incorporates feedback from consultation with Hay Shire Council (refer Appendix D). The potential visual impacts of aviation obstacle lighting on nearby receivers have been assessed by the EIS LVIA. The lighting will be fully shielded from the view of any dwelling within 2 km in accordance with CASA regulations (<i>Part 139 (Aerodromes) Manual of Standards 2019</i>), unless otherwise agreed with associated land holders.

Comments or issues raised by DPHI Planning	Proponent Response
Submission of the biodiversity offset plan.	The Biodiversity Offset Strategy (BOS) (intended to be part of the BDAR (Appendix F.1 of the EIS)) was accidentally omitted from the original EIS upload but later provided to BCS and DPHI by email 8 & 11 October 2024 respectively. An updated BOS is provided with this Submissions Report (Appendix E.2) to reflect updates to the BDAR since the EIS.
25 March 2025 RFI	
The Department is requesting that the following information is included in the Submissions Report or Amendment Report. Biodiversity - Noting the potential impacts to SAll entities, in particular the Plains-wanderer and Bindweed, please provide a commitment to additional avoidance and/or minimisation measures that could be considered by the Department in its assessment of biodiversity impacts. The Department expects a nature positive outcome in line with other recent assessments with impacts to SAll entities. - Use the template provided to provide a summary of the biodiversity impacts and offsets.	- Refer to Table 4-2 Responses to BCS advice – Biodiversity which addresses potential impacts to SAll entities including additional avoidance measures. - Refer to Chapter 11 of the updated BDAR (Appendix E) for comprehensive details of offset requirements, especially Table 11-1 to Table 11-4.
Traffic and access - Provide a clear and consolidated figure showing access routes for light, heavy and OSOM vehicles as well as site access points. - Provide details of all locations where road and/or intersection upgrade works are proposed on the public road network. This information should be supported by figures showing the location and extent of such works and an assessment of the impacts of those works, as well as evidence of agreement from the relevant road authority. - Use the template provided to provide a summary of the proposed road and intersection upgrades. - Ensure that the landowners consents are provided for all proposed road upgrades.	- Refer to Figure 11 of the updated TIA (Appendix I). - Refer to Section 9.2, Appendix E and Appendix F of the updated TIA (Appendix I) for a schedule of proposed road modifications and concept design drawings. Refer to Section 3.4, the updated BDAR (Appendix E) and Addendum ACHAR (Appendix F.2) for environmental assessment of these Project areas. - Refer to Section 9.2 of the updated TIA (Appendix I) for a schedule of proposed road modifications. - Land owner consents for all Project areas (refer Appendix A) will be provided to DPHI directly (considering they contain personal information of landholders).
Visual	Refer to Appendix M of this Submissions Report – Distances from dwellings to wind turbines, which shows tracked changes reflecting

Comments or issues raised by DPHI Planning	Proponent Response
Use the template provided to provide a consolidated spreadsheet of all receivers and their status (associated, non-associated and host) and the distance between each turbine for receivers within the black line, between the black and blue line and within 8km.	the wind turbines removed as part of the Project refinements (T12, T13, T88, T126, and T169) (refer Section 3.3). Apart from T12 (within 5,900 m of R06) and T13 (within 5,900 m of R13), the turbines removed are more than 5,900 m from the nearest dwelling. T88 and T126 are not within 8,000 m of any dwellings. The removal of these five turbines reduces the potential visual impacts of the Project, however, does not present a significant change to the outcomes of the Landscape and Visual Impact Assessment (LVIA) (Appendix F3 of the EIS). Given the marginal reduction in potential visual impacts posed by these Project refinements, visual impact ratings per dwelling are unlikely to be reduced to a lower category and the Project remains committed to maintaining any associated mitigation measures proposed by the EIS.
Workforce accommodation Include confirmation of a suitable workforce accommodation solution developed in consultation with Council(s). Please provide detail (including figures and GIS data) regarding: - The location of the proposed facility/facilities and their capacity - Assessment of the impacts associated with the construction and operation of the facility - The services and infrastructure that will be provided and how they will be managed. - Peak and average workforce volumes and duration of peak and overall construction period. - Any commitments to providing appropriate health and welfare services.	Refer to 10 December 2024 DPHI RFI response above for an extensive response to workforce accommodation queries, including the considerations flagged here.
Voluntary Planning Agreement Provide the terms of a VPA with Murray River Council and Hay Shire Council including proposed model for community benefit-sharing including an indication of the types and scale of benefit-sharing (including neighbourhood and local community benefits) and the estimated total value (financial amount or equivalent) of community benefits (both neighbourhood and local community benefits) that will be provided.	Refer to Table 5-5, Section 6.4.4 and Table 6-27 of the EIS for these details. The terms of the VPA will be developed further post Project planning approval.
Heritage Use the template provided to provide a consolidated summary of all Aboriginal and	Refer to Section 10.3 of the EIS Archaeological Technical Report (Appendix D of the EIS ACHAR) for a table of Aboriginal heritage items that the Project will avoid, minimise impacts or salvage.

Comments or issues raised by DPHI Planning	Proponent Response
Historic heritage items to avoid, minimise impacts or salvage.	Refer to Sections 7.1.2 and 7.1.3 of the EIS for historic heritage assessment, which confirms that two potential historic heritage items are avoided by the Project.
Aviation Noting CASA's advice, prepare an obstacle lighting plan and assess the visual impact on nearby receivers.	Refer to response to CASA (Section 4.10) which confirms that an Aviation obstacle lighting plan has been prepared (Appendix J) and the potential visual impacts of aviation obstacle lighting on nearby receivers have been assessed by the EIS LVIA. Mitigation measure AV2 has been updated to reflect the addition of aviation obstacle lighting (refer to Section 3.5 and Appendix C).
Water Quantify the water requirements for construction and for firefighting purposes and detail the proposed arrangements for obtaining water supply	Refer to DCCEE Water response (Section 4.7) (construction water) and EIS (Section 7.2.6) (firefighting water).
Amendment related details - Provide clear figures which show the detail of the amended project compared with the original application - Provide a separate updated project layout figure for the amended project - Provide all relevant updated GIS layers - Provide an updated consolidated schedule of land for all lots located within the amended project area.	- Refer to Figure 3-1 Baldon Wind Farm – Project refinements - Refer to Figure 1-2 Baldon Wind Farm general layout - All relevant GIS layers will be provided to DPHI as part of the Submissions Report lodgement. - Refer to Appendix A.
Mitigation measures Provide a revised summary of project mitigation measures. The revised summary must include measures that are specific and framed in such a way as to provide a clear commitment to the mitigation measures that will be implemented for the project.	Refer to Appendix C.
Figures including: - Regional context - Nearby SSD projects and status - REZ outline - Nearby towns and major roads (labelled) - LGA boundaries - Site layout 1 page overview of whole site, plus inset tiles as required for larger sites - Red line outline of the project site boundary	- Refer to Figure 1-1 Baldon Wind Farm location and regional setting - Refer to: - Figure 1-2 Baldon Wind Farm general layout - Figure 1-3 Baldon Wind Farm disturbance footprint, and - Figure 1-4 Baldon Wind Farm - nearby dwellings - Refer to: - Figure 3-2 Primary Project transport route – Port Adelaide to Project Area, and

Comments or issues raised by DPHI Planning	Proponent Response
c. Development corridor and indicative construction footprint d. Turbine locations, labelled e. Site access points f. Other project details including location of transmission lines, access tracks, accommodation, BESS, substations, compounds, quarries, temporary and permanent met masts, connection points to existing transmission g. Major nearby features including roads, waterways, national parks/reserves, towns labelled h. Associated, non-associated and host dwellings – labelled 3. Transport route a. Port to site route(s) b. Site access point c. LGA boundaries 4. Road upgrades and site access points a. Road upgrades b. intersection upgrades c. site access points d. distinguish between light, heavy, heavy vehicles requiring escort and high-risk heavy vehicles requiring escort access points and access routes e. identify any roads or access points not to be used 5. Aboriginal Heritage a. items, labelled with AHIMS number if available	- Figures 14, 15 and 16 of the updated TIA (Appendix I) for heavy vehicle and Over-Size-Over-Mass (OSOM) routes. 4. Refer to: - Figure 1-2 Baldon Wind Farm general layout for site accesses, - Appendix E and Appendix F of the updated TIA (Appendix I of this Submissions Report) for strategic design drawings of proposed road upgrades and site access intersection upgrades, respectively, and - Section 4.3 and Figure 11 of the updated TIA (Appendix I) showing the traffic distributions for each of the vehicle classifications. 5. Refer to Figure 2-9 and Figure 2-10 of the updated ACHAR – AHIMS sites within Project Area.
2 April 2025 RFI	
Noting that the Grey Snake (<i>Hemiaspis damelli</i>) is included in the BAM-C since October 2024.	This species was surveyed as part of the EIS BDAR surveys and has been included in the BAM C as part of the updated BDAR (Appendix E).

4.17 NSW EPA

The NSW Environment Protection Authority (EPA) provided two comments and recommendations which are summarised and addressed in Table 4-18.

Table 4-18 Response to EPA

Comments or issues raised by EPA	Proponent's Response
The EPA understands that the final project design will likely require micro-siting and height adjustments, which will affect the determination of noise criteria. The EPA recommends that prior to commencement of construction, a revised noise and vibration impact assessment is provided to demonstrate that the final design and final turbine selection is predicted to comply with noise criteria in the <i>Wind Energy: Noise Assessment Bulletin</i>. This information may be used to inform licence conditions, including but not limited to noise limits.	This is a commitment of the Project as per mitigation measure N3 and N4 of the EIS, and would likely be part of any micro-siting condition included with the Development Consent
The EPA notes the EIS indicates anticipated volumes of construction and decommissioning waste may exceed the capacity of local waste management facilities. As a result, the EPA recommends DPHI include a Condition of Consent for the Applicant to prepare and implement a Waste Management Plan to show that the waste will be directed to facilities that can lawfully accept it.	As per mitigation measure R1 of the EIS (refer Table 7-22 of the EIS), the Project would develop and implement a Waste Management Plan (WMP) to minimise waste impacts during construction and decommissioning, including but not limited to: • Identification of opportunities to avoid, reuse and recycle materials, in accordance with the NSW EPA waste hierarchy. • An objective to ensure that any use of local waste management facilities does not exhaust available capacity nor disadvantage the local community.

Subject to Consent being obtained, the proponent would apply to EPA for an Environment Protection Licence (EPL), consistent with the activities approved under the Consent and with the EPL application containing details relevant to the scope of the application, risks associated with the activities and their management as well as referencing POEO Act requirements. The issue of an EPL to the Project would also require the proponent to prepare a Pollution Incident Response Management Plan (PIRMP) and submit Annual Returns for the EPL.

4.18 DPHI Crown Lands

The Department of Planning, Housing and Infrastructure – Crown Lands provided a number of comments and recommendations which are summarised and addressed in Table 4-19.

Table 4-19 Response to DPHI Crown Lands

Comments or issues raised by DPHI Crown Lands	Proponent's Response
The EIS refers to an indicative physical layout and design in Figure 3.1. If any structures or access tracks are to be built or cable transmission lines are to traverse Crown Land or Crown Roads a licence will be required to authorise ongoing occupation. The Department may also need to consider the transfer of the affected Crown roads to the local Council.	The Project has already submitted a Crown Lands licence application on the 24 June 2024, but it wasn't able to be accepted until the Project has obtained development consent. Baldon Wind Farm will apply for a Crown Lands licence as a condition of approval.

4.19 NSW National Parks and Wildlife Service

NSW National Parks and Wildlife Service (NPWS) did not provide any specific comments that required a Project response.

4.20 NSW Mining, Exploration and Geoscience

NSW Mining, Exploration and Geoscience (MEG) did not provide any specific comments that required a Project response.

5 RESPONSE TO COMMUNITY AND ORGANISATION SUBMISSIONS

The submissions received from Community and Organisations have been categorised, grouped and addressed by issue, rather than on an individual or stakeholder basis, due to commonality of issues raised in multiple submissions and as consistent with *State Significant Development Guidelines – Preparing a Submissions Report* (DPHI, 2024). Five categories with collectively 36 sub-categories have been established for reviews of specific issues. In addition to the proponent responses to each issue reviewed, the proponent will also consider areas where changes to processes or project design and implementation may be beneficial to addressing the issues raised. Project changes following the EIS submission and exhibition stages are set out in Section 3.3.

5.1 The Project

Issues in this category relate to the Project (e.g. the site, the Project Area, the physical layout and design, key uses and activities, timing).

5.1.1 Support for the Project

Submissions: SE-74958466.

Issue Summary: The community member supports the Project on the basis of addressing climate change and the related natural hazard events, wind power being low-cost electricity generation technology, site suitability, positive visual impact, nil health effects and low embedded energy to construct wind farms.

Response: The declaration of support for the Project is acknowledged.

5.1.2 Decommissioning, responsibility for

Submissions: SE-74875461, SE-74918722, SE-74920459, SE-75304745, SE-75370980, SE-75431958, SE-75431971, SE-75432458, SE-75557745, SE-75589461, SE-75590959, SE-75606461, SE-75623228, SE-75635458, SE-75639471, SE-75644480, SE-75700710, SE-75716470.

Issue Summary: 18 submissions raised concern that the responsibility for decommissioning the wind farm is unclear and requests a detailed decommissioning plan including timeline and costs, and an associated bond. Requests for guarantees to be provided by the proponent including land rehabilitation and removal of underground infrastructure.

Proponent Response: The design life of the wind turbines at the Baldon Wind Farm is calculated to be 35 years from the beginning of operations. As discussed in Section 3.4.2 of the EIS, the decommissioning of the wind farm and its removal will be undertaken if refurbishment is considered not to be a viable option.

Decommissioning of the wind farm is the responsibility of the wind farm owner. Legally binding agreements are in place with the landowners which provide guarantees regarding decommissioning obligations of the wind farm owner. Planning consents for wind farms as issued by the DPHI include specific conditions which detail the wind farm owners' obligations in terms of decommissioning. Decommissioning obligations are typically included within "*Part B Specific Environmental Conditions*" of development consents issued by DPHI. Such conditions typically require that within 18 months of cessation of operations, the applicant is to rehabilitate the site. This typically includes removal of all infrastructure (unless otherwise agreed with the Planning Secretary), stabilisation of all landforms and rehabilitation of all areas of disturbance.

It is anticipated that the decommissioning process would take approximately two years and would be undertaken in accordance with an approved Decommissioning Environmental Management Plan. Decommissioning may be staged, similar to construction.

Decommissioning will involve the complete removal of all above ground infrastructure (for the stage or whole wind farm as applicable). Where parts of infrastructure are unable to be viably removed, such as wind turbine footings, reinstatement of minimum 0.5 m soil capping will be implemented. Buildings and substations which are owned by the Transmission Network Service Provider may need to remain as they can form beneficial

parts of the grid network that have an ongoing role. Access tracks and roads will be rehabilitated or will remain if requested by the landowner. Turbine footings and underground reticulation would not be completely removed and the viability of removal of these components would be considered closer to the time for decommissioning given the likely variation in relevant circumstances after a period of 35 years.

5.1.3 Questions about grid connection point and transmission capacity

Submissions: SE-75452713, SE-75590959, SE-75716470.

Issue Summary: Three Submissions questioned the Project's point of connection to the electricity grid and which high voltage transmission lines were proposed to be used, and suggested the Project won't be able to transmit all of its energy due to network capacity constraints.

Proponent Response: Section 3.3.3 of the EIS outlines the Project's proposed electrical connections, within the site and connection to the grid (National Electricity Market (NEM)). The Project would connect to one or both of the Darlington Point-Balranald 220 kV transmission line and the proposed Project EnergyConnect 330 kV line, subject to available capacity, accessibility and regulatory approval.

As described at section 3.4.1 of the EIS, the Project is likely to be constructed in two stages to account for timing of the connection option availabilities.

- Stage 1 would include the installation of 46 turbines (capacity 368 MW) – connected to 220kV line.
- Stage 2 would include the remaining 129 turbines (capacity 1,032 MW). Connection may be to Project EnergyConnect or a further transmission enhancement in the region.

For Stage 1, Baldon Wind Farm Pty Ltd has carried out energy yield modelling, market price modelling and coordinated with Transgrid to ensure that the Project is viable and would provide electricity to the grid that meets demand. The wind profile at Baldon is weighted towards generating more energy at night-time, when transmission lines tend to have more capacity (avoiding solar farm loads). The Project is modelled to generate approximately two-thirds of its energy during the night time (7 pm to 6 am). In addition, Baldon Wind Farm is coupled with a Battery Energy Storage System (BESS) to buffer transmission congestion and facilitate more flexible supply arrangements to better serve the likely NEM fluctuations.

Stage 2 of Baldon Wind Farm is likely to be dependent on both the commitment of NSW transmission upgrades and a successful access rights application awarded through a competitive tender process coordinated by AEMO Services. The initial allocation of 3.56 gigawatts of access rights for the South West REZ was awarded in April 2025, for which Baldon Wind Farm was unsuccessful. EnergyCo has advised that further investigations are underway to evaluate future upgrades to the REZ, including those identified in the Network Infrastructure Strategy for NSW prepared by EnergyCo on behalf of the NSW Government.

The three submitters statements do raise relevant concerns for developers of renewable energy that is urgently required for replacement of ageing coal plant and for offering clean energy solutions that can also deliver least cost energy. In the event that access to grid is substantially limited, then the scale of BWF development may need to be adjusted, however NSW demand for such projects is urgent and the proponent has developed a project description that can access the local wind energy resource and could in the right circumstances be a valuable contributor to future NSW energy supplies. The Stage 1 element of the Baldon Wind Farm has also been planned in a manner that it can connect to the existing 220 kV transmission infrastructure without the need to obtain access rights under the Access Scheme regime. NSW Government is aware of the critical need for strengthening grid systems and is directing substantial attention to the challenge.

5.2 Procedural matters

Issues in this category relate to procedural matters (e.g. level or quality of engagement, compliance with the SEARs, identification of relevant statutory requirements).

5.2.1 Associated landholders and neighbour agreements (determination of) and lack of community benefit sharing

Submissions: SE-75304745, SE-75453458, SE-75557737, SE-75557745, SE-75694960, SE-75700708

Issue Summary: 6 Submissions raised the concern that there are benefits only to those landowners and neighbours with agreements and no wider benefits to the community. Furthermore, any perceived benefits are short lived.

Proponent Response: The Project has in place two landowner agreements for the lands on which the wind farm will be developed. There are no neighbour agreements in place as there is no requirement for such based on environmental impact assessment. Further, the majority of near neighbours (including all those with houses within 8 km of a wind turbine) are host land owners to other wind farm development projects. However, neighbour agreements will be further considered as the Project approaches construction.

The Project has planned benefits, that positively add to the local and regional communities. These include financial benefits to participating landowners; financial community benefits through the project's proposed Community Benefit Scheme (CBS) endorsed by the Hay Shire and Murray River Councils.

These benefits include:

- A Voluntary Planning Agreement with each Council for managing funds.
- A Strategic Community Fund managed by a proposed Community Committee.
- A First Nations Fund focused on initiatives within 80km of the Project.

Further information of benefits is outlined in the EIS (page 28); and includes investment in local suppliers of materials and labour during the construction period, approximately 400 full-time equivalent jobs during the peak of the construction (some which may filled from the local area), and approximately 35 permanent skilled jobs for the life of the project where the operational staff are likely to be resident in the local region and provide income to local businesses.

5.2.2 Inadequate consultation and community views were ignored

Submissions: SE-75304745, SE-75430211, SE-75431964, SE-75557760.

Issue Summary: 4 Submissions expressed concern that the community had not been sufficiently consulted and that the Project does not have a social licence to operate due to the low amount of engagement with the local community.

Proponent Response: Community consultation was initiated in 2021 with the development of the Scoping Report and has continued throughout the development phases of the Project. Community consultation was undertaken with reference to the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, March 2024).

During the initial scoping phase nearby landowners were contacted directly via phone or email. A project website, phone number and feedback form were launched in 2021 to provide a platform for the wider community to engage with the Project. Two community information drop-in sessions were undertaken at the scoping stage.

During the development of the EIS a comprehensive consultation process was undertaken focused at engaging with both nearby neighbours and the wider community. Table 5-2 of the EIS provides a comprehensive overview of engagement activities undertaken. Key activities which were undertaken during the EIS development include:

- Six community drop-in sessions at locations within Hay, Moulamein and Balranald.
- Attendance at four community events providing attendees the opportunity to ask questions and receive information relating to the Project.
- Sponsorship of seven community events.

- Numerous media engagement activities including public notices in local papers, social media posts, project newsletters and direct electronic mail (to registered respondents).
- Engagement with Councils, community groups, Aboriginal groups, education providers, service providers and members of parliament (state and federal).

The Project continues to be proactive in engaging with the community and relevant stakeholders as the assessment of the Project continues. Drop-in sessions were undertaken in November 2024 in Balranald, Hay and Moulamein. More than 35 people attended the sessions representing a wide range of stakeholders from the local community. Feedback from these sessions was documented and will be referred to as the development of the Project continues.

Throughout the consultation process for the EIS and subsequent Response to Submissions process, the Baldon Wind Farm project has consistently received a high level of positive feedback from its stakeholders, including local government representatives, nearby landowners, residents, organisations and businesses. Our project team has engaged regularly and directly with shire councils, presenting comprehensive updates and addressing responses - activating valuable and progressive strategies to benefit the Project and the region.

As part of the EIS social impact assessment, the Project's targeted engagement measured a 72% positive response from local stakeholders. This survey outcome is a testament to the genuine engagement our project team has achieved, which supports us to be continuously alive to the values, attitudes and needs of the community.

Provided in Table 5-4 of the EIS is a summary of future engagement activities committed to by the Project for the construction and operational phases. The focus of these activities is to continue to build upon prior engagement activities and to encourage an increased involvement of the community with the Project.

The four submissions are acknowledged and the proponent states that it is committed to ongoing effective engagement but knows that it can be difficult to reach all community members. The engagement plan therefore incorporates a variety of mechanisms. Furthermore, the proponent believes that benefits from the development will flow to the broader community as has been the case for its other developments.

5.2.3 Community submissions are often distorted by personal grievances, unverified and do not view the proposal rationally

Submissions: SE-74918740

Issue Summary: One submission expressed concern objections to wind farm developments are motivated by personal grievances

Proponent Response: The NSW planning system provides the opportunity for stakeholders to put forward their views of a proposed development. All submissions are to be considered and appropriately responded to regardless to perceived motivations. The project team considers all community submissions and consider this as an opportunity to build on our stakeholder engagement strategy.

5.2.4 Modern Slavery concerns about the proponent

Submissions: SE-75589461

Issue Summary: One submission raised the concern that forced labour is used to manufacture wind turbines.

Proponent Response: GWA has an established Modern Slavery Statement which is implemented throughout our supply chains, operations and projects.

Our Modern Slavery Statement is found on our GWA website:

<https://modernslaveryregister.gov.au/statements/18079/>

5.3 Environmental, social and economic impacts of the Project

Issues in this category relate to the economic, environmental and social impacts of the Project (e.g. amenity, air, biodiversity, heritage).

5.3.1 Biodiversity impacts – vegetation clearing

Submissions: SE-75304745, SE-75371466, SE-75432465, SE-75506707, SE-75538477, SE-75557760, SE-75573970, SE-75577458, SE-75589459, SE-75589461, SE-75589708, SE-75590959, SE-75591472, SE-75606461, SE-75608707, SE-75625969, SE-75635458, SE-75639471, SE-75656960, SE-75700712, SE-75703209.

Issue Summary: 21 submissions expressed concern about vegetation clearing issue including 7 sub-issues:

- Impacts to Threatened Ecological Communities (TECs).
- Biodiversity and fauna habitat loss (other potential impacts to threatened fauna are reviewed at Section 5.3.2).
- Impacts to threatened flora species and communities.
- Habitat fragmentation and edge effect.
- Proposed wildlife corridors being ineffective for some fauna species.
- Potential cumulative impacts.
- Offsets being an insufficient mitigation measure – *offsets often fail to replicate the ecological functions of the original habitats and offsets do not always support the same species diversity or ecological processes as the impacted areas, leading to net biodiversity loss.*

Proponent Response: The issues raised by the 21 submissions are addressed below in respect of the seven sub-issues shown for the dot-points above. Additionally, NSW BCS provided specialist commentary on a range of the biodiversity matters and this Submissions Report respond to those at Section 4.1 and provides an updated BDAR (Appendix E) which incorporates additional survey results and updated assessments.

Summary

The EIS (Appendix F.1) included a comprehensive Biodiversity Development Assessment Report (BDAR) prepared in accordance with the NSW Planning Secretary's Environmental Assessment Requirements (SEARs), the NSW DPIE Biodiversity Assessment Method (BAM) 2020 and the NSW *Biodiversity Conservation Act 2016* (BC Act). Vegetation clearing impacts are assessed at Section 6.1.3 of the EIS and Section 8.1 of the BDAR. Potential impacts to flora and fauna are assessed in Chapter 8 and Chapter 10 of the BDAR and extensive mitigation and management measures are detailed in Chapter 9.

NSW BCS has also provided comments on the EIS (refer to Section 4.1) and as a result, this Submissions report provides Project refinements and updated mitigation measures that further avoid habitat impacts, as described at Section 3.3 and Section 3.5, respectively. An updated BDAR is provided in Appendix E.

The NSW BAM is highly prescriptive in the required survey and assessment methodology as well as options to offset the impacts of the Project that cannot be avoided or sufficiently minimised. It is endorsed by the Commonwealth for the assessment and offset of Commonwealth entities.

Impacts to Threatened Ecological Communities (TECs)

As described at Section 3.2.6 of the EIS BDAR, vegetation zones for Plant Community Types (PCTs) that are associated with a BC Act listed TEC have been assessed against the relevant scientific determinations. None of the associated PCTs met the scientific determination criteria for any of the listed TECs. As such, there are no BC Act TECs considered to be present within the Subject Land. The assessment is shown in Tables 3-12 to Table 3-16 of the EIS BDAR.

As described at Section 5.2 of the EIS BDAR, a habitat evaluation was undertaken to determine if EPBC Act listed TECs are likely to occur within the Subject Land. One TEC, *Natural Grasslands of the Murray Valley Plains*, was considered likely to occur within the Subject Land. This patch is located within the centre of the

Subject Land. The EPBC listed form of this TEC was subsequently confirmed by field survey (BAM plots) and covers 7.07 ha within the Subject Land, requiring assessment in respect of both the NSW BC Act and EPBC Act. The Project would directly remove approximately 1.12 ha of this community, or 16% of the community within the Subject Land. Such direct impacts to ecosystems or threatened species that cannot be avoided or mitigated would be offset with biodiversity credits.

Biodiversity and fauna habitat loss

The Project area is comprised of 46,259 ha of freehold rural land holdings, owned by two separate landholders, currently used for grazing of sheep at low stocking rates, with a previous history of irrigated agriculture, intensive grazing and associated native vegetation disturbance. Site selection for the Project means relatively minimal land clearing and tree removal is required to support wind farm infrastructure. The proposed Development Footprint (disturbance footprint) covers 819 ha or approximately 2% of the Project area (refer Figure 1-2, Figure 3-1, Figure 3-2 and Figure 3-3 of the EIS).

Project design measures that avoid and minimise potential impacts to flora biodiversity and fauna habitat are outlined in Section 7.1.3 of the EIS BDAR. Project refinements that further avoid habitat impacts have been adopted during preparation of this Submissions Report, as described at Section 3.3, Updated mitigation measures that further avoid habitat impacts have also been developed as part of this Submissions Report, as described at Section 3.5, and an updated BDAR is provided in Appendix E. Project design commitments to avoid biodiversity values include:

- Turbine locations will be microsituated around Little Eagle (*Hieraaetus morphnoides*) and Wedge Tail Eagle (*Aquila audax*) nests identified in the BDAR to provide a minimum 300 m buffer from turbines.
- No dams will be removed to minimise impacts to Southern Bell Frog (*Litoria raniformis*)
- Existing survey data for Mossgiel Daisy (*Brachyscome papillosa*) and Chariot Wheels (*Maireana cheelii*) will be utilised to minimise footprint in areas of core habitat, such as micrositeing for cabling routes or reducing track width.

Displacement of resident fauna and fauna habitat loss are assessed at Section 8.1 and Table 8-1 of the updated BDAR (Appendix E) and the potential for serious and irreversible impacts is assessed at Chapter 10.

As per Chapter 9 of the updated BDAR, measures proposed to mitigate biodiversity and fauna habitat loss include:

- Clearing of hollow bearing trees (HBTs) be timed to avoid critical life cycle events, such as breeding and nursing.
- Pre-clearing surveys and protocols for Plains-wanderer nesting sites
- Staged clearing procedures for HBTs, including the presence of a trained ecologist or licensed trained fauna spotter/catcher during clearing events.
- Clear physical demarcation of boundary between retained and cleared areas, including threatened flora habitat or aquatic areas.
- Relocation of habitat features (e.g. fallen timber, hollow logs etc) within construction footprint to adjacent retained habitat.
- Implementation of the Southern Bell Frog Adaptive Management Plan.

Impacts to ecosystems or threatened species that cannot be avoided or mitigated would be offset with biodiversity credits. The credits will be retired in accordance with the NSW Biodiversity Offset Scheme.

Impacts to threatened flora species and communities

Impacts to threatened flora species and communities and threatened flora habitat are assessed at Section 8.1 and Table 8-1 of the EIS BDAR. Threatened flora likely to be impacted by the Project includes: Mossgiel Daisy (*Brachyscome papillosa*), Bindweed (*Convolvulus tedmoorei*), Spike-rush (*Eleocharis obicis*), Chariot Wheels (*Maireana cheelii*) and Slender Darling Pea (*Swainsona murrayana*).

*Denotes threatened flora habitat.

The extensive survey effort undertaken to understand potential impacts to these species found that some are prolific within the Project Area. Opportunities to avoid core habitat areas and rehabilitate disturbed areas in order to protect these species in the long term form part of the Project's commitments.

As per Chapter 9 of the EIS BDAR, measures proposed to mitigate impacts on native vegetation include:

- Pre-construction surveys for Mossiel Daisy (*Brachyscome papillosa*) and Chariot Wheels (*Maireana cheelii*) to minimise footprint where possible in areas of core habitat, such as by micro siting for cabling trenches or minimising track widths.
- Pre-construction surveys within Project Area to identify 'hotspot' locations outside the Development footprint that could inform rehabilitation strategies.
- Clear physical demarcation of boundary between retained and cleared areas, including threatened flora habitat and riparian areas.
- Clearing protocols that identify vegetation to be retained, prevent inadvertent damage and reduce soil disturbance.
- Seed bank protection protocols, to protect threatened flora seedbank for natural recolonisation of areas subject to disturbance.
- Rehabilitation of disturbed areas as soon as practicable with consideration to native revegetation requirements.

The updated BDAR concludes that: *Provided the recommended mitigation measures are implemented and required biodiversity offset credits are retired, the Project would not result in a significant impact to threatened flora or fauna, threatened ecological communities or MNES and is considered an acceptable risk to the environment.*

Habitat fragmentation and edge effect (and proposed wildlife corridors being ineffective)

Indirect impacts including edge effects are identified at Section 8.2 of the EIS BDAR and impacts of development on habitat connectivity (fragmentation) are assessed at Section 8.3. The biodiversity assessment determined:

Existing movement opportunities for the majority of species within the Project Area will not be reduced by the linear and discrete nature of the wind farm Project. The loss of vegetation associated with the development footprint is unlikely to have an impact that could cause a decline to threatened species, with modification of their behaviour over time to move within the retained vegetation and across new tracks associated with the Project more likely.

Project design has been considered to minimise fragmentation. Access tracks have been designed to following existing farm tracks, roads or fence lines where possible to minimise track construction and new impacts required. Where there are no existing tracks, the minimum tracks necessary have been planned to access each wind turbine, so in some cases longer driving routes are required rather than cutting across intact vegetation. Electrical reticulation is in the form of underground cabling rather than overhead powerlines causing only temporary soil disturbance, to minimise permanent fragmentation.

Disturbed areas from track edges and underground cabling would be rehabilitated, including reapplying the topsoil and where required reseeded with native species representative of the mapped PCT to minimise permanent fragmentation. Revegetation measures would be detailed in the Biodiversity Management Plan (BMP).

Baldon Wind Farm has not proposed wildlife corridors as a mitigation measure to vegetation clearing.

While some impacts are unavoidable, the Project design has sought to minimise impacts and construction will continue to seek least impact and effective rehabilitation as well as effective offsetting to minimise biodiversity impacts.

Potential cumulative impacts

Section 8.4 of the EIS BDAR assesses potential cumulative impacts and Table 8-8 assesses potential cumulative impacts from other wind farm projects in the region. These potential impacts include vegetation clearing, construction and operational traffic generation and construction and operational noise.

The Biodiversity Assessment Method (BAM) used to assess clearing impacts considers the landscape context of the Project and the rarity and risk factors for biodiversity entities at a catchment level. In this way, the Project's assessment of 'serious and irreversible' impacts and the candidate species returned for the Project reflect the cumulative clearing impacts of the State. The tool used to assess the impacts and calculate offset obligations is updated regularly to reflect increasing knowledge about species and threats.

Cumulative *benefits* for biodiversity are also likely to occur, including:

- Biodiversity management plans that accompany construction and operation of State Significant Developments will provide extensive weed and pest animal control.
- New biodiversity stewardship sites would protect biodiversity values in perpetuity.
- Greater scientific information is gained about the distribution and habitat preferences of local species identified in the extensive surveys accompanying these large projects.
- The renewable energy development is one of many Australian projects that will collectively contribute to combatting a 'Key Threatening Process', listed under the EPBC Act namely, "*Loss of climatic habitat caused by anthropogenic emissions of greenhouse gases*"

The Project also commits to management measures that address the potential cumulative impacts of other projects interacting with the Project.

Offsets being an ineffective mitigation measure

The EIS BDAR was prepared to meet the requirements of the BAM established under Section 6.7 of the NSW BC Act and was referred to BCS during exhibition of the EIS for review and comment. Advice was received from BCS and has been responded to in Section 4.1. As indicated in Section 4.1, an updated BDAR has been prepared and is appended to this Submissions Report (Appendix E).

Baldon Wind Farm has sought to avoid and/or minimise biodiversity impacts in the first instance as part of the design of the Project and has also allowed for offsetting of unavoidable biodiversity impacts. Designing a wind farm Project to occur where there are strong and reliable wind resources, minimise impacts on the community, minimise environmental impacts and work within engineering and operational constraints requires a careful balance. Whilst BWF has minimised biodiversity impacts through the design process, there will be some impacts that will be unavoidable for a feasible project and these will be offset to ensure that there is no net loss of biodiversity values in NSW.

BWF is committed to delivering a biodiversity offset strategy that meets the requirements of the NSW Biodiversity Offset Scheme and that appropriately compensates for the unavoidable loss of ecological values as a result of the Project.

The NSW Biodiversity Offset Scheme was established under the *Biodiversity Conservation Act 2016* and is governed by the Biodiversity, Conservation and Science Group (BCS) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). It uses a transparent, consistent and scientific approach to assess biodiversity values and offset impacts from developments and other projects with a significant impact on biodiversity. Impacts are offset with gains in biodiversity at stewardship sites with the aim of delivering no net loss to biodiversity.

Biodiversity stewardship sites help conserve equivalent habitat for native species and ecosystems. By setting up a biodiversity stewardship site, landholders can generate biodiversity credits that can be sold to fund the management of weeds, pest animals and fire, and ecological restoration. Biodiversity stewardship site agreements are established in perpetuity and registered on title.

BWF has sought to engage with local stakeholders to identify opportunities to maximise the local benefits of a biodiversity offset strategy. Baldon Wind Farm will endeavour to:

- Maximise opportunities for local landholders, land councils and First Nations organisations to participate in management actions with the stewardship site and to provide local training and skill sharing.
- Work with Nature Markets and Offsets Division to ensure managed grazing is allowable within the stewardship site, where appropriate.
- Work with Nature Markets and Offsets Division to coordinate the stewardship site with other South West Renewable Energy Zone projects, where appropriate.
- Maximise opportunities to build local capacity within local contractors to supply seed and plants that may assist to supply South West Renewable Energy Zone projects, in rehabilitation as well as in active management of stewardship sites.
- Plan for the rehabilitation requirements for this Project, including detailed forward planning and consideration of synergies with offset active management (seed collection during preclearing surveys, where appropriate).

To address unknown impacts and contribute to future understanding of Plains-wanderer within wind farm sites, and as an additional form of compensation for Project impacts which cannot be avoided, BWF are investigating the potential for post construction funding of research into Plains-wanderer. The funding would be aimed at supporting further research into the potential indirect impact of wind turbines to Plains-wanderer in the region. This research would ideally be coordinated by a relevant research body in line with the National Recovery Plan for the Plains-wanderer. If implemented, it would be highly beneficial not only to better understand and manage the potential impacts of this Project, but also the cumulative impact of other projects in the REZ on this species.

This will be in addition to BWF retiring the credits required to offset the impacts of the Project under the offset options available under the BC Act and Biodiversity Conservation Regulation including:

- Establishment of new Stewardship Sites (and subsequent retirement of credits) or by retiring credits from existing Stewardship Sites,
- Securing (purchasing) credits through the open credit market, and/or
- Paying into to the Biodiversity Conservation Fund (BCF).

BWF is actively consulting with landholders nearby the Project about the potential to establish Stewardship Sites for the purpose of generating suitable ecosystem and species credits to retire for the Project.

5.3.2 Biodiversity impacts – fauna impacts

Submissions: SE-74875461, SE-74875467, SE-75430211, SE-75506707, SE-75557745, SE-75589708, SE-75606461, SE-75608707, SE-75625969, SE-75635458, SE-75639471, SE-75656960, SE-75703209.

Issue Summary: 13 Submissions expressed concern about impacts to fauna including:

- Displacement of and impacts to threatened fauna species including Plains-wanderer, excluding:
 - Direct loss of habitat due to vegetation clearing associated with the development footprint, which is addressed at Section 5.3.1 of this report, and
 - Bird and bat deaths due to turbine operation (blade strike and barotrauma), which is addressed at Section 5.3.3.
- Construction noise and vibrations (including night works affecting nocturnal fauna).
- Operational wind farm noise (infrasound) and lighting impacts deterring wildlife.
- Water quality impacts (sedimentation).
- Increased ground temperatures (heat island effect) caused by wind farms.

Proponent Response:

Displacement of and impacts to threatened fauna species including Plains-wanderer

Targeted threatened fauna and flora surveys and habitat surveys were undertaken between August 2023 and December 2023. Eight threatened fauna species were detected within the Subject Land:

- Black-breasted Buzzard (*Hamirostra melanosternon*)
- Blue-winged Parrot (*Neophema chrysostoma*)
- Pink Cockatoo (*Lophochroa leadbeateri*)
- White fronted Chat (*Epthianura albifrons*)
- Plains-wanderer (*Pedionomus torquatus*)
- Southern Whiteface (*Aphelocephala leucopsis*)
- Southern Bell Frog (*Hieraaetus morphnoides*)
- Little Eagle (*Litoria raniformis*)

Potential impacts to flora and fauna are comprehensively assessed in Chapter 8 of the EIS BDAR. These include impacts which may displace fauna including construction noise impacts on adjacent habitat areas and potential vehicle strikes due to increased vehicle movement across the Development Corridor. Where feasible, design refinement has sought to minimise potential impacts. Key habitat features such as farm dams and Eagle nests have been considered in the Project design and mitigation measures that will accompany the detailed design phase, pending project approval, to minimise impacts to fauna habitat use. This has included the removal of two turbines near existing nests and will detail a 'micro siting' allowance for other nests. The potential for indirect impacts on the Plains Wanderer has been discussed at length with species experts, in the context of other regional projects where consideration was given to the presence of tall structures (and perching opportunities for predator species) displacing this species.

Based on the above, the ecosystem credit requirement for the Project has been defined in Table 12-1 of the EIS and the species credit requirement has been defined in Table 12-2. The credits will be retired in accordance with the NSW Biodiversity Offset Scheme.

Further assessment has been undertaken for threatened species that the BAM identifies are most at risk of serious and irreversible impacts (SAIL) in Chapter 10 of the EIS BDAR. This includes assessment of the Plains-wanderer. The assessment, completed in accordance with the SAIL principles of the BAM, concluded that provided the recommended mitigation measures are implemented and required biodiversity offset credits are retired the Project would not result in a significant impact to Plains-wanderer.

Extensive mitigation and management measures are detailed in Chapter 9 of the EIS BDAR to reduce the direct, indirect, and prescribed impacts to biodiversity, including potential displacement.

In addition to mitigation measures addressing direct impacts of vegetation clearing and habitat loss (discussed at Section 5.3.1 of this report), fauna species impact mitigation measures included:

- The Project was designed to avoid and minimise infrastructure near dams which contain habitat for Southern Bell Frog (*Litoria raniformis*). No dams would be removed by the proposal.
- Turbine micro-siting locations must remain at least 300m distance from Little Eagle (*Hieraaetus morphnoides*) nests and Wedge-tailed Eagle (*Aquila audax*) nests identified in the updated BDAR.
- The construction program would be staged, such that no areas of adjacent habitat would be impacted by construction noise for the full duration of the construction program.
- Potential vehicle strike risk would be mitigated by establishing designated tracks and parking areas prior to construction and imposing on-site speed limits for all project vehicles during construction and operation of the Project.
- Daily/seasonal timing of construction activities to reduce impacts of noise on adjacent habitat areas, such as avoiding night works except where strictly necessary, particularly during the breeding/calling season for the Southern Bell Frog.
- Construction lighting is to be minimised or avoided, where feasible. Lighting at construction compounds, concrete batching plants, substations and the accommodation camp will be designed and operated in accordance with AS4282-2019 *Control of the obtrusive effects of outdoor lighting*.

Mitigation measures for Plains-wanderer include:

- Undertaking pre-clearance surveys for active breeding sites by an ecologist, ceasing works if detected and establishing a 200 m buffer around the identified nest area.
- A Pest Animal Management Plan will also be established to target pest animal species that impact Plains-wanderer (i.e. cats, foxes).
- Potentially offering funding support for research into the potential indirect impacts of wind turbines to Plains-wanderer in the region, to understand the potential cumulative impact of all projects on this species in the REZ (refer to Section 9.2 of the BDAR).

The EIS BDAR concludes that, *“provided the recommended mitigation measures are implemented and required biodiversity offset credits are retired, the Project would not result in a significant impact to threatened flora or fauna, threatened ecological communities or MNES and is considered an acceptable risk to the environment.”*

Construction vibration impacts

The noise and vibration impact assessment completed as part of the EIS (Appendix F.6 of the EIS) identified that the main sources of construction vibration will be the vibratory roller operation during the construction of internal roads and hardstands. Typically, the distances required to achieve the construction vibration criteria (for residences and other human uses) are in the order of 20 m. At a distance of 100 m, vibration from these activities is unlikely to be detectable, although the work activity may be audible at that distance.

Operational wind farm noise (infrasound) and lighting impacts deterring wildlife

Noise pollution from wind turbine operation may lead to habitat avoidance for fauna species, particularly birds, due to the introduction of airborne low broadband sound which alters the natural acoustic environment (Teff-Seker, Berger-Tal, Lehnardt, & Teschner, 2022). Most of the research assessing wind turbine noise impacts on fauna relates to birds but does also include other fauna to some extent. Relevant research literature is cited in the updated BDAR (Appendix E, Section 8.2 Indirect Impacts) and applied with regard to potential interference with fauna calls.

Sound has been shown to affect narrow space / canopy dwelling bats more than open country foraging bat species, and the Project Area is habitat for open country foragers. Therefore, operational sound presents a lower risk of impacts (EIANZ European bat presentation, February 2024). Furthermore, the most sound is generated in windy conditions when there is typically less bird and bat activity. Adaptive management measures committed to include operational bird and bat utilisation surveys. No operational mitigation measures for wind turbine noise are considered warranted for other fauna.

Aviation obstacle lighting on a select number of wind turbines is proposed to be installed and operate if required for aviation safety purposes as per the response to CASA’s EIS submission (refer to Section 4.10). The proposed lighting plan includes shielding to reduce the downward component of obstacle lighting.

Water quality impacts (sedimentation)

As described at Section 6.8.2 of the EIS, the most significant surface water feature is Abercrombie Creek which passes through the middle of the Project area. This is an ephemeral creek that is predominantly dry except during significant periods of rainfall.

Forest Creek to the south-east also intersects the Project area, however the catchment’s area of influence is primarily to the south, outside of the proposed Project’s Disturbance corridor.

Throughout the site there are natural depressions including Gunyah Swamp that is located within the southern portion of the Project area, Rawley’s Lake and several unnamed watercourses (refer to Figure 6-29 of the EIS). All the natural water features on-site are ephemeral. The only permanent waterbodies on the site are man-made farm dams, which will not be disturbed by the Project.

Most of the historical irrigation canals present in the Project area were dry during EIS studies and none remain operational.

Potential water quality impacts are assessed at Section 6.8.3 of the EIS. Due to flat nature of the landscape, the risk of soil erosion from surface water flows is very low. A detailed Hydrology and Flooding Assessment has been completed for the Project as part of this Submissions Report (Appendix G). The assessment concludes that *given the relatively low flood velocities across the site (and that these are not expected to change), no increases to erosion, siltation, or bank instability are expected.*

The key mitigation measure applied during construction and operation of the Project will be the implementation of appropriately designed erosion and sediment controls (ESCs). ESCs will be designed, installed and maintained in accordance with *Managing Urban Stormwater: Soils and Construction Volume 1* (Landcom, 2004) and Volume 2 (DECC, 2008) (the 'Blue Book').

Soil and surface water impacts during operation would be very low subject to disturbed surfaces having been stabilised and revegetated. Vehicles will be restricted to the formed access tracks and no further soil disturbance or sedimentation risks are predicted. Erosion and sedimentation risk during operation will be controlled through the establishment of effective site stabilisation measures in relation to maintenance of access tracks, roadside drains, waterway crossings, wind turbine hardstands and other areas susceptible to erosion.

Standard storage and handling protocols will be adopted to prevent pollution by spills of fuels, chemicals, concrete washout and other materials used during construction and operation.

Additional safeguards and mitigation measures to protect water quality are outlined at Table 6-49 of the EIS and include:

- A Construction Soil and Water Management Plan (SWMP) including site specific progressive Erosion and Sediment Control Plan (ESCP) would be prepared, implemented and monitored during construction to minimise impacts to soil and surface water.
- Design and rehabilitation of works required within waterways will adhere to relevant guidelines.
- The SWMP would include staging works to minimise the extent of ground disturbance at any one time. Areas of disturbed soil would be rehabilitated promptly and progressively during construction.
- Following construction, all disturbed areas will be rehabilitated, reformed to provide stable landforms, topsoil reapplied and where required reseeding with native species, or other vegetation as agreed with the landowner and maintenance period to ensure satisfactory vegetation re-establishment.

Increased ground temperatures (heat island effect)

A single submission expressing concern about this potential impact cited an online journal article link that could not be followed and that could not be found by a wider internet search. The proponent is not aware of any credible evidence that wind farms like Baldon Wind Farm would create localised increases in ground temperatures that adversely affect temperature sensitive fauna species.

The proposed Development Footprint (disturbance footprint) covers approximately 2% of the Project area and is a linear, narrow layout. The base of wind turbines and shadow of the tower is often observed to provide shade and wind shelter for grazing stock and other opportunistic fauna.

5.3.3 Bird and bat deaths by blade strike and barotrauma, including potential cumulative impacts

Submissions: SE-75304745, SE-75332966, SE-75402974, SE-75506707, SE-75537471, SE-75589461, SE-75608707, SE-75646462, SE-75656960, SE-75703209, SE-75718710.

Issue Summary: 11 submissions expressed concern about bird and bat deaths by wind turbine blade strike and barotrauma, including potential cumulative impacts of nearby projects. One submission also expressed concern about scavenging risks posed by any carcasses on-site.

Proponent Response:

Bird and Bat strike at wind farm sites has been subject to a substantial amount of monitoring studies (in varied settings and with varying species present) and the accumulated results provide an improved basis for management of impacts. Management responses are developed based on specialist advice regarding the bird and bat species present at the location, the flight behaviour of species indicated to be present and, the likelihood of impact together with conservation status of the species and management options that are available and likely to be effective at mitigating the impact.

The biodiversity provisions of the Project SEARs include the requirement for:

An assessment of the likely impacts of the development on birds and bats, including blade strike, low pressure air zones at the blade tips (barotrauma), alteration to movement patterns, and cumulative impacts of other wind farms in the vicinity.

The risk of wind turbine strike during operation of the Project is assessed at Section 8.3.4 of the updated BDAR (Appendix E). The assessment was undertaken in accordance with NSW and Commonwealth government guidelines and industry best practice. This included:

- A Bird and Bat Utilisation Survey (BBUS) based on two years of baseline monitoring data (Appendix J.22 of the updated BDAR).
- Risk assessment modelling undertaken to ensure that turbine placements within the Project Area minimise blade strike risk (Appendix J.21 of the updated BDAR).
- A desktop risk assessment of the overall risk of a potential impact event on the local population of any species of concern known or likely to occur and identified species and groups of concern for targeted monitoring as part of a Bird and Bat Adaptive Management Plan (BBAMP).

Whilst the majority of birds at the Subject land were common farmland and woodland species, eleven species of threatened birds and three species of threatened bats were identified during Bird and Bat Utilisation Surveys (BBUS) or associated incidental surveys.

Wind turbine blade strike risk for bird and bat species known or likely to occur is assessed in Table 8-7 of the updated BDAR (Appendix E), including migratory species. The risk assessment was completed by a specialist bird and bat ecologist and considered local populations, suitable foraging habitat, flying height and other factors. The assessment found that 8 species and 1 group have been assessed as having moderate risk and 5 species have been assessed as having a high risk. However, the consequence criteria for the NSW government draft Turbine Risk Assessment and Avoidance Guidance (used for the risk assessment) are based on national and statewide conservation status assessments rather than any direct consideration of impacts on local and regional populations. This approach is precautionary as it places potential impacts of the Project in the context of observed declines from all threats affecting the species. This approach fails for some endangered and critically endangered species such as those that are rarely recorded in the region and that are unlikely to occur within the Project Area, or a turbine collision being unlikely to occur such as the case with Plains-wanderer. Due to their high conservation status these species are automatically assigned to a high-risk category, which inappropriately directs attention towards impacts that are unlikely to eventuate (Nature Advisory, 2025 (Appendix J.21 of the updated BDAR)).

Cumulative impacts of wind turbine blade strike considering other proposed wind farms in the region are assessed at Section 8.4 of the updated BDAR.

A draft Bird and Bat Adaptive Management Plan (BBAMP) has been included in Appendix J.1 of the updated BDAR (Appendix E) and will be further developed in consultation with DCCEW and BCS to address the identified risk and inherent uncertainty in relation to the impacts to bird and bat populations, and to identify appropriate adaptive mitigation measures. The final BBAMP will reflect the final infrastructure layout and be implemented intensively for the first three years of operations with potential to scale down monitoring subject to results obtained in the first three years.

The draft BBAMP includes monitoring methodology, trigger mechanisms, an action response plan and reporting requirements, including annual provision of mortality search results to BCS and monitoring for

alienation effects around wind turbines. The BBAMP would also specify a carcass collection program to mitigate scavenging by birds of prey and feral animals or adjustments to be integrated based on pre-construction scavenging trials. Monthly carcass searching at a representative sample of turbines is typical for wind farms, plus incidental reporting by the site service teams. Turbine curtailment and intermittent operations during breeding seasons may need to be considered as potential mitigation responses if other measures are not effective, dependent on the risks identified from monitoring results. BBAMP monitoring reports (bat and bird collision rates including species) are made public under the Commonwealth project approval requirements.

One submission (SE-75506707) referred to the Project proposing to use bird and bat deterrents, such as ultraviolet lighting or acoustic devices. No such deterrents have been or are proposed.

Alienation impacts and barotrauma impacts are assessed at Section 6.1.5 of the EIS BDAR.

Whilst some species may be deterred from certain habitats as a potential impact arising from the operation of the wind farm, the particular habitat types found within the Project Area are abundant and widely distributed in the locality and as such, the level of risk of alienation impacts to bird and bat species arising from the wind farm operation is considered to be low, but if occurring, may reduce risk to such species by increasing the buffer between the wind farm and the species preferred habitat.

Recent studies found that there were few scenarios of movement near rotating blades in which the pressure changes would cause injury (barotrauma). The studies concluded that the majority of deaths of bats at wind farms are likely to be through collisions with turbines rather than from barotrauma. Refer to Section 6.1.5 of the EIS BDAR for references of these published scientific studies.

5.3.4 Contamination by Bisphenol A (BPA) or other unspecified WTG contaminant sources - soils, surface waters and groundwater

Submissions: SE-74875461, SE-75333213, SE-75356731, SE-75367723, SE-75402974, SE-75432458, SE-75432465, SE-75432468, SE-75557742, SE-75562002, SE-75577458, SE-75579208, SE-75579215, SE-75589459, SE-75606461, SE-75694960, SE-75700708, SE-75700710, SE-75718710

Issue Summary: 19 submissions raised concerns with the possibility of Bisphenol A (BPA) being shed from turbine blades, resulting in the contamination of soil, surface waters and groundwater and the potential for adverse health and environmental impacts.

Proponent Response: Wind turbine blades have a protective non-toxic coating which has been developed to protect the blades for their operational design life of approximately 30+ years. The physical condition of the turbine blades is monitored as part of the routine operations of the wind farm. Blades which are damaged, including any damage to the coating, would result in the blade being repaired or replaced.

There have been claims that wind turbines shed dangerous amounts of BPA resulting in contamination of the environment. These claims have not been verified through any peer reviewed scientific studies. Wind turbine blades contain only microscopic traces of residual BPA and therefore do not account for large, or any, emissions of BPA or microplastics to the environment (American Clean Power, 2023). BPA may arise in the environment from sources other than wind turbine equipment including many plastic products used as part of agricultural activities.

Wind turbine blades and all other associated componentry of the wind turbine complies with all applicable Australian Standards relating to hazardous materials.

5.3.5 Displacement of primary production

Submissions: SE-74875467, SE-75370734, SE-75370982, SE-75431971, SE-75432468, SE-75459208, SE-75557733, SE-75557760, SE-75576961, SE-75606457, SE-75644480, SE-75646462, SE-75718710.

Issue Summary: 13 Submissions expressed concern about the displacement of primary production land by the Project.

Proponent Response: To investigate impacts on land use, a Soils, Land and Agriculture Impact Assessment report was prepared by Mine Soils Pty Ltd on behalf of Baldon Wind Farm. It is summarised at Section 6.9 of the EIS and appended in full at Appendix F.7 of the EIS.

The Project area of 46,259 ha is currently used for grazing of sheep at low stocking rates (typically 1 sheep per 2 ha of land). The proposed Development Footprint (disturbance footprint) is 819 ha or approximately 2% of the Project area during construction, reducing to 349 ha (approximately 1%) during operation of the wind farm.

In their submission, NSW Department of Primary Industries (DPI) Agriculture summarised the issue, stating that: *“Although the proposal is likely to cause some disruptions to agriculture during the construction and operation phases, most impacts have been identified in the EIS and appropriate mitigation measures have been proposed relevant to agriculture. Although the project footprint may remove land from agricultural production, income diversification is expected to benefit the landowners. It is expected most of the project area will remain in productive agricultural land use throughout the project life.”*

In addition to comments by DPI, the landowner’s agricultural activity at the site would also benefit from improved all-weather access tracks and for some wind farms, hardstands at turbine sites are often used for the landowner’s temporary storage of feed or agricultural plant. Should fires cross the lands, local fire-fighting units would be able to use formed tracks for access and fire-fighting purposes.

5.3.6 Waste management at decommissioning, incl BESS

Submissions: SE-74920459, SE-75345233, SE-75370734, SE-75402974, SE-75431958, SE-75432462, SE-75537471, SE-75538477, SE-75557760, SE-75591472, SE-75646462, SE-75694960, SE-75716470.

Issue Summary: 13 Submissions expressed concern about waste management when decommissioning the Project, such as large waste volumes of waste occupying landfill and a lack of recycling options for wind farm components, including perceived hazardous or toxic waste streams.

Proponent Response: Responsibility for decommissioning (including the financial cost) is addressed in Section 5.1.2 of the EIS and describes how the Project owner is responsible for decommissioning and removing all above-ground infrastructure from the Project Area.

Waste management for the Project is assessed at Section 7.4 of the EIS and includes a review of local waste management and metal recycling facilities at Section 7.4.3 and a table of expected waste streams and their proposed management options at Table 7-21.

Apart from relatively minor quantities of grease, lubricating oils, coolant fluid and zinc paint which are used in typical quantities for an industrial development, decommissioning of the wind turbines would not generate any hazardous or toxic waste streams.

When compared to the major electricity generating methods employed in Australia, wind farms are favourable in terms of the potential to reuse and recycle component parts. Wind turbines and their components possess approximately 85 – 94 per cent recyclable materials (Clean Energy Council, 2023). Valuable materials such as steel, copper and aluminium will be segregated and recycled.

As per mitigation measure R1 of the EIS (refer Table 7-22 of the EIS), the Project would develop and implement a Waste Management Plan (WMP) to minimise waste impacts during decommissioning, including but not limited to:

- Identification of opportunities to avoid, reuse and recycle materials, in accordance with the NSW EPA waste hierarchy.
- An objective to ensure that any use of local waste management facilities does not exhaust available capacity nor disadvantage the local community.

The Project will also seek environmental performance measures as part of waste management contracts criteria, including fostering innovative opportunities for metal recycling and BESS recycling by collaboration with experienced industry partners.

Recycling of wind turbine blades is an area where continued technology research and industry development is required to identify a viable methodology. Few wind farms have been decommissioned in Australia to date and the relatively low volume of composite wind turbine blade waste to date, has made it difficult to establish a recycling industry catering specifically for wind turbine blade waste streams. The concentration of large-scale renewable energy infrastructure in the Renewable Energy Zones is expected to assist the development of options that improve efficiencies and viability of recycling options in a way which also benefits the regions.

Baldon Wind Farm will continue to work with industry partners and research facilities to assist in developing an end-of-life market for turbine blades. These opportunities may include the reuse of blade components which are repurposed for other uses, or processing of the blade polymer for use in other applications (e.g. concrete). Emerging opportunities will see the use of resins that can be separated from the other components allowing the materials to be reused in other applications more easily.

The proposed Goldwind BESS product will be accompanied by a sustainable decommissioning plan that outlines options for end-of-life recycling and environmentally responsible disposal, including:

- A waste inventory for all BESS components including identification of recyclable parts.
- Requirement that the appointed recycler is qualified to recycle the specific chemistry type and components.
- Technical product specifications (including electrolyte chemical composition) that will help guide battery recyclers to handle and recycle the BESS.
- Battery recycling via an accredited recycler with the Association for the Battery Recycling Industry (ABRI) if in Australia.
- Alignment with NSW EPA waste and product stewardship policies (*Waste Avoidance and Resource Recovery Act 2001*) and Commonwealth *Recycling and Waste Reduction Act 2020*.

The project would also collect batteries from project machinery and equipment, offices, power tools, and the like, to support the Moulamein Men's Shed annual battery recycling initiative, which uses the money raised to repopulate the local rivers with fish fingerlings.

5.3.7 Embodied energy means wind farms are a high environmental impact

Submissions: SE-74875461, SE-74875464, SE-75304745, SE-75402974, SE-75431961, SE-75589461, SE-75589708, SE-75644480, SE-75700710.

Issue Summary: Nine submissions expressed concern that the drain on natural resources to construct the Project has not been adequately assessed. Embodied energy in wind turbine manufacturing and wind farm construction such as mined minerals, concrete, steel, fibreglass and transport has not been considered in assessing and justifying the Project and, may render the Project counter to environmental sustainability. At least one submission requested to know the weight of a wind turbine blade and the total predicted CO₂ emissions of the Project.

Proponent Response: The Project has an anticipated operational lifespan of approximately 35 years, at which point key infrastructure may be refurbished and/or repowered (subject to approvals) or the Project would be decommissioned. Any materials recovered during decommissioning, can be considered a resource where reused or recycled.

The estimated amount of CO₂ emissions the Project would generate over its lifecycle is approximately 4,464 kilotonnes (based on the average lifecycle emissions for wind projects (26 tCO₂e/GWh) according to the World Nuclear Association (World Nuclear Association, 2011). The level of average lifecycle emissions is substantially less than many other forms of electricity generation and particularly much less than the coal fired power stations that renewable energy developments will replace.

The energy balance of a wind power plant shows the relationship between the energy requirement over the whole life cycle of the power plant (i.e. to manufacture, operate, service and dispose) versus the energy generated by the wind power plant. This energy payback period is measured in 'months to achieve payback', where the energy requirement for the life cycle of the power plant equals the energy it has produced. At this 'breakeven' point, wind turbines become energy neutral. The embodied energy in a wind turbine, that is, the

energy used in its manufacture, transport, erection and operation is generally paid back within 6-18 months of operation, based on Australian research (Haywood, 2020).

Alternatively, energy payback may be measured by ‘number of times payback’ – meaning, the amount of energy paid back to society versus the energy needed in the lifetime of that turbine. Over the life cycle of a wind power plant, it will typically return around 30 times more energy back to society than it consumed (Haywood, October 2020).

Meanwhile, during the last phase of the wind turbine lifecycle, the embodied energy during this phase is assumed as zero. While energy would still be used for the decommissioning of wind turbines, a large percentage of the wind turbine is recyclable (85 – 94 per cent (Clean Energy Council, 2023)), thereby offsetting the energy used during the last phase due to the environmental credits that it gains from recycling. In addition, new developments on waste management have demonstrated that glass fibre composites, commonly used in wind blades (which are approximately 30 tonnes each), can also be recycled and used to fabricate value-added high-performance composite (refer Section 5.3.6 Waste management at decommissioning, incl BESS).

5.3.8 Embodied energy - BESS

Submissions: SE-75644480.

Issue Summary: One submission expressed concern that embodied energy in BESS manufacturing is high and may render the Project counter to environmental sustainability.

Proponent Response: Lithium-ion batteries are a source of many valuable materials and if recycled, potentially 95 per cent of battery components can be recovered for alternative use or may even be turned into new batteries. While Australia currently only recycles a small portion of its lithium-ion battery waste due to it being a complex and costly process, the CSIRO is confident that lithium-ion batteries are highly recyclable and would be used to manufacture new batteries in the future as the demand for these batteries increases (CSIRO, 2019). AEMO (2015) predict strong growth in the consumption of Li-ion batteries for both electric vehicles and large-scale energy projects over the next 20 years and it is expected that recycling technology and recycling facilities will grow with this demand.

The BESS batteries would be disposed in accordance with the hazardous waste policies active at the time of decommissioning and recycling and reuse would be considered as a first option. The proposed BESS supplier, Goldwind Australia, is currently progressing to partner with a national industry leader for metals and battery recycling, allowing national coverage and an industry-leading, standardised approach for BESS component recycling at decommissioning stage. Goldwind’s primary battery cell supplier is also committed to low-carbon development, completing carbon footprint audits and certifications annually for both operational carbon emissions and product lifecycle carbon emissions.

5.3.9 Noise and vibration - amenity and health impacts, including cumulative impacts

Submissions: SE-74875461, SE-75304745, SE-75332969, SE-75333213, SE-75430211, SE-75431964, SE-75562002, SE-75579215, SE-75646459

Issue Summary: Nine submissions received noted their concerns over the impact of operational noise (including infrasound) to receivers, particularly regarding human health and sleep impacts.

Proponent Response: Wind farm operational noise for the Project has been designed, modelled and assessed to meet the required noise standards according to the NSW *Wind Energy: Noise Assessment Bulletin for State Significant Wind Energy Development* (DPE, 2016). This, along with proposed post construction noise tests, ensures that the Project will not have human health and sleep impacts for residents at known receptors during the operational phase of the Project. This is outlined in Section 6.7 of the EIS.

Infrasound is generally considered to be sound at frequencies less than 20 Hz and is often described as being inaudible. However, sound below 20 Hz can be audible provided that the sound level is sufficiently high. A common audibility threshold from the range of studies is an infrasound level of 85 dB(G) or greater.

Wind turbines being considered for the Project do not produce harmful low-frequency noise. There have been multiple scientifically peer reviewed studies into the potential health effects of wind farms. Each study has concluded that infrasound from wind farms does not result in disturbance and therefore are not a risk to human health. These studies have shown that low-level frequency is well below the threshold for human perception and health effects (Clean Energy Council, 2025). Furthermore, the National Health and Medical Research Council (NHMRC) which provides advice to the community and governments concluded that there is currently no consistent evidence that wind farms cause adverse health effects in humans (NHMRC, 2010).

The noise and vibration impact assessment (NVIA) considered sensitive receivers within a 16 km radius of the project area for both associated and non-associated receivers. The NVIA assessed all phases of the project including, construction, operation, decommissioning as well as traffic noise. The assessment also includes a cumulative impact assessment of other developments within a 20 km radius.

The following noise performance criteria was adopted for the NVIA:

- Construction noise predictions were made using the CONCAWE1 noise propagation model. This assessment provides noise predictions for CONCAWE Weather Category 6 (worst-case) noise-enhancing meteorological conditions.
- Environmental noise predictions for operation of the wind turbines were made using the ISO 9613-2:1996 “Acoustics — Attenuation of sound during propagation outdoors — Part 2: General method of calculation”
- Environmental noise predictions for operation of all other ancillary equipment has also been made using the CONCAWE noise propagation model.

The NVIA results conclude that there are no predicted exceedances of noise criteria at any non-associated dwelling for any phase of the Project. The assessment also considered low frequency noise and tonality.

The Project has committed to implementing an operational noise management plan inclusive of post construction testing at sensitive land uses, or representative locations to confirm the noise levels achieve the requirements predicted. Furthermore, revised noise modelling will be undertaken once the final equipment has been selected and referencing the relevant turbine noise specification.

5.3.10 Construction traffic impacts

Submissions: SE-74875461, SE-75304745, SE-75557730, SE-75579215, SE-75590959, SE-75703707.

Issue Summary: Six submissions expressed concern about potential impacts from construction traffic including:

- Request to know predicted heavy vehicle volumes and concerns about road dilapidation
- Construction traffic will disturb residents
- Increased traffic accidents
- The local road network is not adequate to support a project of this size
- Request that proposed traffic routes are complied with as per the project Traffic Management Plan (TMP): *That all traffic relating to the Project will only access the project via the Sturt Highway and the very southern portion of the Baldon Road from Moulamein, and do not use Keri East Road or the northern portion of Baldon Road. Such traffic would both affect the quality of life of our residences and cause disturbance to our livestock production.*

Proponent Response: The following provides the response to the issues raised by the community and also notes that the review of traffic management issues will be undertaken by TfNSW and Relevant Councils as the relevant road authorities and knowledgeable in the management of these issues.

The EIS and updated Traffic Impact Assessment (TIA) (Appendix I) assessed both construction and operational traffic impacts associated with the Project, including potential road safety impacts as required by the SEARs (refer to Section 1.2 of the updated TIA). Traffic generation will be highest during the peak of construction, including light vehicles, plant and equipment and delivery of turbine components. The TIA assessed the capacity of the road network to accommodate the increase in traffic associated with construction, assuming the worse case scenario in terms of the location of the workforce accommodation camp. The TIA concluded that the Sturt Highway and the intersection into the site would operate at appropriate levels for the duration of construction.

Section 4 of the TIA (Appendix I) provides extensive details of the expected vehicle types and number of vehicles generated by the Project during the peak and average construction periods, and the construction traffic distribution. The Project is expected to generate approximately 160 light vehicle and 92 heavy vehicle movements per day on average during construction, or up to 268 light vehicle and 146 heavy vehicle movements per day during the peak construction period as per Table 7 of the TIA.

It is anticipated that approximately 2,375 oversize and overmass (OSOM) vehicles would access the site during the 3.5-year construction period, and a draft delivery schedule is provided in Section 14 of the OSOM Route Study (Appendix H). The vehicles would be unloaded and kept to their smallest practicable dimensions when departing the site. The vehicles would arrive outside of the peak traffic periods and would be able to be accommodated on the road network subject to the road upgrades identified within the Route Assessment (Appendix H) and the adoption of suitable road management strategies which have been discussed in Section 8.8 of the TIA and would be confirmed as part of specific transport permits that would be applied for prior to construction.

As per the Site Layout drawing (Figure 1-2), the primary access point to the Project area (including the on-site workforce accommodation camp) will be directly from the Sturt Highway. Secondary site accesses from Baldon Road in the south and east of the Project Area would generally only be utilised in the event of an emergency, excluding the southern access on Baldon Road which may be utilised by workers and local material deliveries (no major component deliveries) travelling to/from Moulamein (estimated up to 10 light vehicles per day). There will be no other regular vehicular access via the secondary accesses during construction or operation of the Project.

Construction vehicles, especially heavy vehicles, would follow the State road networks from Port of Adelaide to the Project site (refer to Figure 14 of the TIA and the updated OSOM Route Study (Appendix H of this Submissions Report)) and, accordingly, the TIA concluded that the road network is able to readily accommodate the traffic generated by the Project during the construction, operation, and decommissioning periods.

Dilapidation surveys will be completed for local roads if they are nominated as part of a haulage route (used by heavy vehicles).

To minimise impacts to local road network and road users a Construction Traffic Management Plan (CTMP) is proposed to be developed in consultation with the local road authorities. The CTMP will detail specific management and mitigation measures to minimise impacts to road users and maintain road user safety.

The EIS Noise and Vibration Impact Assessment (NVIA) considered the impact to receivers due to the increase in road traffic. The assessment concluded that noise generated by increased traffic movements would be below the *NSW Road Noise Policy* at all non-associated dwellings.

Further details of potential construction traffic impacts are discussed in response to the Transport for NSW (Section 4.3) and Murray River Council (Section 4.5) submissions.

5.3.11 Turbine fires, risk of bushfire and emergency response to bushfire, including aerial firefighting will be restricted in and adjacent to the Project area

Submissions: SE-74920459, SE-75304745, SE-75430211, SE-75577461, SE-75645713, SE-75645713

Issue Summary: Six submissions expressed concern of the potential of turbines catching alight and the risk of this causing bushfires and risks to the community and property. The capacity of emergency services to manage such a fire event was also raised.

Proponent Response: There have been incidents where turbines have malfunctioned resulting in a turbine fire. However, the automatic shutdown and isolation procedures which are in place, makes this scenario highly unlikely to occur. The Australasian Fire and Emergency Services Council (AFAC) states that “*Wind farms are not expected to adversely affect fire behaviour, nor create major ignitions risks*” (AFAC, 2018). To avoid any impacts to aerial fire-fighting turbines are shut down as part of the standard emergency response procedures.

The project does not pose a high bushfire threat to the local area. The project has incorporated several mitigation measures into both the wind farm design and management measures. These include:

- Locating wind farm infrastructure on hardstands with Asset Protection Zones (APZs) established around the perimeter. A minimum width of 10m would be provided around the wind farm turbines, buildings, substation and BESS.
- Bush fire risks would be managed through standard mitigation strategies facilitated by an Emergency Response Plan developed in collaboration with NSW RFS and FRNSW, which would be in place prior to any commissioning of wind turbines.
- Water storage tanks would be installed within the operational footprint for fire-fighting and other non-potable water uses, with a 65mm Storz outlet, a metal valve and a minimum of 20,000 litres reserved for fire-fighting purposes. (Adequate non-potable water supply is outlined in the response to DCCEEW Water (Section 4.7)).
- Site access would comply with the requirements as set out in *NSW RFS Planning for Bush Fire Protection 2019*.

The Project has consulted with both Fire and Rescue NSW and NSW Rural Fire Service in preparing the response to submissions (refer Section 4.13 and 4.14). Consultation with the fire authorities will continue throughout the development of the project to ensure that appropriate requirements are adopted for the site’s future operation.

5.3.12 Fire risk related to BESS

Submissions: SE-75415747, SE-75431971, SE-75432462

Issue Summary: Three submissions stated that the presence of BESS within the project presents a fire risk

Response: BESS units are an increasingly necessary part of the energy system and are progressively being deployed more widely. As there have been some incidences of fire associated with BESS facilities, they require appropriate risk assessment and integrated management systems and procedures to reduce the fire risk. The proposed BESS equipment will have monitoring and fire suppression integrated and will be linked to 24/7 SCADA monitoring system that will have alerts for any out of specification operation.

The respective BESS cabinets each have:

- Comprehensive condition monitoring systems for temperature, smoke and flammable gas,
- Linkage of monitoring systems to Goldwind’s remote control centre operated 24/7
- an integrated cooling system which is specifically designed to maintain the cabinet in the optimal temperature range and minimise the risk of a thermal runaway event that may result in a battery unit fire.
- a fire suppression system that in the event of sensors in the cabinet indicating a fire, based on detection of both smoke and heat, will release fire suppressant aerosols for the purpose of cooling the BESS unit and limiting risk of spread of fire to other cabinets.

In addition to the systems integrated in the BESS equipment, operational procedures are developed to guide correct operation and maintenance of the BESS equipment to avoid risks of fire and to provide clear response measures should a fire risk occur.

The equipment would be imported and advice on use of these BESS units is that no fires have been experienced as yet from the operating BESS plant.

To minimise fire propagation at the individual turbine sites, between the individual BESS units and onto other adjacent infrastructure, the BESS configurations will follow the specified clearances required by the manufacturer and/or applicable standards. The BESS units will also be compliant with UL 9540A *Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems*.

The Preliminary Hazard Analysis (PHA) prepared for the EIS specifically considered the fire risk of the BESS (for both centralised and distributed layout options). As part of the PHA, a hazard identification process was undertaken, which identified 16 potential hazardous events, including a BESS fire. Based on the separation distances from the BESS units to the wind turbines and sensitive receptors it was concluded that a BESS unit fire is not expected to result in impact to the wind turbine or result in significant off-site impacts.

5.3.13 Wind farms provide limited employment opportunities

Submissions: SE-75579212, SE-75589461, SE-75591472

Issue Summary: Three respondents raised the issue that the project would not provide jobs for the local community and would only provide short term employment benefit.

Proponent Response: Throughout the early, planning, construction and operational phases of Baldon Wind Farm, social procurement and a focus on local training, learning/capacity building and project-direct and indirect employment for regional people, including Indigenous Australians, will be a focus. Through these distinct phases of the Baldon Wind Farm project, there are many services and supplies that will be sought from the Hay Shire and Murray River Council area and other shire catchments, which in turn, would boost employment and investment back into the community.

Therefore, the opportunities are far-reaching, including training, apprenticeships and employment through our sub-contractors, plus the long-term permanent jobs when the project reaches operational phase. This presents a varied outlook for local employment opportunities, while the project's need for supplies will positively reverberate throughout the region which in turn, creates jobs and boosts economic growth.

The operation of the wind farm will require a team of service staff to maintain and operate the equipment. This would require up to 35 workers which would live locally and ideally be sourced locally also. Experience from similar projects at other locations has shown tangible benefits including local employment during all stages of the projects.

5.3.14 Aviation risks and aviation study is inadequate

Submissions: SE-75304745, SE-75430211

Issue Summary: Two submissions raised concerns regarding aviation safety risks

Proponent Response: An Aviation Impact Assessment has been prepared as part of the Project's Environmental Impact Statement. Authorities: CASA; Air Services Australia and the Department of Defence have reviewed this assessment and responded with comments but has overall deemed the aviation impact assessment acceptable.

Aviation obstacle lighting on a select number of wind turbines is proposed to be installed (and operated if required) for aviation safety purposes. This Project refinement was made in response to CASA's submission (Section 4.10). An aviation obstacle lighting plan has been prepared (Appendix J) to address CASA and Hay Shire Council submissions. It incorporates feedback from consultation with Hay Shire Council.

5.3.15 Visual impacts including cumulative impacts

Submissions: SE-75304745, SE-75703707

Issue Summary: Two submissions raised concerns regarding visual impact to dwellings including the potential for cumulative impacts associated with other wind farms proposed in the South West Renewable Energy Zone.

Response: The Landscape and Visual Impact Assessment (LVIA) prepared as part of the Project EIS was developed in accordance with the *Wind Energy: Visual Assessment Bulletin 2016*. The LVIA provided a comprehensive assessment of existing landscape character, scenic quality and visibility of the Project.

Visual impacts were assessed for dwellings and public viewpoints, including potential cumulative impacts of other adjacent proposed wind farm developments. The assessment acknowledges that turbines will be visible from some dwellings and public areas. Of the non-associated dwellings, two were assessed as having a moderate impact, with other dwellings rated as having a low to negligible impact. For those dwellings rated as having a moderate impact, mitigation measures are proposed which includes landscaping in proximity to the dwelling to provide a visual screen for views toward the Project.

The Project is in the South West Renewable Energy Zone, where other wind farms are proposed in the locality. There are three proposed wind farms which are located within 8 km of the Baldon Wind Farm Project boundary. Within this area there are 11 dwellings within 8,000 m of the Baldon Wind Farm which are not associated with any of the three windfarms. The LVIA considered the cumulative impacts of these proposals as part of the assessment. The assessment found that six (6) of the 11 of the non-associated dwellings located within 8,000 m of the three wind farm projects are likely to have views of turbines in three (3) multiple 60 degree viewfield sectors. Existing vegetation may further reduce views from a number of these dwellings.

It was also concluded that the three windfarms may become a defining feature for road users travelling along the Sturt Highway due to the relatively flat topography. The LVIA does however note that the area is lacking in any areas of significant scenic landscape character which the wind farms may impact if it were present.

Mitigation measures proposed for those dwellings most impacted (specifically R13 and R24), visual screening will be offered to minimise the visual impacts. It is also important to note that based on current government announcements regarding the SW REZ, there is insufficient transmission line capacity available for all projects in the REZ to be connected into the electricity grid, therefore only a subset of projects within the REZ are expected to be developed over the coming decade, which in itself will reduce the potential for cumulative impacts to the community.

5.3.16 Landscape character impacts

Submissions: SE-75402974, SE-75431958, SE-75432462, SE-75557730, SE-75557745, SE-75579215, SE-75590959, SE-75623228, SE-75635458, SE-75639471

Issue Summary: Ten submissions expressed their concern that the installation of the wind turbines will distract from the natural beauty of the local area.

Proponent Response: A Landscape and Visual Impact Assessment (LVIA) was prepared for the EIS in accordance with the *Wind Energy: Visual Assessment Bulletin 2018* (the bulletin) (DPE, 2016). The LVIA included a public viewpoint analysis which assessed 13 public viewpoints within the study area at varying distances, up to 15 km from the windfarm. The viewpoints were carefully selected to be representative of the range of views of the proposed wind farm. Of the 13 locations, the wind farm was assessed as potentially being dominant in the visual catchment at two locations (located at St Pauls Rest Area) due to the proximity to the turbines. Turbines will not be visible from the closest town of Moulamein.

It is acknowledged that the placement of turbines will alter the existing landscape character of the area and the turbines will be visible at differing locations and distances. The viewer's response to the additional feature in the landscape is likely to be influenced by personal preferences and not all viewers are likely to find it an adverse impact. Overall, the LVIA concluded that views to key scenic landscapes features will not be impacted as the predominant character of the area is highly modified and of low scenic quality.

5.3.17 Workforce accommodation and community impacts to Moulamein

Submissions: SE-75557730, SE-75557745

Issue Summary: Two submissions expressed concerns that the influx of construction workers would have a negative social impact on the local community.

Proponent Response: Access to site is from the Sturt Hwy, and the on-site accommodation is scaled to accommodate the maximum (peak level) 400 construction staff within the Project Area. There is an existing accommodation camp located at Balranald which may also be utilised subject to availability. Hay Shire Council is also in the process of facilitating worker accommodation within the township, which has the potential to be utilised for the Project workforce.

Some construction staff may prefer to reside in either, Balranald or Hay rather than in onsite accommodation but travel times are likely to favour use of on-site accommodation.

The Project welcomes opportunities for local businesses to get involved and to also support the project directly or indirectly. There is limited accommodation currently available in Moulamein (e.g. Caravan Park, Pub and several short stay rentals). These are expected to benefit from the project although the primary site access is from the north via the Sturt Hwy. There are longer term opportunities during operations phase for operations staff and their families to reside in Moulamein, Hay or Balranald, which would be welcomed in the towns as confirmed through the community engagement.

The Project will consult with all relevant shire councils with regards to the location, planning and utilities and supply resourcing of the proposed workforce accommodation. Through this consultation, we will ensure our stakeholder and community engagement team plan ahead with regards to any potential impacts to residents, which would include traffic management and regular community updates. Our project team will prioritise this early engagement with council/s and the project's community consultation with regards to the establishment of a workforce accommodation camp. Positive impacts for the community have been identified, including a 'buy local' ethos which will have the potential to boost the local supply chain including small business – including suppliers of essential goods and food.

5.3.18 Aquatic impacts - sedimentation affecting local waterways and the Murray River

Submissions: SE-75718710.

Issue Summary: One Submission expressed concern about impacts to the aquatic environment in particular sedimentation affecting local waterways and the Murray River.

Proponent Response: The works will be undertaken with appropriate erosion and sediment control measures, typically under a Soil and Water Management Plan. Given the flat site terrain and generally low rainfall and runoff, management of erosion and sediment control is expected to be manageable by the civil works contractor. Effective rehabilitation will aim to stabilise disturbance areas as soon as practicably possible.

Please refer to Section 5.3.2 Biodiversity impacts – fauna impacts for further discussion of water quality impacts including sedimentation.

5.3.19 Contamination from BESS

Submissions: SE-75718710.

Issue Summary: One submission expressed concern about the potential for soil and water contamination from the proposed Battery Energy Storage System (BESS).

Proponent Response: Baldon Wind Farm would be monitored and maintained by local operations workforce, including being subject to a routine maintenance program in accordance with manufacturer recommendations. In the unlikely event of a leak from within a BESS unit or a BESS fire, it would lead to performance symptoms and be detected by integrated condition sensing equipment and the site operations team will receive alerts immediately. BESS battery cells are also housed in a weather-proof metal cabinet,

within shipping container framework located on a suitable foundation (or footings). Leak protection features of the proposed Goldwind BESS product include:

- Pressure testing for leakage detection during commissioning
- Compartmentalised battery units reducing any potential leakage volume.
- Each battery pack is designed to be water resistant (IP 67 rated) and will protect a leak inside the enclosure from entering a pack or cascading between packs.

In the very unlikely scenario of BESS fire, steps would be taken to manage the situation in a manner to contain any spills, leaks or contaminated fire-fighting water thereby minimising the potential for contamination to land and water, including thorough, post-incident clean up.

5.3.20 The Project should not be granted water access rights

Submissions: SE-75304745

Issue Summary: One submission raised the issue that if the Project was granted access to groundwater or aquifer this would affect regional access.

Proponent Response: Water needs will be greatest during construction (estimated at 250ML per annum, depending on weather conditions). This will decrease significantly during operations. It is anticipated that water requirements will be fulfilled through a combination of surface water and groundwater in accordance with the relevant water rules.

The Project is located within the Lower Murrumbidgee Groundwater Source (NSW DPIE, 2021). The Lower Murrumbidgee Groundwater Source consists of two aquifers known as the Lower Murrumbidgee Shallow and Lower Murrumbidgee Deep. If use of groundwater is progressed, this would be accessed via either existing or newly constructed bores.

To show the feasibility of accessing the local groundwater resource within the Murrumbidgee Alluvium Water Resource Plan, a Water Access Licence (zero share) was applied for and subsequently granted by NSW DCCEEW under the *Water Management Act 2000* on 30 April 2025 (reference no. 50AL514959, valid until 27 October 2025). The Project would secure an updated WAL and purchase sufficient temporary water entitlements on the water market for Project requirements prior to commencement of construction. As stated in Section 6.8.2 (page 269) of the EIS, if the full 250ML was sourced from the either aquifer, this would equate to approximately:

- 0.9% of the annual extraction limit for the Lower Murrumbidgee Shallow aquifer.
- 0.09% of the annual extraction limit for the Lower Murrumbidgee Deep aquifer water source.

Given the small percentage of annual extraction limit required for the construction period and the temporary construction activity, it is unlikely this would have a negative impact on regional access to groundwater resources.

5.4 Justification and evaluation of the Project

Issues in this category relate to justification and evaluation of the Project (e.g. consistency of Project with Government plans, policies or guidelines).

5.4.1 Wind power is expensive and obsolete technology

Submissions: SE-74920459, SE-74920468, SE-75370734, SE-75370734, SE-75402974, SE-75430211, SE-75431958, SE-75432458, SE-75557760, SE-75589461, SE-75590959, SE-75644480, SE-75646462, SE-75700708, SE-75700712, SE-75718710

Issue Summary: 16 submissions expressed the view that wind power was an expensive option to generate electricity. Submissions also stated that other forms of electricity generation were superior to wind energy and wind energy was an obsolete technology.

Proponent Response: BWF would have the ability to offset fossil fuel generated electricity available on the NEM at a market cost to the consumer. This is reflected in its competitive sell-down to investors launched in 2024 (AFR reference) as well as the Project's proven eligibility for government schemes designed for achieving the NSW and National net zero targets. This is also in line with independent industry studies.

The GenCost Report 2023-24 is a collaboration between CSIRO and AEMO which provides an annual update of the costs of electricity generation and storage. The report concludes that solar PV and wind generators are the lowest cost of all new-build technologies in 2023. The report forecasts that wind will continue to be the lowest cost through to 2030 (CSIRO, 2024). The report estimates that integration costs of variable renewables (solar and onshore wind) were between \$14/MWh to \$49 MWh which is significantly cheaper if compared with estimated cost of large scale nuclear at an estimated cost of \$163/MWh to \$264/MWh.

In the third quarter of 2024, wind generation hit a new record of 4,044 MW generation, which is up 21% year on year (AEMO, 2024). Wind combined with other renewables reached a milestone record in the same quarter providing an average renewable contribution of 35% and at one interval renewable potential exceeded 100% of the National Electricity Market's total supply requirement. Achieving very high levels of actual peak contribution of renewables, at times up to 100%, depends upon market responses to energy prices as well as essential system services needs, alongside the technical readiness to operate a secure and reliable power system without fossil fuels. AEMO's *Engineering Roadmap* is a body of work that aims to remove barriers to running a secure and reliable power system at times of very high renewable penetration.

A recent report issued by the Clean Energy Council detailed the impact to consumers power bills if renewable build capacity was reduced between the present day and 2030 (Jacobs, 2025). The report considered three scenarios which considered base case of reaching government targets, reduced renewable capacity, and reduced renewable capacity together with failure of large coal fired power station. The report concludes that a reduction in renewable build (compared to what is required to meet government targets for 2030) to 49 MW means that retail bills for a representative consumer will increase by 30-41 % in 2030 or an additional \$449 - \$606 per annum per household. A key consequence of a reduced renewable build in each scenario assessed in the report is that more gas must be burnt in gas generators, to provide enough electricity supply to meet demand. This gas comes at a significant additional cost.

According to the International Energy Agency (IEA) onshore wind is a mature technology and will be one of the main sources of power generation to achieve Net Zero Emissions by 2050. They note however that a significant increase in wind capacity up to 2030 is required in order to achieve this goal. The IEA in their review of wind power technology report that wind technology continues to improve focusing on increasing productivity and lowering costs. Wind technology innovation is focused on increasing the productivity of turbines, especially in areas with low wind conditions (International Energy Agency, 2024).

As indicated above, the 16 submitters have claimed that wind power is an expensive and obsolete form of generation, however, the proponent's provision of findings of 3rd party authorities shows why the claims are not substantiated. Indeed, if other forms of electricity generation were superior and cost effective, it is expected they would be actively pursued and would already be evident in the mix of generations options for development.

5.4.2 The Project won't provide reliable power (due to dependency on wind)

Submissions: SE-74920468, SE-75304745, SE-75370734, SE-75415747, SE-75430211, SE-75431958, SE-75431961, SE-75431964, SE-75431967, SE-75431971, SE-75432458, SE-75432468, SE-75557760, SE-75591472, SE-75635719, SE-75639471, SE-75644480, SE-75645713, SE-75646462, SE-75700710, SE-75700712

Issue Summary: 21 submissions raised the issue of the unreliability of wind farms to produce electricity, particularly during times of low to no wind. Suggests that a base load power source is required to support our future energy needs.

Proponent Response:

Baldon Wind Farm investigations have been conducted for more than 4 years including wind data collection at multiple locations across the site. This wind data is analysed by engineers and checked by independent experts through a technical due diligence process to understand with precision the fluctuations in wind resource available at the site over various seasons, weather conditions and time of day. The wind farm is designed to ensure the WTG are mechanically suitable and the amount of renewable energy that will be dispatched to the grid is calculated and assessed for bankability by financiers. During times of low or no wind, WTG maintenance can be scheduled, and the grid network can rely on other sources of generation or energy storage options such as a Battery Energy Storage System (BESS) that forms part of the BWF proposal. By design, the Baldon Wind Farm can assist the Australian electricity grid to offset fossil fuel emissions and contribute to the energy transition to renewables. By incorporating decentralised BESS units at each WTG of the Project, smoothing of the generation profile can even be achieved at the single point of connection if desired by the project and market operators.

AEMO produce the Integrated System Plan (ISP) for the National Electricity Market (AEMO, 2024). The objective of the plan is to develop an Optimised Delivery Plan (ODP) to meet the NEM's power systems reliability and system needs. There are three scenarios assessed for the ODP, however each of these assume the decline in coal-fired power and progression to net zero by 2050. The ISP finds that the lowest-cost replacement is renewables, connected with transmission and distribution, firmed with storage, and backed up by gas-powered generation. In essence the combination of these elements can be structured to act as base load at times and to have the flexibility to accommodate fluctuations in either power demand or renewable energy source intermittency, potentially better than a less flexible base load power source alone.

The Australian Energy Market Commission (AEMC) is an independent body which provides energy policy advice to the Australian government. Activities of the AEMC are governed by the relevant national energy legislation and three core objectives. Integral to these objectives is to promote the efficient investment and operation of the electricity services to ensure the delivery of safe and reliable electricity to the consumer. In September 2023, the three core objectives were updated to include achieving targets of emission reduction. AEMC have recently published guidance on how the national energy objectives shape the decisions made to ensure reliability of energy (AEMC, 2024). Therefore, AEMC now consider renewable energy integral to the future energy security for the Nation.

5.4.3 Wind farms are not economically viable without subsidies

Submissions: SE-75370734, SE-75431971, SE-75639471, SE-75644480, SE-75646462, SE-75700710

Issue Summary: Six submissions raised the issue that wind farms are not viable due to their unreliable energy source without receiving subsidies from the government

Proponent Response: Wind Farms operate in the National Electricity Market (NEM) and compete with other generation sources in Australia, including through power purchase agreements directly with off-takers or other market mechanisms. Both the renewable sector and the fossil fuel industry are supported by Australian Government subsidies. In the case of Wind Farm subsidies, schemes from the Australian Government are part of Australia's broader strategy to achieve an ambitious target of 82% renewable energy by 2030. Apart from incentivising renewable energy development for the purpose of transitioning to a cleaner energy supply, the Government recognises the importance of attracting investment to renewable energy projects as a much needed replacement for retiring coal fired power stations to maintain electricity supply security and affordable pricing.

The longstanding support mechanism, the Renewable Energy Target (RET), under which projects sell renewable energy certificates, ends in 2030. The Federal government's Capacity Investment Scheme (CIS) replaces the RET and is available for Baldon Wind Farm to apply for. More information about the CIS is available at the following government link: <https://www.dcceew.gov.au/energy/renewable/capacity-investment-scheme>

5.4.4 The Project won't address climate change

Submissions: SE-74920468

Issue Summary: One submission expressed the view that the project would have no impact on effect on climate change.

Proponent Response: By tapping into the great wind resource on the Hay plains of NSW, low emissions electricity is generated that can replace power supplies from high emissions, traditional fossil fuel energy generation that would otherwise continue to release high levels of greenhouse gases into the atmosphere and contribute directly to climate change.. Not only will this transition directly assist reduction of climate change pressures, but also addresses the imminent phase out of the coal fired power stations. The Baldon Wind Farm will contribute to our nation's increasing amount of renewable energy technologies, in an electricity generation mix that will replace our society's reliance on fossil fuelled generation and provide clean energy and replacement power sources. Furthermore, while no single renewables project will resolve the challenges of combatting climate change, the collective contributions of a larger number of clean energy projects will reduce a proportion of greenhouse gas emissions from electricity generation and importantly emissions per MWh supplied, thereby supporting mitigation of the degree of climate change. To substantiate that climate change is driven by the use of fossil fuels, and that this change can be reduced by the positive impacts generated by renewables, we reference the: Clean Energy Council - the peak body for the clean energy industry in Australia, Fact sheet:

<https://cleanenergycouncil.org.au/for-consumers/fact-sheets/environmental-impacts-renewable-energy>

"Climate change, driven by the burning of coal, oil and gas, is the biggest threat to Australia's biodiversity and clean energy is the best solution to reduce emissions. Renewable energy projects reduce pollution, increase biodiversity and result in cleaner water."

5.5 Beyond the scope of the Project or not relevant to the Project

Issues in this category are beyond the scope of the Baldon Project (e.g. broader policy issues) or in some cases, not relevant to the project.

5.5.1 Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat

Submissions: SE-75370734, SE-75431967, SE-7558946, SE-75591472, SE-75646462

Issue Summary: Five submissions raised concerns that the ownership of energy infrastructure by foreign entities posed a security threat to Australia.

Proponent Response: The Proponent of the Project is Baldon Wind Farm Pty Ltd which is a joint venture between Goldwind Capital (Australia) Pty Ltd and Omni Wind Pty Ltd. Each of these entities are Australian registered companies and are therefore bound to the state and federal company laws and regulations.

Currently there is no Australian manufacturing capability to meet the needs of future electricity infrastructure. The project is therefore dependent on international suppliers. In addition, in meeting the future electricity demands, Australia requires suppliers which can provide reliable and cost-effective products and the electricity system is subject to regulation of power projects. Australian Government also has regulatory processes for Foreign Investment Reviews and approvals. Goldwind Australia's operations must also comply with the *Security of Critical Infrastructure Act 2018*.

Goldwind has a proven track record in the development, construction and operation of wind farms across Australia and internationally and Goldwind Australia's projects are delivered using a range of employees from diverse cultural backgrounds.

5.5.2 Objects to the NSW Government's Energy Strategy and Climate Change Policy

Submissions: SE-75304745, SE-75557737, SE-75639471, SE-75646462, SE-75646462

Issue Summary: Five submissions expressed that they did not agree with NSW Government's policy on climate change including emission reduction targets.

Proponent Response: NSW Government policy on climate change and objective to reduce emissions is consistent with approaches by other Australian States and the Federal Government and reflects international trends for emissions reduction.

The Intergovernmental panel on climate change (IPCC) released its sixth regional fact sheet on Australasia in 2021 (IPCC, 2021). It reports that land temperatures in Australia have increased by 1.4 degrees since 1910 and relative sea level rose at a rate higher than global average in recent decades. The report also predicts more extreme weather events and warming ocean temperatures. The IPCC findings are being realised now and the question in relation to climate change is not whether it is occurring but to what extent changes will occur and the nature of eventual impacts. The CSIRO in a Federal Government Risk publication in the first decade of this Millenium stated that the less climate change is mitigated, the more costs will be for adaptation to the effects of Climate Change and this is also being evidenced.

In respect of NSW Government policy on climate change, it has been based on internationally accepted climate science and is aligned with the federal government climate policy. Australia is one of 200 signatories to the Paris Agreement which is a legally binding document. The collective aim of the Paris Agreement is to keep global temperature increases to no more than 1.5 degrees Celsius. To achieve this each signatory is obliged to submit emission reduction targets.

Government action in this area is demonstrating a proactive response to a significant global issue and it is necessary for as many governments as possible to support actions to transition to a sustainable energy future.

5.5.3 Additional transmission lines to connect wind farms are unnecessary environmental impact

Submissions: SE-75431971, SE-75506707, SE-75635719, SE-75644480

Issue Summary: Four submissions raised concerns regarding the additional environmental impacts associated with the development of new transmission lines.

Proponent Response: The transition to a sustainable energy future is not a simple task and requires substantial restructuring of the electricity supply system. Unfortunately, government delays over the last two decades in addressing the need for structural change have placed Australians in a position of needing to hastily implement a range of changes to the NEM structure. While challenging and costly to deliver the transition, to fail to restructure will expose Australians to greater risk from poorer supply security and higher power costs.

The reality is that new and/or upgraded transmission lines are required to improve electricity supply and reliability as well as allow for new renewable projects to connect to the NEM, often at different locations to the previous coal fired power stations. In recognising that challenge, governments have focused on implementing Renewable Energy Zones (REZ) and upgrading transmission networks to facilitate integration of projects within the defined REZ. This has provided some order to location of new transmission infrastructure and its planning and approval processes.

The Project proposes to connect directly into either or both of the existing Darlington Point-Balranald 220 kV transmission line and the proposed Project EnergyConnect 330 kV line (PEC) (subject to available capacity, accessibility and regulatory approval), both of which traverse the project site therefore reducing the need for additional transmission infrastructure. The Baldon Wind Farm includes the establishment of up to five internal step-up substations from which up to 33 km of overhead electricity lines are proposed to connect these substations to the point of connection to the Transgrid high-voltage network. These overhead lines have been considered as part of the EIS.

The development and construction of any new transmission lines are subject to route selection studies to identify the most acceptable route and the same level of environmental assessment as any other major projects in NSW. Baldon Wind Farm is not proposing any such transmission enhancement in the region to

support the Project. The Project EnergyConnect was declared as Critical State Significant Infrastructure (CSSI) in 2019 and was subject to its own assessment and approval in 2022. The Project is subject to regular independent environmental audits which are made publicly available.

5.5.4 Establishment of the REZ, and questions about the total intended capacity

Submissions: SE-75304745, SE-75644480

Issue Summary: Two submissions referenced the South-West REZ and were concerned with the lack of consultation prior to its establishment. Other concerns were regarding the over-prescribed capacity of the REZ.

Proponent Response: The purpose of Renewable Energy Zones (REZs) in NSW is to facilitate connection of multiple renewable energy projects and electricity storage, and to capitalise on economies of scale to deliver cheap, reliable, and clean electricity for homes and businesses in NSW. The SW REZ is one of five REZs identified by the NSW government. It is stated that the intended capacity of the REZ is to supply 2.5 GW. The Project intends to produce 1,400 MW which will be developed over two stages. This is well within the capacity of the REZ. However, it is acknowledged that multiple projects are seeking access to transmission infrastructure within the REZ and that the available capacity is likely to be less than the collective capacity of all proposals meaning that some may not proceed or may be deferred. Additional transmission infrastructure proposals have been considered by relevant authorities.

Consultation undertaken prior to the declaration of the REZ is not within the scope of the Project.

5.5.5 Australia's export of mining resources contributes to CO₂ emissions

Submissions: SE-74875461

Issue Summary: One Response is concerned that the export of resources overseas contributes to global CO₂ emissions.

Proponent Response: The submission is pointing to a 'double standard' effect whereby Australia is seeking reduced emission targets yet continues to operate a vigorous mining and resources industry focussed on export. However, the management of Australia's mining and resources industry is outside the influence of this Project.

6 UPDATED PROJECT JUSTIFICATION AND EVALUATION OF MERITS

Preparation of this Submissions Report follows public exhibition of the EIS and receipt of submissions setting a range of views from community and organisations and advice from government agencies (refer to Section 2.1). While a key focus of the Report is to provide DPHI with the Proponent's responses to the issues raised, it has also been possible to combine the Submissions Report preparation with allied tasks that update the engagement with relevant stakeholders, undertake additional studies and assessments and, consider Project refinements and mitigation measures in the context of the submissions received and matters needing to be addressed by the proponent. The submissions report therefore complements the EIS and provides the following benefits in accordance with the requirements of the *NSW State Significant Development Guidelines – preparing a submissions report* (DPHI, 2024):

- Additional engagement and consultation with government agencies including a detailed analysis of and response to agency advice received during the EIS exhibition period.
- Additional engagement with community members and other stakeholders, including a detailed analysis of and response to issues raised by submissions during the EIS exhibition period.
- Outlines Project refinements that address matters raised in government agency submissions, outcomes of additional environmental assessment and design review (refer to Section 3.3). The Project refinements fit within the limits set by the EIS Project description and do not change the fundamental consent application.
- Additional assessment of potential environmental and social impacts undertaken in response to government agency advice and in the context of the proposed Project refinements to reduce the level of uncertainty present in the EIS assessment.
- Reviewed and updated Project mitigation measures provided in Appendix C of the EIS, to address Project refinements, additional commitments made in response to government agency advice, additional assessments completed and general/editorial review of the EIS mitigation measures).

Following the Submissions Report process, a review of the Project justification as outlined in Chapter 8 of the EIS has been completed in Table 6-1.

The environmental assessment undertaken for the Project as part of the EIS and the additional assessment undertaken for the subsequent Project refinements as part of this Submissions Report, have concluded that the Project would not result in significant adverse impacts to the environmental, cultural, social and economic values. Any residual impacts can be appropriately controlled with the recommended mitigation measures. Furthermore, the project is consistent with the principles of Ecologically Sustainable Development and the objectives of the EP&A Act.

Table 6-1 Review of Project justification at EIS and Submissions Report Stages

EIS assessment (summary excerpt)	Submissions Report review
Project Objectives The objective of the Baldon Wind Farm Project is to generate and store renewable electricity for use throughout the State and beyond. The Project would: • Improve the security, stability and resilience of the NEM, while assisting the transition away from coal fired power generation,.	The Project Objectives described in the EIS are maintained following the Submissions Report process. While Project refinements include the removal of four wind turbines to avoid biodiversity values and high flood hazard areas, this change is considered to be within the limits set by the EIS Project description (which proposed up to 180 wind turbines). It is not considered a significant loss of energy to the National Electricity Market and the Project benefits are

EIS assessment (summary excerpt)	Submissions Report review
• Be located to contribute to the development of the South West Renewable Energy Zone, which enhances economies of scale efficiencies for new network infrastructure. As set out in the EIS, it is a Project that: • Is responsive to environmental, cultural and social values • Is conservative in its assessment of impacts and development of adaptive site-specific management strategies. • Proactively seeks opportunities to maximise Project benefits for the environment and to the surrounding communities.	comparable. The submissions report has strengthened these aspects based on additional studies, further consultation, project refinements and updated mitigation measures.
Responsive design and mitigation The Baldon Wind Farm has been designed in response to the detailed assessment of the site's values, in consultation with relevant stakeholders, including the local community. Key factors influencing the Project design, in order of importance, have included: • Aboriginal heritage • Biodiversity • Visual amenity • Local hydrology • Community values In addition to best practice design measures, the Project has adopted strong mitigation strategies to protect other site values, including: • Cultural heritage management planning, in consultation with Aboriginal community stakeholders. • Species-specific biodiversity mitigation strategies • Maximizing strategic biodiversity offset opportunities • Site specific rehabilitation strategy to reflect unique soil and floristic values and past experience on this site.	Responsive design and mitigation measures that protect site values as proposed in the EIS are maintained and strengthened, following the Submissions Report process. This Submissions Report has: • Responded further to environmental, cultural and social values by completing additional assessments that improve confidence in the EIS assessments and respond to government agency advice, including updated Aboriginal heritage (ACHAR), biodiversity (BDAR), traffic and flooding studies. • Addressed issues of concern raised by government agencies, community members and other stakeholders during the EIS exhibition period. • Made Project refinements that reduce the potential environmental and social (biodiversity, flooding and traffic) impacts of the Project. Project refinements (outlined in Section 3.3) include, but are not limited to, removal of three turbines to avoid high flood hazard areas and removal of two turbines to avoid biodiversity values • Updated the Project mitigation measures to address additional commitments made in response to government agency advice and the findings of additional assessments completed. The updated BDAR maintains species-specific biodiversity mitigation strategies and biodiversity offsets.
Alignment with government policies and statutory requirements As detailed in Section 2 of the EIS, the Project is in alignment with local, state and Australian government policies related to energy transition, including:	The proposed Project refinements fit within the limits set by the EIS Project description and do not change the fundamental development consent application. Development of this significant renewable energy generation and storage infrastructure aligns with government policies and statutory requirements and the

EIS assessment (summary excerpt)	Submissions Report review
• Australia’s climate reduction plan (2021) and Nationally Determined Contribution (2022) • Draft 2024 Integrated System Plan (ISP) • NSW Climate Change Policy Framework (2016) • NSW Net Zero Plan Stage 1: 2020 2030 (2020) and Implementation update (2022) • NSW Electricity Strategy (2019) • NSW Electricity Infrastructure Roadmap (2020) • Riverina Murray Regional Plan 2041 • <i>Climate Change (Net Zero Future) Act 2023</i> The Project has demonstrated it is permissible in Section 4 of the EIS. As a State Significant Development, the Project has been assessed in accordance with <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act). It is permissible in accordance with State Environmental Planning Policy (Transport and Infrastructure) 2021.	consistent objective is maintained following the Submissions Report process. Project permissibility (subject to consent being obtained) is unchanged.
Community views and benefits The engagement activities undertaken throughout the EIS phase demonstrated that there is a low level of concern and high levels of support for the Project. The concerns expressed were primarily focused on the limited local housing supply, interactions with the Victoria to NSW Interconnector West transmission route, potential flora and fauna impacts, potential cultural heritage impacts and potential visual amenity. At the local level, community benefits are planned to include: • Direct financial benefits to participating landowners • Direct financial community benefits through agreed Community Benefit Schemes (CBS) with the Hay Shire Council and Murray River Shire Council (refer to Section 2.8 of the EIS) • Investment in local suppliers of materials and labour during the construction period • Approximately 350-400 full-time equivalent jobs during the peak of the construction, and • Approximately 35 permanent skilled jobs for the life of the Project. Benefits will be maximised and social impacts managed under the framework provided by the: • Community and Stakeholder Engagement Strategy (CSES) • Industry and Aboriginal Participation Plan (IAPP) • Community Benefit Sharing Program (CBSP)	The community opinions and issues of concern identified during EIS engagement and consultation activities (Section 5 and 8.4 of the EIS) have been updated by the public submissions process and outlined in this Submissions Report (refer to Sections 2 and 5). Ongoing community engagement and consultation activities will continue following the Project’s determination by DPHI (pending approval), prior to and during construction. Community benefits and the frameworks proposed to deliver those benefits are unchanged following the EIS exhibition and during the Submissions Report process.
Scale and nature of impacts Key potential cumulative impacts centre on visual, noise, traffic, land use, biodiversity and socio-economic impacts. All are assessed as negligible adverse cumulative impact. Uncertainty has been addressed by building in conservatism and mechanisms to monitor and update assumptions.	This Submissions Report has provided additional assessment of potential environmental and social impacts that increases the level of confidence in the assessments that inform the determination of the Project. Additional studies completed include updated Aboriginal heritage (ACHAR), biodiversity

EIS assessment (summary excerpt)	Submissions Report review
	(BDAR), traffic and flooding studies. Each of these also provide an updated and improved assessment of potential cumulative impacts. Proposed Project refinements respond to matters raised in government agency submissions, outcomes of the additional environmental assessment and design review. The Project refinements and updated mitigations reduce the potential environmental and social (biodiversity, flooding and traffic) impacts of the Project.
Compliance and monitoring A consolidated set of mitigation measures that the Project is committed to is provided in Appendix C of the EIS. Pending Project approval, environmental protection and management measures would be implemented via an environmental management framework, including construction, operational and decommissioning Environmental Management Plans. These are listed at Table 8-2 of the EIS.	The Project mitigation measures have been updated to address Project refinements, additional assessments completed and general/editorial review of the EIS mitigation measures. (see Appendix C of this Submissions Report). The commitments are equally robust to those in the EIS. There is no reduction of mitigation measures and only strengthening of the measures with improved performance outcomes. This Submissions Report does not propose any change to the post-approval Environmental Management Plans committed to in the EIS.
Ecologically sustainable development The Project has considered and addressed the principles of Ecologically Sustainable Development (ESD), which involves the effective integration of social, economic and environmental considerations in decision-making processes. With reference to the Baldon Wind Farm Project: • The precautionary principle has been adopted in the assessment of impact; all potential impacts have been considered and measures have been included to address uncertainty. • Potential impacts have been assessed as likely to be localised and reversible and would not diminish options regarding land and resource uses and nature conservation available to future generations. • Impacts have been avoided where possible and specific mitigation strategies have been developed to ensure the site's values are projected for future generations. These primarily include important Aboriginal cultural heritage sites which will be managed in consultation with registered Aboriginal parties. • Long-term impacts of the Project have been considered, and the Project commitments ensure that natural resource use and pollution risks have been fully assessed and costs would be solely borne by the Applicant.	The principles of Ecologically Sustainable Development continue to be key drivers for the Project following the Submissions Report process. The Submissions Report process has strengthened the effective integration of social, economic and environmental considerations in decision-making processes related to the Project. Additional assessment of potential environmental and social impacts has reduced uncertainty and improved assessment of potential cumulative impacts. For example, the Project's water resource requirements have been more closely considered as part of the response to DCCEE Water (Section 4.7) and arrangement options being sought. Potential land use and Aboriginal heritage impacts are unchanged. Aboriginal heritage mitigation measures have been updated (see Section 3.5 and Appendix C of this Submissions Report). The commitments are equally robust to those in the EIS. There is no reduction of

EIS assessment (summary excerpt)	Submissions Report review
	mitigation measures
Ability to be approved The Baldon Wind Farm Project would result in numerous benefits, local and regional. The Project addresses local, state and Commonwealth policies aimed to facilitate the required transition to renewable energy generation. The Project meets relevant planning requirements and is consistent with the principles of Environmentally Sustainable Development (ESD). The environmental values at this site are well understood. However, to address inevitable areas of uncertainty, conservative approaches have been adopted, including risk-based adaptive management mechanisms. The result is a Project that: • Provides important contribution to the State’s transition toward a sustainable energy future • Responds well to its natural and cultural context, avoiding where possible or minimising impacts, particularly biodiversity values. • Includes a specific social impact management framework to mitigate negative social impacts and increase the likelihood of beneficial community outcomes • Includes appropriate contributions to the local economy, through stimulus, Council contributions and benefit sharing initiatives. The Project is considered justifiable and approvable.	The ability of the Project to be approved for reasons outlined in the EIS are maintained and strengthened following the Submissions Report process. Additional environmental assessments completed and provided as part of this Submissions Report reduce the level of uncertainty present at the EIS assessment phase and strengthen the project design and mitigation measures to support improved management of potential social and environmental impacts. Further consultation has occurred and community benefits as proposed in the EIS would be maintained.

7 REFERENCES

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APPENDICES

Appendix A	Schedule of Lands (Updated)
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APPENDIX A – SCHEDULE OF LANDS (UPDATED)

Lots	DP	Landowner
Project Area		
1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15	114086	Landowner 1
12, 14	114102	Landowner 1
1	115951	Landowner 1
2, 3	134029	Landowner 1
121, 122, 123, 124	134030	Landowner 1
130, 131, 132, 133, 134, 135, 136, 137, 138	134031	Landowner 1
125, 126	134032	Landowner 1
1	182223	Landowner 1
1, 3, 4	235869	Landowner 1
1, 2, 3	235870	Landowner 1
1, 2	527290	Landowner 1
1, 2	527291	Landowner 1
1, 2	527292	Landowner 1
1	664937	Landowner 1
1	665905	Landowner 1
1	665906	Landowner 1
1	665907	Landowner 1
2, 5, 10, 11, 12, 13, 14, 15, 16, 17, 18, 50, 51, 52, 53, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87	751175	Landowner 1
1, 2, 3, 4, 5, 6, 9, 10, 12, 13, 14, 18, 19	751190	Landowner 1
4, 5, 6, 7	751225	Landowner 1
13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 48, 49, 50, 51, 52, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109	756506	Landowner 1
44, 45, 46, 47, 72, 73, 74	756549	Landowner 1
19, 20, 21, 22, 23, 24	756555	Landowner 1
19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 38, 39, 40, 41, 42, 43, 48, 49,	756573	Landowner 1
27, 28, 29	756595	Landowner 1

Lots	DP	Landowner
1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 25, 26, 27, 28, 29, 30, 30, 31, 32, 33, 34, 35	756596	Landowner 1
1, 2, 12, 18, 19, 20, 22, 23, 24, 25, 26, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 65, 66, 68, 69, 70, 71, 72, 73, 88, 89, 90	756601	Landowner 1
23,30	756595	Landowner 2
36, 57, 58 ,59	756555	Landowner 2
1	1271318	Landowner 2
Off-Site Road Modifications (NSW)		
Road reserve: NSW Road modification 1: Euston: Murray Valley Hwy onto Sturt Hwy (Route 1 km index 546.0)		Crown / Council
Road reserve: NSW Road modification 2: Balranald: Sturt Hwy (Market Street) onto Sturt Hwy (Route 1 km index 623.7)		Crown / Council
54 Market Street Balranald (Lot 9 DP 658690) Corner of Market Street and Sturt Hwy, Balranald		Private
Road reserve: Site Access: Sturt Hwy into Project Area (Route 1 km index 676.0)		Crown / Council

APPENDIX B – SUBMISSIONS REGISTER

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
Government Agencies				
Biodiversity Conservation & Science	Government		As per submission	Section 4.1
Heritage NSW	Government		As per submission	Section 4.2
TfNSW	Government		As per submission	Section 4.3
Hay Shire Council	Government		As per submission	Section 4.4
Murray River Shire Council	Government		As per submission	Section 4.5
Edward River Shire Council	Government		As per submission	Section 4.6
DCCEE Water	Government		As per submission	Section 4.7
Water NSW	Government		As per submission	Section 4.8
DPI Fisheries	Government		As per submission	Section 4.9
CASA	Government		As per submission	Section 4.10
Airservices Aust.	Government		As per submission	Section 4.11
Department of Defence	Government		As per submission	Section 4.12
Fire & Rescue NSW	Government		As per submission	Section 4.13
NSW Rural Fire Services	Government		As per submission	Section 4.14
DPI Agriculture	Government		As per submission	Section 4.15
DPHI Planning	Government		As per submission	Section 4.16
NSW EPA	Government		As per submission	Section 4.17
DPHI Crown Lands	Government		As per submission	Section 4.18
NPWS	Government		As per submission	Section 4.19
NSW Mining, Exploration & Geoscience	Government		As per submission	Section 4.20
Community Submissions				
SE-74875461	Organisation – BG&Amp, JL Jarrett PL	Object	Embodied energy, incl mined minerals, means wind farms are a high environmental impact	Section 5.3.7
			Biodiversity impacts - fauna impacts	Section 5.3.2

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
			Australia's export of mining resources contributes to CO ² emissions	Section 5.5.5
			Construction traffic impacts	Section 5.3.10
			Decommissioning, responsibility for	Section 5.1.2
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-74875464	Public	Object	Embodied energy, incl mined minerals, means wind farms are a high environmental impact	Section 5.3.7
SE-74875467	Public	Object	Biodiversity impacts - fauna impacts	Section 5.3.2
			Displacement of primary production	Section 5.3.5
SE-74918722	Public	Object	Decommissioning, responsibility for	Section 5.1.2
SE-74918740	Public	Comment	Community submissions are often distorted by personal grievances, unverified and do not view the proposal rationally	Section 5.2.3
SE-74920459	Organisation – Save our Surroundings	Object	Turbine fires, risk of bushfire and emergency response to bushfire, including Aerial firefighting will be restricted in and adjacent to the project area.	Section 5.3.11
			Waste management at decommissioning, incl BESS	Section 5.3.6
			Expensive and obsolete technology	Section 5.4.1
			Decommissioning, responsibility for	Section 5.1.2
SE-74920468	Public	Object	Expensive and obsolete technology	Section 5.4.1
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			The Project won't address climate change.	Section 5.4.4
SE-74958466	Public	Support		
SE-75304745	Organisation – CWO Rez Inc	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Objects to the NSW Government's Energy Strategy and Climate Change Policy	Section 5.5.2
			Embodied energy means wind farms are a high environmental impact	Section 5.3.7
			Establishment of the REZ, and questions about the total intended capacity	Section 5.5.4
			Inadequate consultation and community views were ignored	Section 5.2.2

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
			Biodiversity impacts – vegetation clearing	Section 5.3.1
			Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	Section 5.2.1
			Construction traffic impacts	Section 5.3.10
			Visual impacts including cumulative impacts	Section 5.3.15
			The Project should not be granted water access rights	Section 5.3.20
			Aviation risks and aviation study is inadequate	Section 5.3.14
			Turbine fires, risk of bushfire and emergency response to bushfire, including Aerial firefighting will be restricted in and adjacent to the project area.	Section 5.3.11
			Decommissioning, responsibility for	Section 5.1.2
			Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
SE-75332966	Public	Object	Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
SE-75332969	Public	Object	Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
SE-75333213	Organisation – SOS Moulamein	Object	Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75345233	Public	Object	Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75356731	Public	Object	Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75367723	Public	Object	Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75370734	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Displacement of primary production	Section 5.3.5
			Waste management at decommissioning, incl BESS	Section 5.3.6
			Wind farms are not economically viable without subsidies	Section 5.4.3
			Expensive and obsolete technology	Section 5.4.1

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat	Section 5.5.1
			Expensive and obsolete technology	Section 5.4.1
SE-75370980	Public	Object	Decommissioning, responsibility for	Section 5.1.2
SE-75370982	Public	Object	Displacement of primary production	Section 5.3.5
SE-75371466	Public	Object	Biodiversity impacts – vegetation clearing	Section 5.3.1
SE-75402974	Public	Object	Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
			Landscape character impacts	Section 5.3.16
			Expensive and obsolete technology	Section 5.4.1
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Embodied energy means wind farms are a high environmental impact	Section 5.3.7
			Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75415747	Organisation – Save our surroundings Riverina	Object	Fire risk related to BESS	Section 5.3.12
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
SE-75430211	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Expensive and obsolete technology	Section 5.4.1
			Turbine fires, risk of bushfire and emergency response to bushfire, including Aerial firefighting will be restricted in and adjacent to the project area.	Section 5.3.11
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
			Aviation risks and aviation study is inadequate	Section 5.3.14
			Inadequate consultation and community views were ignored	Section 5.2.2
SE-75431958	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Waste management at decommissioning, incl BESS	Section 5.3.6

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Decommissioning, responsibility for	Section 5.1.2
			Expensive and obsolete technology	Section 5.4.1
			Landscape character impacts	Section 5.3.16
SE-75431961	Organisation – Save our surrounding Murrumbidgee	Object	Embodied energy means wind farms are a high environmental impact	Section 5.3.7
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
SE-75431964	Public	Object	Inadequate consultation and community views were ignored	Section 5.2.2
			Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
SE-75431967	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat	Section 5.5.1
SE-75431971	Public	Object	Decommissioning, responsibility for	Section 5.1.2
			Wind farms are not economically viable without subsidies	Section 5.4.3
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Fire risk related to BESS	Section 5.3.12
			Displacement of primary production	Section 5.3.5
			Additional transmission lines to connect wind farms are unnecessary environmental impact	Section 5.5.3
SE-75432458	Public	Object	Expensive and obsolete technology	Section 5.4.1
			Decommissioning, responsibility for	Section 5.1.2
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.1
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75432462	Public	Object	Landscape character impacts	Section 5.3.16
			Fire risk related to BESS	Section 5.3.12
			Waste management at decommissioning, incl BESS	Section 5.3.6

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
SE-75432465	Public	Object	Biodiversity impacts – vegetation clearing	Section 5.3.1
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75432468	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Displacement of primary production	Section 5.3.5
SE-75452713	Public	Object	Question about grid connection point and transmission capacity	Section 5.1.3
SE-75453458	Public	Object	Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	Section 5.2.1
SE-75459208	Public	Object	Displacement of primary production	Section 5.3.5
SE-75506707	Organisation – Rainforests Reserves Australia	Object	Additional transmission lines to connect wind farms are unnecessary environmental impact	Section 5.5.3
			Biodiversity impacts – vegetation clearing	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
SE-75537471	Public	Object	Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
			Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75538477	Public	Object	Biodiversity impacts – vegetation clearing	Section 5.3.1
			Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75557730	Public	Object	Construction traffic impacts	Section 5.3.10
			Workforce accommodation and community impacts to Moulamine	Section 5.3.17
			Landscape character impacts	Section 5.3.16
SE-75557733	Public	Object	Displacement of primary production	Section 5.3.5
SE-75557737	Public	Object	Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	Section 5.2.1
			Objects to the NSW Government's Energy Strategy and Climate Change Policy	Section 5.5.2
SE-75557742	Public	Object	Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
SE-75557745	Public	Object	Landscape character impacts	Section 5.3.16
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Workforce accommodation and community impacts to Moulamine	Section 5.3.17
			Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	Section 5.2.1
			Decommissioning, responsibility for	Section 5.1.2
SE-75557760	Public	Object	Displacement of primary production	Section 5.3.5
			Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Waste management at decommissioning, incl BESS	Section 5.3.6
			Inadequate consultation and community views were ignored	Section 5.2.2
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Expensive and obsolete technology	Section 5.4.1
SE-75562002	Public	Object	Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75573970	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
SE-75576961	Public	Object	Displacement of primary production	Section 5.3.5
SE-75577458	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75577461	Public	Object	Turbine fires, risk of bushfire and emergency response to bushfire, including Aerial firefighting will be restricted in and adjacent to the project area.	Section 5.3.11
SE-75579208	Public	Object	Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
SE-75579212	Public	Object	Wind farms provide limited employment opportunities	Section 5.3.13
SE-75579215	Public	Object	Construction traffic impacts	Section 5.3.10
			Landscape character impacts	Section 5.3.16
			Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
SE-75589459	Public	Object	Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Biodiversity impacts – vegetation clearing..	Section 5.3.1
SE-75589461	Public	Object	Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
			Expensive and obsolete technology	Section 5.4.1
			Embodied energy means wind farms are a high environmental impact	Section 5.3.7
			Modern Slavery concerns about the proponent	Section 5.2.4
			Decommissioning, responsibility for	Section 5.1.2
			Wind farms provide limited employment opportunities	Section 5.3.13
			Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat	Section 5.5.1
			Biodiversity impacts – vegetation clearing.	Section 5.3.1
SE-75589708	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Embodied energy means wind farms are a high environmental impact	Section 5.3.7
SE-75590959	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Question about grid connection point and transmission capacity	Section 5.1.3
			Construction traffic impacts	Section 5.3.10
			Landscape character impacts	Section 5.3.16
			Decommissioning, responsibility for	Section 5.1.2
			Expensive and obsolete technology	Section 5.4.1
SE-75591472	Public	Object	Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat	Section 5.5.1
			Wind farms provide limited employment opportunities	Section 5.3.13
			Biodiversity impacts – vegetation clearing..	Section 5.3.1
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75606457	Organisation	Object	Displacement of primary production	Section 5.3.5
SE-75606461	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Decommissioning, responsibility for	Section 5.1.2
SE-75608707	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
SE-75623228	Public	Object	Decommissioning, responsibility for	Section 5.1.2
			Landscape character impacts	Section 5.3.16
SE-75625969	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
SE-75635458	Public	Object	Decommissioning, responsibility for	Section 5.1.2
			Landscape character impacts	Section 5.3.16
			Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
SE-75635719	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Additional transmission lines to connect wind farms are unnecessary environmental impact	Section 5.5.3
SE-75639471	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Decommissioning, responsibility for	Section 5.1.2
			Landscape character impacts	Section 5.3.16
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Wind farms are not economically viable without subsidies	Section 5.4.3
			Objects to the NSW Government's Energy Strategy and Climate Change Policy	Section 5.5.2
SE-75644480	Organisation – National Rational Energy Nework	Object	Expensive and obsolete technology	Section 5.4.1
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Embodied energy, incl mined minerals, means wind farms are a high environmental impact	Section 5.3.7
			Embodied energy - BESS	Section 5.3.8
			Additional transmission lines to connect wind farms are unnecessary environmental impact	Section 5.5.3
			Establishment of the REZ, and questions about the total intended capacity	Section 5.5.4
			Decommissioning, responsibility for	Section 5.1.2
			Displacement of primary production	Section 5.3.5
			Wind farms are not economically viable without subsidies	Section 5.4.3
SE-75645713	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Turbine fires, risk of bushfire and emergency response to bushfire, including Aerial firefighting will be restricted in and adjacent to the project area.	Section 5.3.11
SE-75646459	Public	Comment	Noise and vibration - amenity and health impacts, including cumulative impacts	Section 5.3.9
SE-75646462	Public	Object	Waste management at decommissioning, incl BESS	Section 5.3.6
			Expensive and obsolete technology	Section 5.4.1
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
			Objects to the NSW Government's Energy Strategy and Climate Change Policy	Section 5.5.2
			Energy infrastructure bought from China and foreign ownership of energy infrastructure is a national security threat	Section 5.5.1
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.1
			Displacement of primary production	Section 5.3.5
			Objects to the NSW Government's Energy Strategy and Climate Change Policy	Section 5.5.2
			Wind farms are not economically viable without subsidies	Section 5.4.3
SE-75656960	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
SE-75694960	Public	Object	Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	Section 5.2.1
			Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75700708	Public	Object	Associated landholders and neighbour agreements - determination of - and lack of community benefit sharing	Section 5.2.1
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Expensive and obsolete technology	Section 5.4.1
SE-75700710	Public	Object	The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Wind farms are not economically viable without subsidies	Section 5.4.3
			Embodied energy means wind farms are a high environmental impact	Section 5.3.7
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Decommissioning, responsibility for	Section 5.1.2
SE-75700712	Public	Object	Biodiversity impacts – vegetation clearing..	Section 5.3.1
			The Project won't provide reliable power (due to dependency on wind)	Section 5.4.2
			Expensive and obsolete technology	Section 5.4.1
SE-75703209	Public	Object	Biodiversity impacts – vegetation clearing.	Section 5.3.1
			Biodiversity impacts - fauna impacts	Section 5.3.2
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3
SE-75703707	Organisation	Comment	Construction traffic impacts	Section 5.3.10
			Visual impacts including cumulative impacts	Section 5.3.15
SE-75716470	Organisation – Yass Valley Landscapes	Object	Question about grid connection point and transmission capacity	Section 5.1.3
			Decommissioning, responsibility for	Section 5.1.2
			Waste management at decommissioning, incl BESS	Section 5.3.6
SE-75718710	Public	Object	Expensive and obsolete technology	Section 5.4.1
			Displacement of primary production	Section 5.3.5

Submission Id	Submitter type	Classification	Issue	Section where issues addressed in Submissions Report
			Contamination by BPA or other unspecified WTG contaminant sources - soils, surface waters and groundwater	Section 5.3.4
			Contamination from BESS	Section 5.3.19
			Aquatic impacts - sedimentation affecting local waterways and the Murray River	Section 5.3.18
			Bird and bat deaths by blade strike, incl potential cumulative impacts	Section 5.3.3

APPENDIX C – UPDATED MITIGATION MEASURES

ID	Safeguards and mitigation measures	Project stage
Biodiversity		
B1	Detailed design will: • Ensure turbine locations will be micrositied around Little Eagle (<i>Hieraaetus morphnoides</i>) and Wedge Tail Eagle (<i>Aquila audax</i>) nests identified in the BDAR to provide a minimum 300 m buffer from turbines. • Ensure no dams will be removed to minimise impacts to Southern Bell Frog (<i>Litoria raniformis</i>) • Utilise existing survey data for Mosgiel Daisy (<i>Brachyscome papillosa</i>) and Chariot Wheels (<i>Mairena cheelii</i>) to minimise footprint in areas of core habitat, such as micrositing for cabling routes or reducing track width.	Design / pre-construction
B2	An adaptive Biodiversity Management Plan (BMP) will be developed with input from BCD and DCCEEW prior to commencement of the action. Measures will include all mitigation measures established in the BDAR, including but not limited to the following: Fauna management, including: • Staged clearing procedures for hollow bearing trees • Relocation of habitat features • Vehicle hygiene, movement and parking protocols • Southern Bell Frog mitigation • Pre-clearing surveys and protocols for Plains-wanderer nesting sites • Trenching protocols to minimise fauna impacts Vegetation management, including: • Rehabilitation protocols with consideration to native revegetation requirements • Weed, pest animal and pathogen management • Staff training requirements with respect to understanding the sites sensitive environmental features	Pre-construction / construction

ID	Safeguards and mitigation measures	Project stage
B3	Finalise, in consultation with BCS, and implement the Bird and Bat Adaptive Management Plan (BBAMP).	Pre-construction and Construction
B4	The Project's offset obligation will be met in accordance with the NSW Biodiversity Offsets Scheme (BOS), and may include the following options: - Retiring credits under the Biodiversity Offsets Scheme based on the like-for-like rules, or - Making payments into the Biodiversity Conservation Fund using the offset payments calculator, or - Funding a biodiversity action that benefits the threaten entities impacted by the development.	Prior to construction
B5	Undertake a survey to confirm absence and/or avoidance of Bindweed (<i>Convolvulus tedmoorei</i>) in site access upgrade footprint along Sturt Highway.	Prior to construction
B6	Implement the Southern Bell Frog Adaptive Management Plan.	Construction
Aboriginal heritage		
AH1	All sites identified in the Project area must be managed in accordance with the site specific mitigation and management recommendations provided in the site impacts table included in Appendix D of the Archaeological Technical Report (Appendix F of the updated ACHA report.	Construction
AH2	Cultural Heritage Management Plan (CHMP) will be prepared to address the potential for finding additional Aboriginal stone artefacts and objects during the construction of the Project and for the management of known sites within the Development corridor in accordance with the ACHA. The CHMP should include at a minimum the following items: An unexpected finds procedure to manage any objects suspected to be Aboriginal in origin during the construction, maintenance, operation and decommissioning. The unexpected finds procedure must also include a procedure to manage	Prior to construction

ID	Safeguards and mitigation measures	Project stage
	suspected human remains. • Include requirements for heritage matters and an Aboriginal Cultural Awareness element to be included as part of the site inductions for all employees, contractors and utility staff working on site. • Include requirements for management of sites during construction including demarcation and signage, monitoring of initial ground disturbing activity in higher sensitivity areas and any ongoing auditing of site condition if necessary. • Include a methodology for surface collection, storage and relocation of collected material. Preparation of the CHMP should be undertaken in consultation with the registered Aboriginal parties.	
AH3	Specific microsites recommendations and further assessment stipulated in the ACHA must be implemented during detailed design, not limited to: • Buffer zones to protect BWF – 24 and BWF – 195, as well as any others that need to be fenced or avoided once detailed design is confirmed. • The gypsum extraction works area (a lower sensitivity area has been defined). • A program of subsurface test excavation for areas of PAD and Mounds that are unable to be avoided by ground disturbing works (specific locations to be confirmed post final design and prior to construction). • Installation of overhead cabling (specific locations have been identified in the ACHA).	Prior to construction
AH4	All works for the Baldon Wind Farm Project must stay within the area assessed in the ACHA or further assessment and consideration of impacts will be required. This may include additional Aboriginal consultation and survey and/or subsurface testing.	Prior to construction
Landscape and visual		
V1	The turbines will have a matte white finish and consist of three blades which is consistent with the current turbine models being considered.	Construction Operation

ID	Safeguards and mitigation measures	Project stage
V2	Site specific planting for the purposes of visual screening is offered to landholders of receivers R13 and R24 (if the dwelling is planned to be occupied in the future). The following principles will be adhered to when implementing vegetation screening: • Planting is recommended post construction in consultation with the landowner. • Planting should remain in keeping with existing landscape character. • Species selection is to be typical of the area. • Planting layout should avoid screening views of the broader landscape. • Avoid the clearing of existing vegetation. Where appropriate reinstate any lost vegetation.	Operation
V3	The following night lighting design principles will be implemented for ancillary infrastructure (including switching stations, collector substations and facilities buildings): 1. Control the level of lighting: • Only use lighting for areas that require lighting i.e. paths, building entry points • Switch off lighting when not required • Consider the use of sensors to activate lighting and timers to switch off lighting 2. Lighting Design: • Use the lowest intensity required for the job • Use energy efficient bulbs and warm colours • Direct light downwards • Ensure lights are not directed at reflective surfaces • Use non-reflective dark coloured surfaces to reduce reflection of lighting • Keep lights close to the ground and / or directed downwards • Use light shield fittings to avoid light spill	Operation

ID	Safeguards and mitigation measures	Project stage
V4	Access roads will be designed and constructed to have reduced residual visual impacts by applying the following mitigations: • Where possible utilise or upgrade existing roads, trails or tracks to provide access to the proposed turbines to reduce the need for new roads • Allow for the provision for down sizing roads or restoring roads to existing condition following construction where possible • Any new roads must minimise cut and fill and minimise the loss of vegetation.	Construction and Operation
Social impacts		
SE1	The Community and Stakeholder Engagement Strategy will be adaptive and updated as needed to respond to emerging community and stakeholder concerns. It will be updated in accordance with the recommendations of the Social Impact Assessment and the EIS community and stakeholder engagement program. The CSES will: • Facilitate open, transparent, timely and accessible communication of Project information with the aim of minimising uncertainty and to addressing concerns. • Address concerns about potential environmental, amenity and safety impacts (e.g., traffic, noise, visual). • Continue regular engagement with Councils. • Develop accessible, adequate and responsive grievance and remedy mechanisms in the event of complaints. • Provide ongoing opportunities for the local community (particularly the Moulamein community) to be involved in decision-making processes relating to the Project, the Community Consultative Committee, and the Community Benefit Sharing Program. • Ensure representation of Traditional Owners and other key local Aboriginal stakeholders. • Communicate workforce accommodation plans • Engage with accommodation providers to avoid negatively impacting on tourism opportunities and vulnerable populations who are utilising temporary accommodation. • Communicate transport routes and local traffic management plans.	Prior to construction

ID	Safeguards and mitigation measures	Project stage
	- Collaborate with local councils and other key regional economic or social development stakeholders to support regional economic and social development initiatives. - Work with economic development stakeholders to showcase the Project and the industry within the region. Tell the positive story of the Project's success. - Ensure adequate linkage between environmental management plans stemming from the EIS and community concerns relating to these matters. - Engage with medical and emergency services about the scale, timing and workforce arrangements for the Project's construction phase.	
SE2	Establish a Community Consultative Committee (CCC) in accordance with NSW Department of Planning, Housing and Infrastructure guidelines for State significant projects, with the intention to: - Establish good working relationships and encourage the proponent, committee members and other relevant stakeholders to share information - Allow the proponent to seek feedback from community representatives, stakeholder groups and councils or respond to project-related matters - Give community representatives, stakeholder groups and councils a forum to ask for information or give feedback on a project. - Provide ongoing opportunities for the local community (particularly the Moulamein community) to be involved in the CCC. Ensure representation of Traditional Owners and other key local Aboriginal stakeholders.	Pre construction and construction
SE3	Develop an Industry and Aboriginal Participation Plan (IAPP) to achieve positive local employment and business outcomes for the Project. The IAPP will include the following components: - Local Jobs and Training Program - Local Procurement Policy and Local Business Participation Program - Aboriginal Participation Plan	Pre construction and construction

ID	Safeguards and mitigation measures	Project stage
	• Workforce Management and Accommodation Plan • See the SIA for more detail regarding specific measures that should be included within these plans.	
SE4	Development of a Community Benefits Sharing Program (CBSP) which would aim to provide meaningful contributions to social and economic outcomes within the local and regional areas. Baldon Wind Farm Pty Ltd intends to invest \$1,100 per MW / annum to fund Community Benefit programs over the life of the Project (indexed to CPI) commencing from the time the Project becomes operational. The program will include funding through two key streams: Voluntary Planning Agreements: • Funding contributions to projects that meet strategic community need. • Managed as two distinct agreements/funds by a) Murray River Shire Council and b) Hay Shire Council. Communities Fund: • Strategic community partnerships and/or projects • Community sponsorships • Education and employment initiatives (including Scholarship Program) • First Nations Initiatives, e.g., funding for local initiatives for community and/or employment purposes, education opportunities, support for cultural awareness in the local school network, cultural heritage protection support, support for activities relating to protection and understanding of cultural assets and values, especially those potentially relating to raising community understanding of Aboriginal cultural heritage values found at the site The communities Fund would be managed by Baldon Wind Farm in partnership with the community and key stakeholders. The First Nations component would be managed by an independent committee (yet to be determined) in partnership with the local Aboriginal community. The CBSP will also include consideration of a pre-construction sponsorship fund as well as the potential for in-kind contributions.	Operation

ID	Safeguards and mitigation measures	Project stage
	Recommendations for community investment received during the Social Impact Assessment and the EIS community and stakeholder engagement program will be considered. See the full SIA at Appendix E4 for more detail.	
SE5	The developer would cooperate with other developers and wind farm operators in the region as necessary to address any cumulative social impacts (and potential cumulative benefits) that emerge, including participating in public forums organised by community groups, local Councils or government agencies, where relevant.	Construction and Operation
Traffic and transport		
T1	A Construction Traffic Management Plan (CTMP) will be prepared and implemented. The TMP should be prepared in consultation with TfNSW and relevant councils and implemented in accordance with Australian Standard 1742.3 and the Work Health and Safety Regulation 2017. The TMP would provide additional information regarding the traffic volumes, distribution and vehicle types broken down into: - Hours and days of construction. - Schedule for phasing/staging of the Project. - The origin, destination and routes for: - Employee and contractor light vehicles. - Heavy vehicles. - OSOM vehicles The TMP will include but not be limited to the following key safety initiatives: - Designated transport routes, access and delivery schedules, - Emergency access, - Driver Code of Conduct,	Pre construction, construction and operation

ID	Safeguards and mitigation measures	Project stage
	Implementation of the shuttle bus program, OSOM vehicle haulage and operating protocols, Heavy vehicle scheduling to avoid peak school bus times to limit the interaction of larger vehicles and vulnerable road users Key information relating to road safety to be provided to all staff, Consultation with neighbours and local authorities regarding heavy vehicle and OSOM deliveries, Regular dilapidation reports to be provided to ensure the road network is kept in a safe condition, Suitable signage on Sturt Highway and surrounding roads to advise road users of changed conditions, and On-site requirements including: • Parking • Loading, unloading and storage • Speed restrictions • Appropriate dust suppression measures • Maintenance program for access tracks to ensure safe access	
T2	Provide turn treatments at the site access on Sturt Highway to accommodate construction traffic.	Prior to construction
T3	Implement road upgrades (and obtain relevant approvals) where required to facilitate OSOM transport vehicles successfully accessing the site from the Port of Adelaide.	Pre/during construction (prior to OSOM component delivery)
T4	Three identified secondary access points would only be used in the event of emergency, except for the southern secondary access point on Baldon Road which may be used by workers and local material deliveries (no major component deliveries) travelling to/from	Construction

ID	Safeguards and mitigation measures	Project stage
	Moulamein (estimated up to 10 light vehicles per day). All other vehicles associated with the Project construction and/or decommissioning will enter and exit the Project area via the designated primary site access location off the Sturt Highway.	
T5	Shuttle buses would be used to transport workers to and from the Project area from the existing accommodation camp in the nearby town of Balranald (if used).	Construction
T6	Where possible the movement of OSOM vehicles is timed to not coincide with other OSOM vehicles within the surrounding area to limit the impact to the road network.	Construction
Hydrology		
H1	A Spill and Contamination Response Plan would be developed as part of the overall Emergency Response Plan to prevent contaminants affecting adjacent surrounding environments. The plan would include measures to: • Manage the storage of any potential contaminants onsite. • Mitigate the effects of soil contamination by fuels or other chemicals (including emergency response and the EPA notification procedures and remediation. • Respond to the discovery of existing contaminants at the site (e.g., pesticide containers or asbestos), including stop work protocols and remediation and disposal requirements. • Requirement to notify the EPA for incidents that cause material harm to the environment (refer s147-153 of the POEO Act). • Ensure that machinery arrives on site in a clean, washed condition, free of fluid leaks. • Prevent contaminants affecting adjacent pastures, dams, water courses and native vegetation. • Monitor and maintain spill equipment.	All stages

ID	Safeguards and mitigation measures	Project stage
	Induct and train all site staff.	
H2	The surface treatment of roads should be designed giving regard to the velocity of floodwaters to minimise potential for scouring during flood events.	Pre-construction
H3	Detailed design will consider the results of the completed Flood Study, including the incorporation of any design refinements into updated modelling as necessary, to ensure hydrology and flooding outcomes remain suitable. Key considerations include: - Access roads would be constructed to avoid or minimise obstruction to floodwaters or changes to local hydrology. - Waterway vehicle crossings preferably bed level crossings, constructed flush with the bed of the watercourse on first and second order watercourses to minimise hydraulic impacts. - Buildings and structures (including wind turbines) located outside high flood hazard areas (H5 and above) where they may be vulnerable to structural damage and have significant impact on flood behaviour.	Pre-construction
H4	To protect assets, the design of buildings, equipment foundations and footings for electrical componentry and wind turbine footings would be designed to take into account the 1% AEP flood level to minimise impacts from potential flooding including: - The turbines would be designed to withstand the forces of floodwater (including any potential debris loading) up to the 1% AEP flood event plus 500mm freeboard, giving regard to the depth and velocity of floodwaters. - All electrical infrastructure, including inverters and batteries, would be located above the 1% AEP flood level plus 500mm freeboard. - Where electrical cabling is required to be constructed below the 1% AEP flood level it would be capable of continuous submergence in water. - Fencing would be constructed in a manner which does not adversely affect the flow of floodwater. - The finished floor level of all buildings should be a minimum of 500mm above the 1% AEP flood level.	Pre-construction

ID	Safeguards and mitigation measures	Project stage
H5	Flood warning signs and flood level indicators placed on each approach to any watercourse crossings subject to inundation.	Pre-construction
H6	Waterway crossings (vehicular or service) would be designed in accordance with the following guidelines: • <i>Guidelines for Controlled Activities on Waterfront Land</i>; (NSW DPE, 2022) • Guidelines for Watercourse Crossings on Waterfront Land (DPI, 2018). • Guidelines for Laying pipes and Cables in Watercourses on Waterfront Land (NSW DPE, 2022) • <i>Why do fish need to cross the road? Fish Passage Requirements for Waterway Crossings</i> (Fairfull and Witheridge, 2003). • <i>Policy and Guidelines for Fish Friendly Waterway Crossings</i> (NSW DPI, 2003).	Pre-construction Construction
H7	An Emergency Response Plan incorporating a Flood Response Plan would be prepared in consultation with relevant Councils and the NSW SES prior to construction covering all phases of the proposal. The plan would: • Be prepared in general accordance with the NSW SES “Business Floodsafe Toolkit and Plan” • Detail who would be responsible for monitoring the flood threat and how this is to be done. • Detail specific response measures to ensure site safety and environmental protection. • Outline a process for removing any necessary equipment and materials offsite and out of flood risk areas (i.e. rotate array modules to provide maximum clearance of the predicted flood level). • Consider site access in the event that some tracks become flooded. • Consider appropriate vehicles used to transport staff to and from site, with 4WDs being the preferred vehicle. • Establish an evacuation point. • Define communication protocols with emergency services agencies.	Pre-Construction

ID	Safeguards and mitigation measures	Project stage
Noise		
N1	Develop and implement a construction noise management plan	Construction Decommissioning
N2	Establish and implement a complaints management system	Construction Operation Decommissioning
N3	Revised noise modelling following the finalisation of selected equipment.	Operation
N4	Implement an operational noise management plan inclusive of post construction testing at sensitive land uses, or representative locations to confirm the noise levels achieve the requirements predicted.	Operation
N5	If blasting is required, a blasting specialist would be engaged to achieve the project criterion of 115dB	Construction
Water and soils		
SW1	A Soil and Water Management Plan (SWMP) including site specific progressive Erosion and Sediment Control Plan (ESCP) would be prepared, implemented and monitored during construction to minimise impacts to soil and surface water. They would be prepared in accordance with the 'Blue Book' Volume 1 Managing Urban Stormwater: Soils and Construction (Landcom 2004) and include the following specific provisions: • Stage works to minimise the extent of ground disturbance at any one time. Areas of disturbed soil would be rehabilitated promptly and progressively during construction. • Prior to the commencement of ground disturbing works, and progressively during construction, install erosion and	Construction

ID	Safeguards and mitigation measures	Project stage
	sediment control measures in accordance with the progressive ESCP. • Regular inspections and maintenance of erosion and sediment controls, particularly following rainfall, including maintaining an inspection register. • Ensure that machinery leaves the site in a clean condition to avoid tracking sediment onto public roads. • During all excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation. • Stockpile topsoil appropriately to minimise weed infestation, maintain soil organic matter, and maintain soil structure and microbial activity. • Manage stockpiles in accordance with the Blue Book (Landcom 2004). • Manage works in consideration of heavy rainfall events. • Refuelling of plant and machinery to occur in a bunded area and not within 50 m of a waterbody or drainage line. • Plant and machinery to be appropriately maintained. • Procedure to manage spills and requirement to provide spill kits. • No concrete wash-out will occur within 50 m of a waterbody or drainage line. Concrete washout will occur in a sealed and bunded area. • Unexpected Finds Procedure for contaminated soil. • Procedure for management of waste soil (spoil) including classification.	
SW2	Design and rehabilitation of works required within waterways will adhere to the following guidelines: • <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR, 2018); • <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (DPI (Fisheries), 2003)	Construction

ID	Safeguards and mitigation measures	Project stage
	Policy & Guidelines for Fish Habitat Conservation & Management (DPI, 2013)	
SW3	Should access to groundwater and surface water be required, the Applicant will apply for a Water Access License (WAL) and any other relevant approvals.	Construction / operation / decommissioning
SW4	Disturbance to soils will be limited during operation by restricting vehicle movements to formed access tracks and roads.	Operation
SW5	Following construction, all disturbed areas will be rehabilitated as agreed with the landowner. Consideration should be given to: - Grazing restrictions until vegetation is established - Seed bank protection and seed collection protocols for rehabilitation where appropriate. - Forward planning for seasonal windows and contingencies to address risks identified to sourcing required materials. Monitoring of rehabilitated areas until success criteria are achieved.	Construction
Land		
L1	Stock fences, farm dams, and access tracks to be retained as agreed with the land owner to accommodate continued grazing and farm operations within the Project area and (where possible) the Disturbance area.	Operation
L2	- Agriculture land use will be re-established over the operational footprint (unless otherwise agreed with the landowner and/or regulatory authorities). - The operational footprint will be returned to an agricultural productivity potential that is approximately equivalent of pre-Project status.	Decommissioning
L3	A Decommissioning and Rehabilitation Management Plan will be prepared (approximately 18 months ahead of planned closure) that outlines the rehabilitation objectives and strategies to rehabilitate the wind farm site to pre-wind farm land and soil capability (or an appropriate standard in consultation with the landholder) during the decommissioning phase. The plan would include:	Decommissioning

ID	Safeguards and mitigation measures	Project stage
	• Reinstating soil growth medium of disturbed land at a safe and stable depth in order to mitigate long term effects on the land and soil capability of the Project Disturbance area (except in areas otherwise agreed by the landowner). • Soil capping material will be obtained from stripped and stockpiled topsoil from the construction phase of the Project. Soil capping material should be consistent with surrounding environment. • All remaining below ground infrastructure to be capped with minimum 0.5m of soil of suitable texture and preparation to mitigate long term wind erosion in order to restore pre-disturbance LSC classes. • The following re-spreading and seedbank preparation techniques are recommended to prevent excessive soil deterioration and dispersion over disturbed land . • Topsoil should be spread to a depth that reflects adjacent soil horizons, while also considering the surrounding landform. Soil stabiliser agents may need to be applied if adverse weather conditions and seasonal variation is not supportive of regrowth (e.g. drought conditions). • Where necessary soil should be treated with fertiliser and seeded in one consecutive operation, to reduce the potential for topsoil loss to wind and water erosion. Thorough seedbed preparation should be undertaken to ensure optimum establishment and growth of vegetation.	
Historic heritage		
NAH1	Surveys must be completed by an archaeologist to ground validate the standing location of all telegraph poles within the Disturbance Area.	Detailed design
NAH2	No telegraph poles or the Dethridge wheel are to be impacted at any phase of the Project. Where appropriate, their locations should be noted in the field with flagging tape.	All phases
NAH3	Further historical significance assessment and site inspection will be undertaken if the final detailed design indicates proposed works impact any identified historic heritage items with heritage potential.	Detailed design

ID	Safeguards and mitigation measures	Project stage
NAH4	In the event any heritage finds are identified, works must cease and the Unexpected Finds Procedure (refer to procedure in the ACHA) should be implemented	Construction Operation Decommissioning
Hazards - Aviation		
AV1	Notifications and reporting: - As constructed' details of wind turbine and met masts exceeding 100 m AGL must be reported to CASA as soon as practicable after forming the intention to construct or erect the proposed object or structure, in accordance with CASR Part 139.165(1)(2). - As constructed' details of wind turbine and met mast coordinates and elevation will be provided to Airservices Australia, using the following email address: vod@airservicesaustralia.com. - Any obstacles above 100 m AGL (including temporary construction equipment) will be reported to Airservices Australia NOTAM office until they are incorporated in published operational documents. With respect to crane operations during the construction of the Project, a notification to the NOTAM office may include, for example, the following details: - The planned operational timeframe and maximum height of the crane; and - Either the general area within which the crane will operate and/or the planned route with timelines that crane operations will follow. - Details of the wind farm will be provided to local and regional aircraft operators prior to construction in order for them to consider the potential impact of the wind farm on their operations. - To facilitate the flight planning of aerial application operators, details of the Project, including the 'as constructed' location and height information of wind turbines, WMTs and overhead transmission lines should be provided to landowners so that, when asked for hazard information on their property, the landowner may provide the aerial application pilot with all	Pre-construction, Construction

ID	Safeguards and mitigation measures	Project stage
	relevant information.	
AV2	The rotor blades, nacelle and the supporting towers of the wind turbines will be white. Aviation obstacle lighting will be installed on a select number of wind turbines (and operated if required) for aviation safety purposes. The lighting will be fully shielded from the view of any dwelling within 2 km in accordance with CASA regulations (<i>Part 139 (Aerodromes) Manual of Standards 2019</i>), unless otherwise agreed with associated land holders.	Design
AV3	Met masts will be marked according to the requirements set out in MOS 139 Section 8.10 (as modified by the guidance in NASF Guideline D). Specifically: • marker balls or high visibility flags or high visibility sleeves should be placed on the outside guy wires • paint markings to be applied in alternating contrasting bands of colour to at least the top 1/3 of the mast • ensuring the guy wire ground attachment points have contrasting colours to the surrounding ground/vegetation.	Design
AV4	Overhead transmission lines and/or supporting poles that are located where they could affect aerial application operations will be identified in consultation with local aerial application operators and marked in accordance with CASR Part 139 MOS Chapter 8 Division 10 section 8.110 (7) and section 8.110 (8).	Pre-Construction Construction
AV5	Contact with local fire agencies will be ongoing to facilitate that during a fire emergency nearby the Project: • Access is available to the wind farm site by emergency services response for on-ground firefighting operations • Wind turbines are shut down immediately during emergency operations – where possible, blades should be stopped in the ‘Y’ or ‘rabbit ear’ position.	Pre-Construction Construction Operation
AV6	Triggers for review of the Aviation Impact Assessment are provided for consideration: • Prior to construction to ensure the regulatory framework has not changed. • Following any significant changes to the context in which the assessment was prepared, including the regulatory	Pre-Construction Construction Operation

ID	Safeguards and mitigation measures	Project stage
	framework. - Following any near miss, incident or accident associated with operations considered in this risk assessment. - Where layout changes have been made.	
Hazards – telecommunications		
TC1	Maintain open communication lines for all notified stakeholders throughout the development of the Project so that any signal concerns can be addressed and if required the costs of modifications to telecommunication infrastructure would be bourn by the Applicant.	All phases
TC2	The Project commits to the following agreements with the BOM: - Inform the BOM of any changes to the Project Design, including changes to the turbine locations or height - Give the BOM at least two weeks' notice of any planned shutdown of the Project - Collaborate with the BOM in the event of a severe weather conditions in the interests of community safety.	All phases
TC3	A review of fixed point to point links in the vicinity of turbines T115, T117 and T131, currently nearby but outside of current interference zones, should be undertaken during detailed design.	Pre construction
Hazards - EMF		
EMF1	All electrical equipment will be designed in accordance with relevant codes and industry best practice in Australia	Design
EMF2	The final detailed design of the Baldon WF will ensure cumulative EMF is within acceptable ICNIRP and WHO exposure limits where underground and overhead transmission is proposed.	Design
Hazards – blade throw		

ID	Safeguards and mitigation measures	Project stage
BT1	Turbines will meet current best practice Australian and international (IEC 61400-23) safety standards and will be equipped with sensors that can shut down turbines if an imbalance in the rotor blades is detected.	Design
BT2	Construction	
Hazards – battery		
BESS1	Review the required clearances between the BESS units and other structures to minimise fire propagation once UL 9540A unit level test for the GW-ESS-EBL01-0745-2H1 battery system has been completed.	Design Construction Operation
BESS2	Review the investigation reports on the Victorian Big Battery Fire (occurred on 31 July 2021) and implement relevant findings for the Project. The publicly available investigation reports include: - Energy Safe Victoria: Statement of Technical Findings on fire at the Victorian Big Battery. - Fisher Engineering and Energy Safety Response Group: Report of Technical Findings on Victorian Big Battery Fire.	Design Construction Operation
BESS3	Consult with Fire and Rescue NSW (FRNSW) to ensure that relevant aspects of fire protection measures have been included in the design. This may include: - Type of firefighting or control medium. - Demand, storage, and containment measures for the medium. The above aspects will form an input to the Fire Safety Study, which may be required as part of the development consent conditions, for review and approval by FRNSW.	Design Construction Operation
BESS4	Apply the controls listed in the PHA HAZID register.	Design Construction Operation

ID	Safeguards and mitigation measures	Project stage
Hazards – Bushfire		
BF1	The Project would apply relevant NSW RFS Planning for Bush Fire Protection 2019 guidance to the Project design, including: • Asset Protection Zones • Fuel hazard management • Site access specifications • Fire-fighting resources and preparedness	Design
BF2	Develop a Bush Fire Emergency Management and Operations Plan (BFEMOP) to include but not be limited to: • Detailed measures to prevent or mitigate fires igniting • Work that should not be carried out during total fire bans • Availability of fire-suppression equipment, access and water • Storage and maintenance dangerous or hazardous materials in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids • Notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate • Detail of automatic shutdown controls identified and implemented • A copy of the latest Yanga Precinct Fire Management Strategy • Appropriate bush fire emergency management planning. In developing the BFEMOP, NSW RFS and FRNSW would be consulted on the volume of water supplies, fire-fighting equipment maintained on-site, fire truck connectivity requirements, proposed APZ and access arrangements, communications, vegetation fuel levels and hazard reduction measures.	Construction Operation Decommissioning

ID	Safeguards and mitigation measures	Project stage
BF3	An APZ of minimum 10m would be maintained around all buildings, turbines and BESS. Average grass height within the APZ would be maintained at or below 5cm on average throughout the October to April fire season.	Operation
BF4	Following commissioning of the wind farm, the local NSW RFS and Fire and Rescue brigades would be invited to an information and orientation day covering access, infrastructure, firefighting resources on-site, fire control strategies and risks/hazards at the site.	Operation
Air quality		
A1	Air quality management measures will be included in the CEMP for the Project and would include but not be limited to: • Identification of high-risk construction activities with potential to generate dust, and control measures for the activities, specific to sensitive receivers; primarily at the site access / Sturt highway intersection. • A process for monitoring dust on-site and weather conditions, as well as procedures for altering management measures where required. • Protocols to notify relevant stakeholders regarding the nature and timing of works which may adversely impact them. • A protocol for responding to air quality-related complaints. • Watering and maintenance of haul routes in response to visual cues and vehicle speed restrictions entering, traveling within and leaving the site.	Construction
A2	Stockpiles: • Will be covered or otherwise stabilised • Located sufficiently distant from haul routes, particularly the Sturt Highway access, to manage visual impacts from dust.	Construction/ decommissioning
A3	Works will be designed and programmed to minimise the extent and duration of disturbance.	Pre-construction,

ID	Safeguards and mitigation measures	Project stage
		Construction
A4	Disturbed ground and exposed soils will be permanently stabilised and vegetated as soon as practicable following disturbance to minimise the potential for wind erosion.	Construction
A5	All plant and equipment used at the site will be maintained in accordance with the manufacturer's specifications.	All stages
A6	All plant and equipment accessing and utilising the public road network will be registered.	All stages
A7	Fires and material burning will not be undertaken.	All stages
Waste		
R1	A Waste Management Plan (WMP) would be developed to minimise waste, including: • Identification of opportunities to avoid, reuse and recycle materials, in accordance with the waste hierarchy. • Quantification and classification of all waste streams. • Provision for recycling management on-site. • Tracking of all waste leaving the site and disposal of waste at facilities permitted to accept the waste. • Haulage requirements (such as covered loads / hazardous wastes). • An objective to ensure that any use of local waste management facilities does not exhaust available capacity nor disadvantage the local community	Construction/ Operation/ Decommissioning
R2	Lithium-Ion Batteries would be kept, stored, managed and transported according to manufacturer's instructions and the ADG Code. Any spent batteries would be recycled at a EPA permitted and licensed recycler of Li-Ion batteries.	Construction/ Operation/ Decommissioning

ID	Safeguards and mitigation measures	Project stage
R3	Any septic system would be installed, operated and maintained according to the Hay Council and Murray River Council LGA's regulations.	Construction/ Operation/ Decommissioning

APPENDIX D – POST EIS ENGAGEMENT RECORDS

- Appendix D.01 Meeting records (agenda) – DPHI, 12 November 2024
- Appendix D.02 Meeting minutes – Transport for NSW, 27 November 2024
- Appendix D.03 Meeting records (agenda) – BCS, 4 December 2024
- Appendix D.04 Meeting records (agenda) – NSW Rural Fire Service, 6 December 2024
- Appendix D.05 Email to Fire and Rescue NSW confirming phone discussions, 11 December 2024
- Appendix D.06 Meeting records (agenda) – Heritage NSW, 19 December 2024
- Appendix D.07 Meeting records (agenda) – Cmwltth DCCEEW, 16 January 2025
- Appendix D.08 Meeting records (agenda) – DCCEEW Water, 17 January 2025
- Appendix D.09 Letter from Hay Shire Council, 18 February 2025
- Appendix D.10 Meeting records (agenda) – DPHI, 28 February 2025
- Appendix D.11 Email from Hay Shire Council, 7 March 2025 re. potable water supply
- Appendix D.12 Notes from public information drop-in sessions, 14 & 15 November 2024
- Appendix D.13 Email to Ruralco Water broker re. water market context, 18 February 2025
- Appendix D.14 Email to NSW SES (26 March 2025) and reply (7 April 2025) re. invitation for flood risk consultation.

Mark Terei

From: Vineeta Lal
Sent: Tuesday, 12 November 2024 5:35 PM
To: Nicole Brewer; David Way; tatsiana.bandaruk@planning.nsw.gov.au
Cc: Medard Boutry; Kristina Yan; Mark Terei
Subject: RE: SSD-40138508 Baldon WF- EIS submissions - Review response strategy

Dear Nicole, Tatsiana, and David,

Thank you again for your time today and for meeting with us to discuss our submission categorization. Below are the key action items from our call:

- David and Tatsiana will review the out-of-scope submissions and provide their feedback to Mark and Vineeta.
- Team GWA will liaise with BCS regarding their submissions and will then arrange a meeting with DPHI. This session with DPHI will aim to explain our responses to both the BCS and Cultural Heritage submissions.
- For the Road Upgrades on SW-REZ, Nicole will share the contact at Energy Co with the GWA team.

@David Way I will be in touch to organise our follow up meeting, in the meantime if you or Tatsiana have any questions or need any clarifications please feel free to contact me.

Kind Regards,

Vineeta Lal
Project Developer



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-----Original Appointment-----

From: Vineeta Lal

Sent: Wednesday, October 30, 2024 12:32 PM

To: Vineeta Lal; Medard Boutry; Kristina Yan; Mark Terei; David Way; tatsiana.bandaruk@planning.nsw.gov.au

Cc: Nicole Brewer

Subject: SSD-40138508 Baldon WF- EIS submissions - Review response strategy

When: Tuesday, 12 November 2024 11:30 AM-12:30 PM (UTC+10:00) Canberra, Melbourne, Sydney.

Where: Microsoft Teams Meeting; Sydney - Gullen Range Meeting Room (6 people)

Dear David, Tatsiana & team GWA,

As discussed with David, requesting your time to go through the community and agency submission for Baldon and present our response strategy.

- Response strategy - agency submissions
- Categorisation summary for Community submissions
- Murray River council
- BCS - Floodstudy scope breakout flows

Thank you,

Mark Terei

From: Vineeta Lal
Sent: Friday, 29 November 2024 2:01 PM
To: Medard Boutry; Kristina Yan; Mark Terei; Alexandra Power; Glen Hanchard; Oliver Mihaila; warrick@rja.com.au; David Way; Tatsiana Bandaruk
Cc: Damien Pfeiffer
Subject: RE: SD-40138508 | PAE-74714489 Baldon EIS Submissions TfNSW
Attachments: EIS - TfNSW submission clarifications_TfNSW meeting - Actions 271124.docx

Good afternoon all,

Thank you again for your time earlier this week and for the detailed discussion. Appreciate your input and insights.

Please find attached the action items for your review.

Additionally, many thanks Glen for sharing the example and FAQs for the strategic designs for drainage.

If you have any questions or need further information, please don't hesitate to reach out.

Kind Regards,

Vineeta Lal
Project Developer



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-----Original Appointment-----

From:
Sent: Thursday, November 21, 2024 3:43 PM
To: Vineeta Lal; Medard Boutry; Kristina Yan; Mark Terei; Alexandra Power; Glen Hanchard; Oliver Mihaila; warrick@rja.com.au; David Way; Tatsiana Bandaruk
Cc: Damien Pfeiffer
Subject: SD-40138508 | PAE-74714489 Baldon EIS Submissions TfNSW
When: Wednesday, 27 November 2024 3:00 PM-4:00 PM (UTC+10:00) Canberra, Melbourne, Sydney.
Where: Microsoft Teams Meeting

Hi Alexandra, Glen,

As discussed, proposing a meeting to discuss TfNSW's submissions to Baldon's EIS.

We will share a summary of key questions with yourself prior to the meeting for your reference.

Thank you,
Vineeta

Microsoft Teams [Need help?](#)

Page	Item	Topic	Notes 4/11 – RJA and Amber	Notes 27/11 – TfNSW
1		<i>the Applicant is requested to engage with TfNSW on the preparation and provision of the information regarding Attachment 2, due to the on-going nature of road assessments occurring along the multiple route options identified for the project.</i>		Text
1 3	1	worst-case scenario turn-warrant assessment	Amber have assessed the peak, worst-case scenario, including the construction program peak month. Project traffic becomes peak hour/ worst-case scenario. Could just do the additional assessment for another peak hour scenario.	Action : assess accommodation options for peak traffic - demonstrate one option is more conservative/ provide the designs for each option.
2	4	road modification concept designs <i>further engagement with TfNSW due to the developing situation in the South-West Renewable Energy Zone. Refer to Attachment 2.</i>	Request update from TfNSW as they are flagging that they are starting the road upgrades themselves.	Action: GWA to clarify the preconstruction activities (e.g. geotech) is minor works within the existing land use and does not require traffic assessment
2		Rail crossings	Propose that our draft rail crossings applications are sufficient and this can be a post-approval requirement. Where crossings need upgrading, propose that concept designs may be required pre-approval.	No action
4	2e	Northern property access	Propose to TfNSW that the property access of north side of hwy is not used for project and is a rarely used property access and therefore not required to be designed as an intersection with our site access.	Action: TfNSW to check with Technical design unit on resolving conflict to determine if entrance would not need to be closed (permanently or temporarily)
4	3a	bridge/culvert assessment advice (<i>TfNSW encourages the Applicant to consult on bridge assessments.</i>)	Agree that it is up to TfNSW SPU, no expectation to do ourselves. Ask TfNSW how we progress this? Any REZ/industry level approach being considered?	Action: Alexandra to follow up with TfNSW SPU on our request to assess bridges and culverts on our routes once Mark has shared the copy of the email with Alex.
4	3b	height restriction assessment	To be done post-approvals. GWA undertaking enquiries with overhead power line authorities in NSW, SA and Vic.	The routes are set at 5.5m clearance which is standard. approx. 99power lines may need to be moved within SA routes.

Page	Item	Topic	Notes 4/11 – RJA and Amber	Notes 27/11 – TfNSW
			[No OH structures in NSW from Adelaide. So must be about OH power lines. Power Sol (Newcastle based private OH power line assessment co.). NHVR, Councils, utilities. This is more related to the NHVR permit than TfNSW. EnergyCo will raise the assets Underway in SA Power (Steve Puglesi) and Vic, with Junction Rivers. Commence enquiries with Essential Energy in NSW. (At 6.5 m)]	Action: • RJA to assess height limit as is • RJA to assess powerline raise points for 6.5m height limit • TfNSW to provide data on the 99 lifts assessed • TfNSW request environmental assessment of the required powerline lifts/undergrounding in NSW
4	3c	drainage design	To be done post-approvals.	Action: TfNSW to provide example of high level drainage design (2D typical solution only) • main concern is that it complies with Aust Roads and clause 4.42f of the Act so that a 138 cannot be refused Clear zone approach is still being utilised- Action: Alexandra will advise more/share examples. Shared by TfNSW on 27/11
4	3d	swept paths for OSOM rest areas	To confirm with TfNSW as route study already notes that the vehicles fit within the rest areas.	Action: RJA will provide more details on the rest areas. Swept paths by RJA may not satisfy requirements.
4	3e	Road mod remediation treatments	GWA propose Concept Designs to meet requirements on a permanent basis.	WA and Amber to provide Concept designs-Alexandra ok with it.
5	3f	TCS changes	GWA to seek clarification from TfNSW Point to no traffic light changes. Comments likely related to Newcastle route. Seek clarification about this one from TfNSW. Are they referring to traffic control during the HV transport perhaps?	Glenn wants to ensure that our route assessment is covering all the details.
5	3g	light pole relocations	Identified for Route 1. Light poles don't need to be removed for routes 2-4.	Action: Alexandra will discuss internally with design team and advise GWA. (and acknowledges this is needed post consent). RJA will be looking at providing a lighting plan post approval.
9	4b	Lighting changes		
5	3i	road geometry and alignment		

Page	Item	Topic	Notes 4/11 – RJA and Amber	Notes 27/11 – TfNSW
5	3j	Reduce route options	GWA to seek clarification with TfNSW. (If needed RJA could prepare a detailed road infrastructure register for the primary route.)	Wagga wagga underpass will need to be reviewed if we are using that route. Elong Elong route/ powerlines(internal review referring to the database)- a lot of council don't like to touch the assets. Action: Alexandra to share this database with GWA
5	(B)	swept paths for every turn	RJA to update route study with swept path sketches for routes 2-4 (like was done for route 1) Route 1 Port Adelaide to Baldon WF via Robinvale Route 2 Port Adelaide to Baldno WF via Mildura Route 3 Port Adelaide to Baldon High load option 1 Route 4 Port Adelaide to Baldon High Load Option 2	Action: RJA to confirm if additional widening is needed for blade vehicle, need to ensure there is no damage to the pavement to protect the asset.
9	4a	Revised route assessment including the scope of all required road upgrades	Discuss with TfNSW. The scope of all required road upgrades is identified in the route study. Concept designs being prepared for NSW road upgrades.	Action: Tatsiana will contact the Balranald Hospital as this is a pinch point(location available in the RJA TIA) for other proponents in the SWREZ region.
9	4c	Axle weights and pavement concerns	GWA to seek clarification with TfNSW. Propose to TfNSW that Amber update the TIA with a qualitative assessment versus existing traffic loading on the State roads.	Alexandra happy with the qualitative assessment
		Port of Newcastle transport Route	Based on consultant advice and cost efficiency we will not be utilising the port of Newcastle to site route for OSOM components. We intend to respond to your submission with this statement. If required, at a later point in time we will consider submitting a modification to re-open this option.	

Mark Terei

Subject: Baldon Wind Farm (SSD-40138508) – EIS - BCS Submission DOC24/661152
Location: Microsoft Teams Meeting

Start: Wed 4/12/2024 1:00 PM
End: Wed 4/12/2024 2:30 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Mark Terei
Required Attendees: Julie Gooding; Simon Maffei; Andrew Fisher; Owen De Jong; South West Planning Mailbox
Optional Attendees: Vineeta Lal; Medard Boutry; Kristina Yan; David Canterbury; Les Seddon

Good afternoon Simon and Andrew,

Thank you for BCS' submission regarding the Baldon Wind Farm – attached for easy reference. We would appreciate a meeting to discuss the comments and our draft responses, for biodiversity and briefly for flooding.

Will aim to complete the meeting in 60 mins but booking 90 mins in case, hope that's acceptable to you.

I will send through an agenda with the key discussion points next week in advance of the meeting.

Kind regards,

Mark Terei
Senior Environmental Planner



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Meeting ID: 479 771 548 905

Number	BCS Comment	BCS Recommendations	Action needed
	2 A draft Bird and Bat Adaptive Management Plan needs to be prepared. A Bird and Bat Adaptive Management Plan (BBAMP) based on sufficient survey data and documenting commitments to monitor, mitigate and offset residual impacts to avifauna needs to be provided.		
2.1		Provide a BBAMP as an Appendix to the BDAR as is required by section 2.7 of the BAM Operational Manual Stage 2.	Nature Advisory to supply BBAMP
	3 Additional Bird and Bat Utilisation Survey (BBUS) effort is required so that the BBUS can be used to reliably inform the draft BBAMP.		
3.1		Establish a BBUS survey program with sufficient coverage of the site.	Nature Advisory to Review BBUS surveys. BSC recommendations in reply require more BBUS sites for better coverage.
3.2		Complete a further 12 months of bird and bat utilisation surveys including at height data as part of the BBUS program.	Nature Advisory to conduct further surveys
3.3		Include all seasons of bat utilisation survey results in a revised BDAR.	To update following nature advisory survey completion
	4 The BDAR needs to include more detail to demonstrate that biodiversity impacts have been avoided or minimised. The BDAR requires additional information to demonstrate that impacts have been avoided and minimised, including to SAIL entities.		
4.1		Update section 7 of the BDAR to specifically detail of how impacts to biodiversity have been avoided, including a table showing the impacts on biodiversity and how impacts have been avoided/reduced throughout the assessment process.	Add information on biodiversity impact avoidance
4.2		Update Figure 7-1 to map biodiversity values.	Update map once information is available.
4.3		Update section 7.1.2 to discuss how the chosen wind turbine generators will avoid or minimise impacts on biodiversity values, and why these turbines were chosen over others.	Discuss why these were chosen, update report.
4.4		Explore options to avoid and minimise impacts to biodiversity and document them in the BDAR.	Similar to 4.1. May need to discuss with client.
4.5		Provide meaningful buffers between turbines and stick nests to avoid and minimise impacts to resident raptors, with the buffers chosen based on evidence from literature.	Research buffer sizes for turbines in relation to stick nests. Inform client, update report and mapping.
4.6		Where applicable, detail the measures or options considered but not implemented because they are not feasible and/or practical.	Similar to 4.1 and 4.4. Report/mapping will need updating.
	5 Impacts to Plains-wanderer habitat and recorded locations need to be avoided.		
5.1		Review the project design to avoid known Plains-wanderer habitat. This should include through using existing access tracks wherever possible (see also issue 19)	Project design will need to be looked at to see if habitat can be avoided. BCS recommends that existing tracks are used where available to avoid habitat.
	6 Potential SAIL are unknown as flora species are assumed to be present.		
6.1		Review the SAIL assessment after completing targeted seasonal surveys for the assumed SAIL flora species.	Targeted surveys will need to be completed (<i>Convolvulus tedmorei</i> surveys completed Sep 24). Microhabitats for <i>Pilularia novae-hollandiae</i> need to be identified.
	7 Variability across PCT 164 does not account for wetland areas and gilgai habitats. PCT, Threatened Ecological Communities (TEC), and vegetation zone identification and mapping need to be revised and the biodiversity credit calculation updated.		
7.1		Revise the PCT mapping to more accurately reflect vegetation and edaphic patterns evident on aerial imagery including wetlands and gilgai.	PCT mapping will need to be revised, BAM-C updated, new maps, area calculations. Possible targeted field surveys.
7.2		Sample additional VI plots to capture wetland and gilgai habitats and to demonstrate that the PCT allocation and vegetation condition across the subject land has been adequately sampled and mapped.	BAM Plots will need to be completed, will require survey planning before heading out.
	8 Vegetation integrity (VI) scores need to be revised for each project Stage.		
8.1		Update each BAM-C child case for each stage to only include VI plots collected for that stage.	Update BAM, revise mapping.
8.2		Where VI plots from another stage are required to make up for a shortfall in the required VI plots, provide justification in the BDAR for each plot on why it is suitable to use in the vegetation zone.	Update report, mapping.
8.3		Collect additional VI plots where plots are not within the vegetation zone for each stage of the development footprint.	Possible duplication of current plots or more BAM plots required.
	9 Threatened flora recorded for Project EnergyConnect and on adjacent proposed wind farms should be included in the revised BDAR. New BioNet records for threatened flora, including SAIL species, should be included in the assessment to guide avoidance and mitigation measures.		
9.1		Review BioNet records for threatened flora identified as present on the subject land and consider these as part of revising the species polygons, and the avoid and minimise and mitigation measures in the RTS.	Conduct background searches, update mapping and report
9.2		Submit specimens of <i>Eleocharis obicis</i> recorded in VI plots to a recognised herbarium. If confirmed to be present, revise the BDAR to assess impacts to <i>Eleocharis obicis</i> , include measures to avoid and minimise impacts, identify locations and specific mitigation measures, and prepare a species polygon to offset any residual impacts.	Unsure if we have samples.
9.3		Add <i>Eleocharis obicis</i> as a candidate species to the BAM-C and complete surveys in suitable potential wetland and gilgai habitats.	Update BAM-C, conduct targeted surveys (October/November).
	10 Microhabitats and survey effort for <i>Pilularia novae-hollandiae</i> need to be appropriately estimated.		
10.1		Use existing and revised PCT mapping (issue 7) and existing records (issue 9) to inform surveys in suitable microhabitats for <i>Pilularia novae-hollandiae</i> .	Will need to plan surveys after revised PCT mapping.
	11 Ensure survey effort meets threatened species survey requirements.		
11.1		Ensure survey effort for the Koala meets requirements of relevant guidelines and the TBDC.	Koala SATs or other surveys may need to be completed.
	12 Species polygons need to be consistent with section 5.2.5 and Box 2 of the BAM.		
12.1		Provide justifications for species polygons buffers. In areas where there are small gaps between species polygons in the same associated PCT, review the extent of suitable habitat in the species polygon.	Revise buffers, fix mapping.
12.2		Revise the <i>Pilularia novae-hollandiae</i> species polygon to incorporate PCTs and habitats associated with PEC East records for the species in the subject land.	Revise buffers, fix mapping. May need to wait until targeted surveys are conducted.

12.3		Complete additional targeted surveys before the RTS report is submitted for assumed presence flora species, and update species polygons subject to outcomes of survey results.	Surveys, update mapping and report.
13	The direct impact assessment needs to include impacts associated with the haul route. Some direct, indirect and prescribed impacts need to be appropriately assessed.		
13.1		Update the BDAR to include all impacts to native vegetation and threatened species associated with the haul route(s).	Update BDAR with information on vegetation impacts along haul routes.
14	The indirect impact assessment should include turbine noise and loss of fauna habitat.		
14.1		Update Table 8-6 of the BDAR to consider noise impacts caused by wind turbine operation.	Research and update report
14.2		Update Table 8-6 of the BDAR to provide additional information to support the predicted severity of indirect impacts in accordance with section 8.2 (1) (c) of the BAM.	Research and update table and report.
14.3		Review and update Table 8-6 to ensure all impacts and consequences are documented.	Research and update table.
15	The prescribed impact assessment and proposed mitigation measures need to adequately address impacts of vehicle strike on Southern Bell Frog.		
15.1		Prepare an adaptive management plan to address impacts that are infrequent or difficult to measure such as vehicle strike impacts to the Southern Bell Frog.	Research and update BDAR.
15.2		Remaining residual impacts should be offset via additional biodiversity credits if residual prescribed impacts cannot be adequately avoided or mitigated.	Discuss impacts and offsetting requirements.
16	Prescribed impacts need to be assessed for each impacted entity.		
16.1		Assess the risk of sedimentation (from construction and operation) on threatened species habitat for individual species during and after high rainfall events when water is moving through the landscape.	Address which species could be impacted. Update BDAR.
16.2		Assess the impact of the new network of access tracks on habitat connectivity for threatened entities.	Update BDAR with information on potential impacts.
16.3		Assess the impact of altered hydrology due to clearing for turbines and location of new or upgraded tracks on microhabitat for threatened flora associated with localised wetlands or gilgai.	Research and update BDAR. May need to be completed after targeted surveys to rule out species.
16.4		Update section 2.5 and 8.2.3 to include a discussion of connectivity features for avifauna and aquatic fauna. Section 8.3.2 should specifically discuss the impact of the project on avifauna connectivity such as flyways.	Research and update BDAR.
16.5		Assess vehicle strike impacts for all roads and tracks constructed or used for the project, including those used for the haulage route.	Research and update BDAR.
16.6		Detail the nature and extent of night vehicle movement.	Research and update BDAR.
16.7		Revise the assessment to include all additional species at risk of vehicle strike.	Research and update BDAR to include additional threatened species
17	The assessment of flight paths and collision risk needs to be revised.		
17.1		Update Figure 6-3 to include migratory flight paths and other predicted landscape scale flight paths.	Research and update mapping/BDAR text to address migratory flight paths.
17.2		Revise the collision risk ratings in Table 8-7.	Update table 8-7. <i>Nature advisory to revise</i>
18	Mitigation measures should be detailed in the BDAR to demonstrate effective management of impacts and to give confidence that the offset liability is adequate. Mitigation measures need to include more detail to demonstrate that impacts will be successfully managed.		
18.1		Update Section 9 of the BDAR (including Table 9-1) to detail auditable mitigation and management measures that follow the SMART principles.	Update Table 9-1.
19	Impacts to Plains-wanderer to address the specific project risks is unclear. Matters of National Environmental Significance		
19.1		Conduct a review of project design to avoid known Plains-wanderer habitat. This should include use of existing access tracks wherever possible.	Discuss with client the use of existing tracks and other project design options avoid plains-wander habitat.
19.2		Apply MNES Significant impact guidelines to the Plains-wanderer to determine the potential significance of impacts.	Apply guidelines and update BDAR/mapping as needed.
19.3		Review the specific project risks from the EPBC project assessment notes and consider any additional measures and/or offsets that may be suitable impacts to Plains wanderer breeding habitat outside the important mapped areas.	Research and review risks. Update BDAR.
20	The area of EPBC-listed Natural Grasslands of the Murray Valley Plains Threatened Ecological Community needs to be assessed at the patch scale.		
20.1		Revise the step 1 and 2 of the assessment criteria for the Natural Grasslands of the Murray Valley Plains TEC at the patch scale rather than at the plot level.	Update TEC assessment.
20.2		If required, recalculate impacts to the Murray Valley Plains TEC and reassess impacts.	Update TEC impacts if needed.
21	A complete MNES assessment should be provided to address the Assessment Bilateral.		
21.1		Apply significant impact guidelines to MNES known or likely to occur to determine the potential significance of impacts.	Update MNES assessment as directed.
21.2		Revise the BDAR to specifically address prescribed impacts to MNES	Update BDAR as directed
21.3		Amend section 5, 8.6 and Appendix B of the BDAR and specifically address each of the bilateral assessment requirements as detailed in Attachment C to this response.	Update listed sections as directed.
22	Any threatened flora records should be verified by a herbarium.		
22.1		Provide verification of all threatened flora from a herbarium.	Provide all records of species verified. Maireana cheellii not sent to herbarium nor Swainsona murrayana (recently found)
Other	BAM-C updates October 2024	Grey Snake now added into BAM-C	Surveys already completed in BDAR
		Southern Myotis now added into BAM-C	<i>Confirm if permanent water wider than 3m present/ and check bird and bat surveys</i>
	Pink Cockatoo identified by nature advisory		Investigate pink cockatoo breeding habitat and amend BDAR if required.

Mark Terei

From: Vineeta Lal
Sent: Friday, 6 December 2024 4:12 PM
To: Steve.mckinnon@rfs.nsw.gov.au
Cc: Medard Boutry; Kristina Yan; Mark Terei; Jacqui Mott; Rhys Neild
Subject: RE: DA20220617008597-EIS & DA Exhibition-1- Baldon Wind Farm
Attachments: Baldon WF & DC Coupld BESS.pdf

Dear Steve,

Thank you again for your time today and for meeting with us.
Please find attached the presentation we used during our discussion. If you have any further questions about the project or our technology, please don't hesitate to reach out.

We look forward to continuing our collaboration.

Kind Regards,

Vineeta Lal
Project Developer



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-----Original Appointment-----

From: Vineeta Lal
Sent: Tuesday, December 3, 2024 4:29 PM
To: Vineeta Lal; steve.mckinnon@rfsnsw.gov.au; Medard Boutry; Kristina Yan; Mark Terei; Steve.mckinnon@rfs.nsw.gov.au; Jacqui Mott; Rhys Neild
Subject: DA20220617008597-EIS & DA Exhibition-1- Baldon Wind Farm
When: Friday, 6 December 2024 2:00 PM-2:45 PM (UTC+10:00) Canberra, Melbourne, Sydney.
Where: Microsoft Teams Meeting

Dear Steve,

Thank you for taking the time to meet with us.
As discussed this morning proposing a session to provide yourself with more details about our project Baldon wind farm.
Looking forward to our discussion.

Vineeta Lal
Project Developer



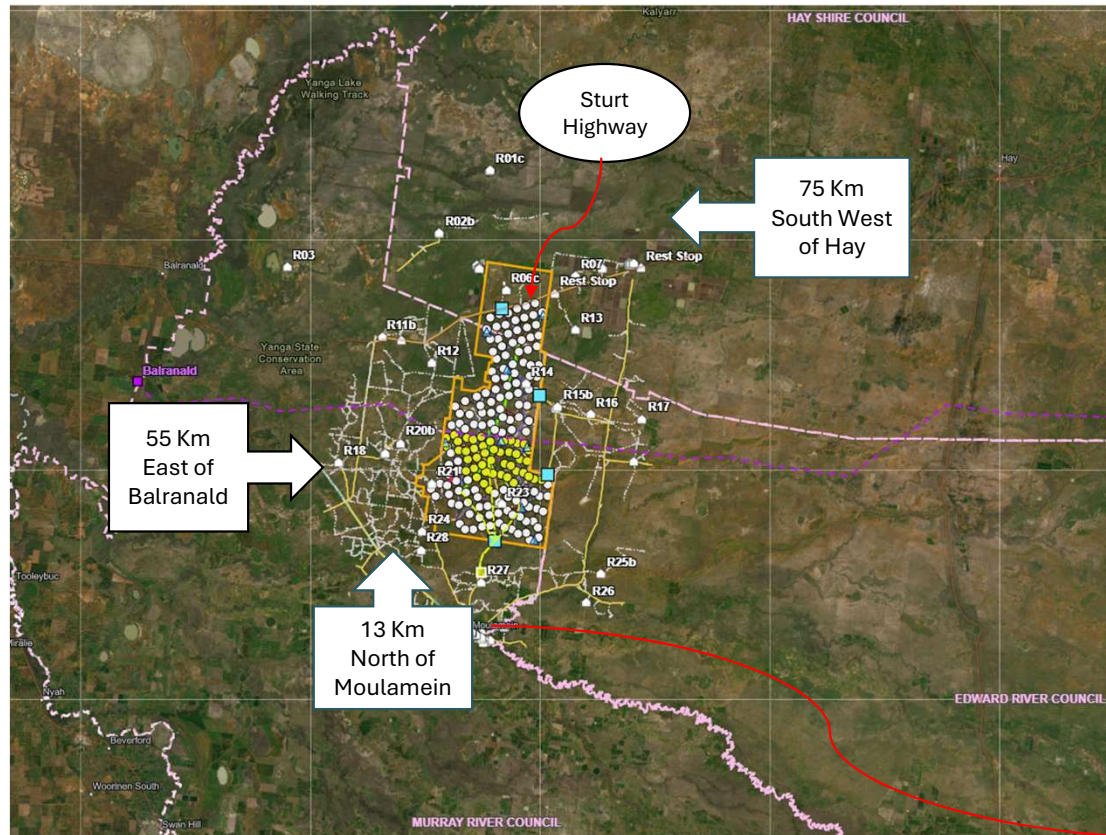
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Baldon Wind Farm & DC Coupled BESS

Goldwind Australia

5 Dec 2024

Project Details - LGAs



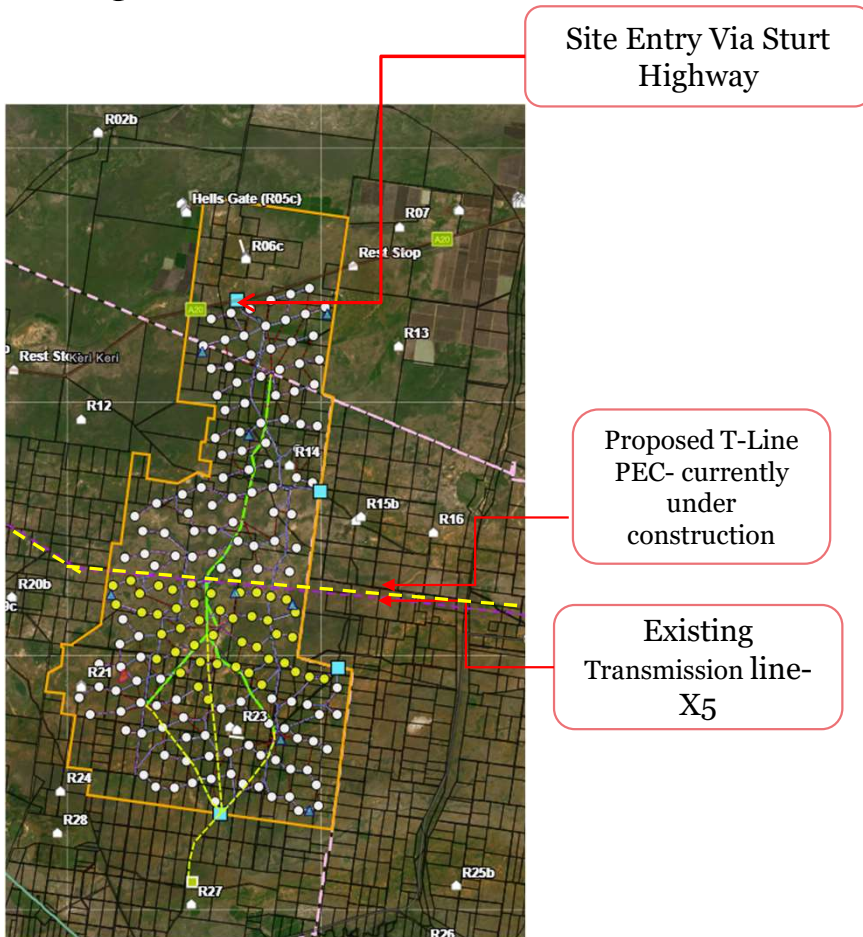
- Baldon Wind Farm is located 13km north of Moulamein, 55km east of Balranald, and 75km southwest of Hay
- The Project is situated within the Riverina-Murray region, with the majority located in the Murray River Local Government Area (LGA) and the northern part within the Hay Shire LGA



We are here

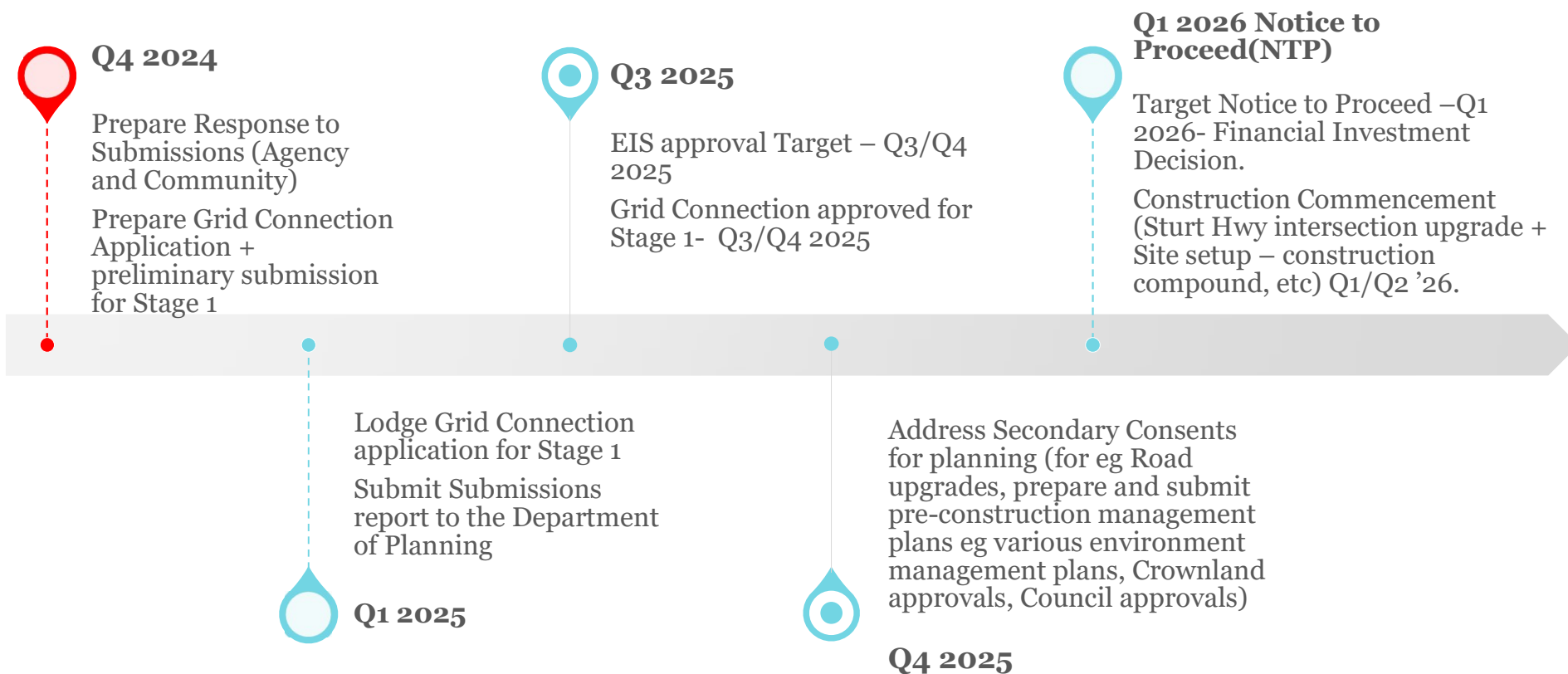
Moulamein

Project Details



- 1440MW Wind Farm proposed with Goldwind's DC-Coupled BESS technology
- 5x project Substation and 1 x Switching station
- 2 Host Landowners
- One road access point from Sturt Highway with options for other light vehicles to access or exit from site for emergency evacuation (Keri East Rd, Baldon Rd, Dry Lake Rd)
- Wind farm would provide improved access on site with gravel-capped access tracks. Also provides established containment lines/fire break in event of fire incident.
- Access rights tender for accessing PEC or VNI W – ongoing - decision will be announced end of 2024.

Baldon Stage 1 Project Timeline

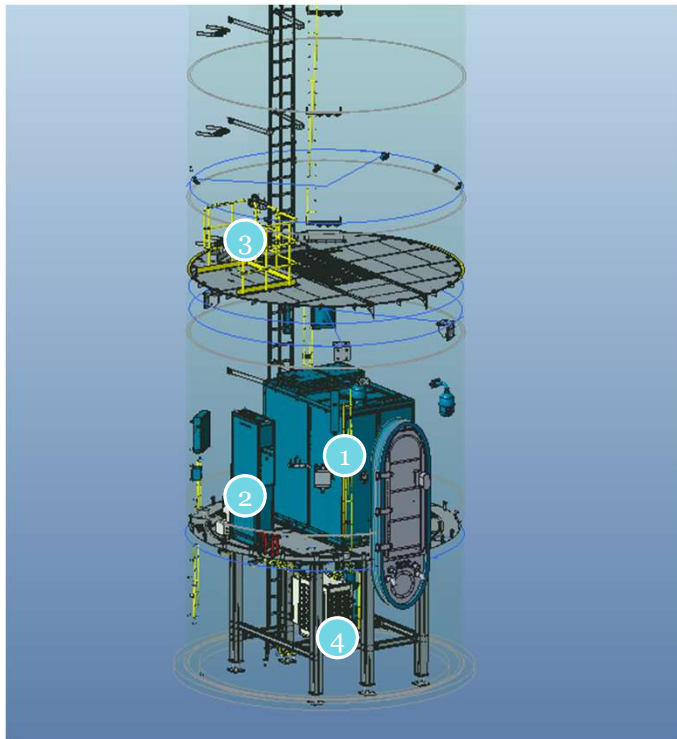


Baldon Stage 1 Project – WTG Technology



- 1 - Blade
- 2 - Pitch System
- 3 - Drivetrain
- 4 - Gearbox
- 5 - Generator
- 6 - Nacelle
- 7 - Base Frame
- 8 - Yaw system
- 9 - Control and Power Supply System
- 10 - Cooling System
- 11 - Wind Measurement System

Baldon Stage 1 Project – WTG Technology



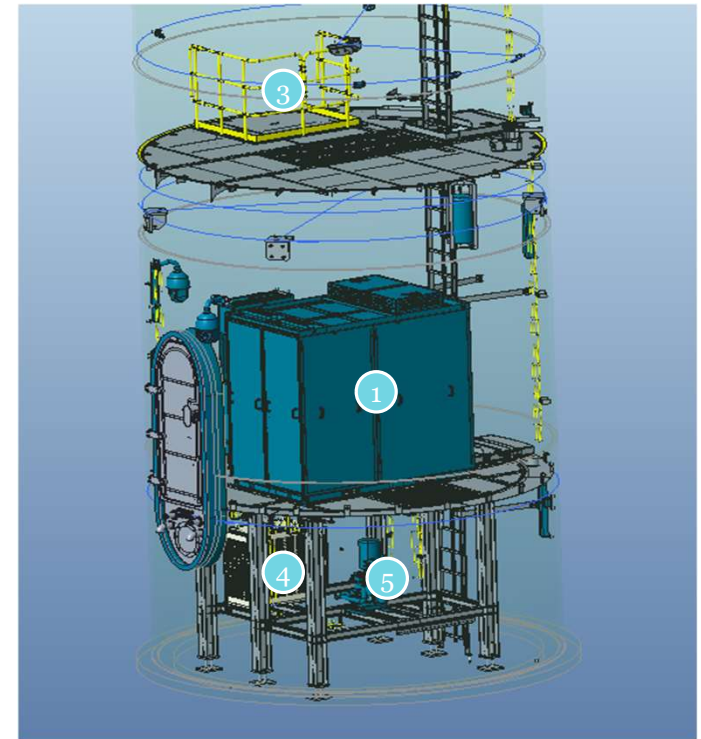
1-Converter

2-Main control cabinet

3-Elevator

4-Auxiliary transformer

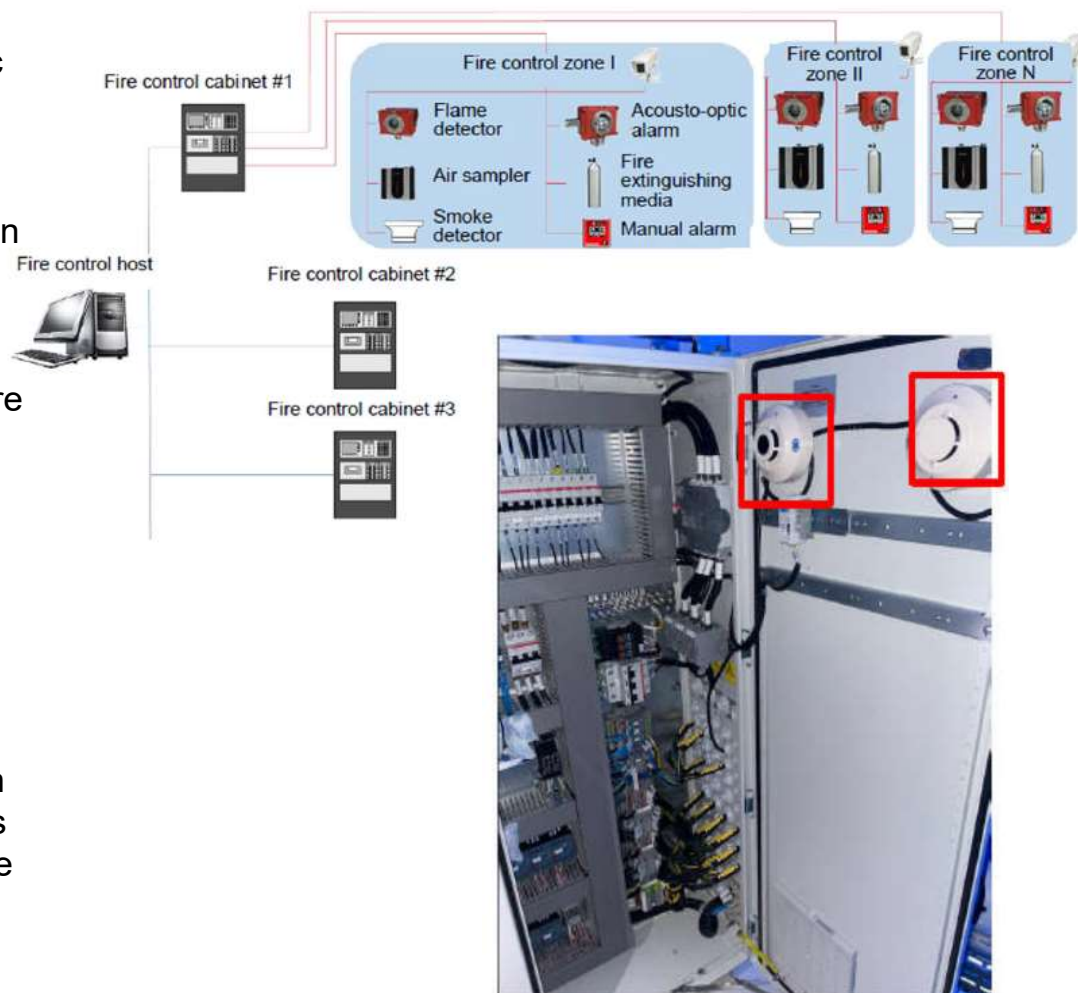
5-Water cooling



Goldwind Fire Detection System



- The WTG fire detection system consists of automatic fire alarm system and manual fire protection system.
- The manual fire protection system is a hand-held fire extinguisher.
- The fire alarm system includes the devices installed in nacelle and cabinet, and the monitoring software installed in the central control room.
- The temperature detector uses the PT100 as a temperature sensor to detect the ambient temperature and transmit the result to the fire alarm controller. If the controller discovers that the current temperature has exceeded the threshold, the detector's warning light is illuminated, and the fire alarm signal is reported. The detector threshold is 88 °C
- The smoke detector detects the concentration of smoke in the environment through the principle of infrared radiation and diffuse reflection and transmits the detected value to the fire alarm controller through the specific fire control bus. If the controller discovers that the current smoke concentration has reached the fire standard, then the detector's warning light is illuminated, and the fire alarm signal is reported



Baldon Stage 1 Project – BESS Technology



Gold Wind DC Coupled BESS

Goldwind Grid forming WTG :

Maintains the AC synchronism characteristics in the high renewable energy penetration power system



New features of Goldwind Grid forming(GFM) WTG

Item	GFM WTG	GFL WTG
System strength support	Strong	Weak
Connect to low SCR Grid	Yes ,up to 1.1	No
Frequency response	Fast , in milliseconds	Slow ,in seconds or minutes
Inertia respond	Yes	No
Overload capacity	Yes	No
Black start	Yes	No
Energy arbitrage	Yes	No
Peak shaving	Yes	No
FACS	Yes	No

Baldon Stage 1 Project – BESS Technology



System configuration example for GW-V15 GFM2.0 WTG

WTG converter with upgrade BESS

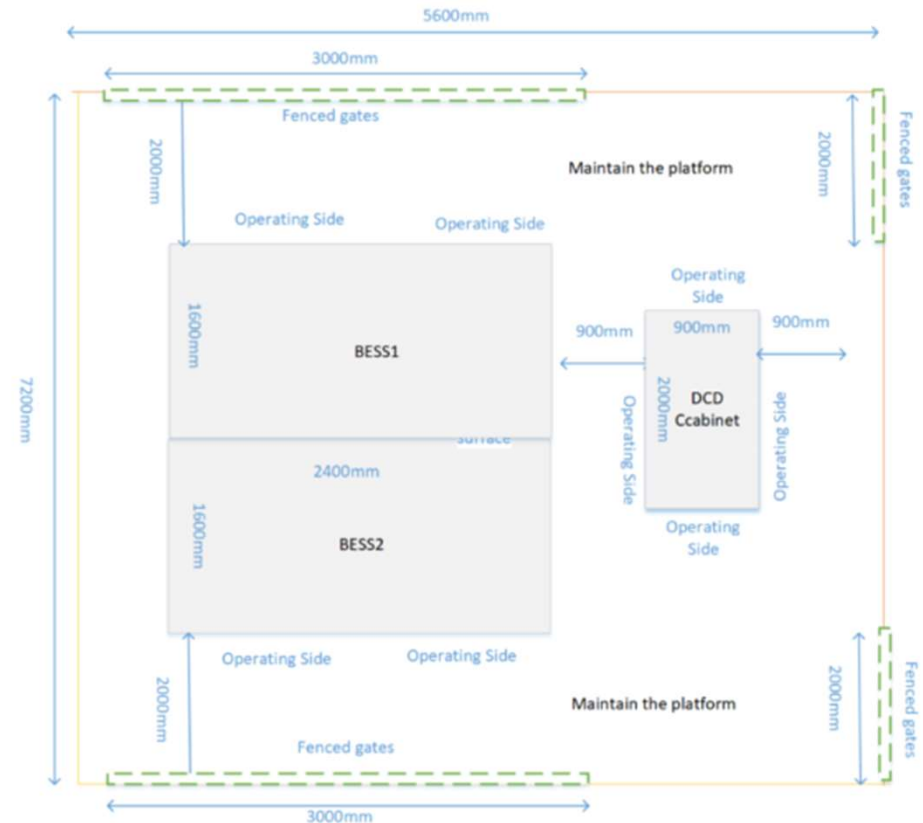
connect terminals and overload capacity

800kW DC-DC converter

745kWh x 2 DC BESS

WTG GFM Control systems

Standard 745kW 2
hours BESS,
optional to extend the
power and energy by
parallel units



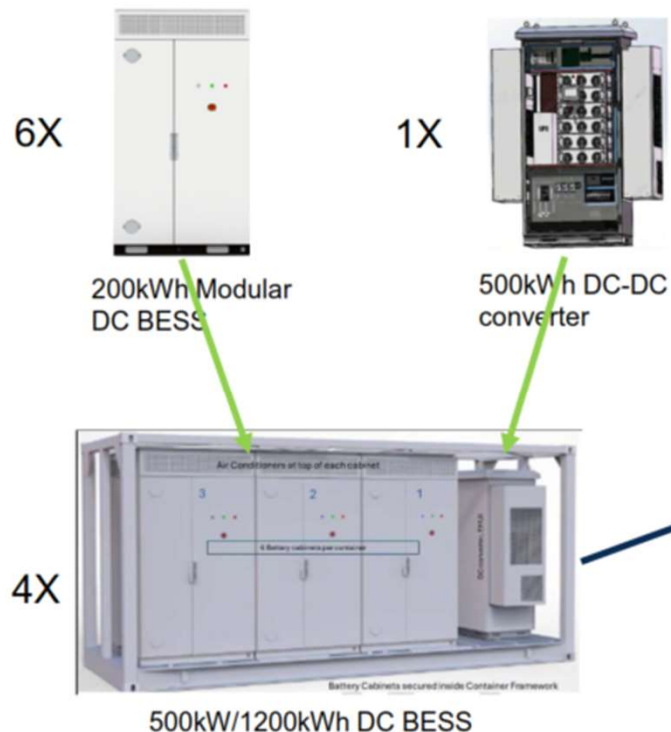
BESS system footprint example for standard configuration

Baldon Stage 1 Project – BESS Technology



Wind Farm, Moorabool, Australia;

- The first Goldwind polt DC coupling BESS GFM WTG oversea (in progress, estimated COD time Q4 2024)
- ✓ Upgrade the existing 3S WTG in WF
- ✓ Provide grid forming functions
- ✓ Provide energy arbitrage and peak shaving functions
- ✓ Embed the BESS to existing WF SCADA system).



Baldon Stage 1 Project – BESS Technology



Design Solution Fire Protection System

V1 (2024-10-09)

4.2.1.1 Modular BESS Cabinet

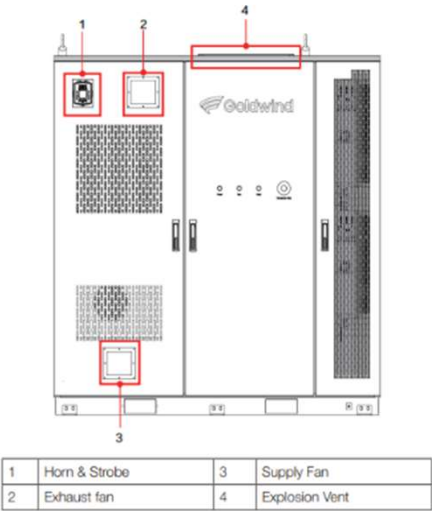
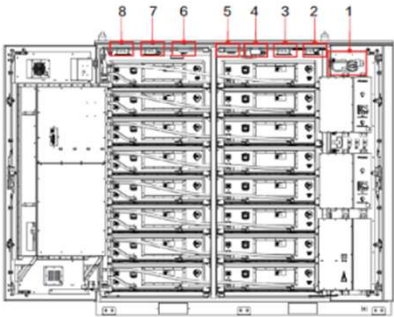
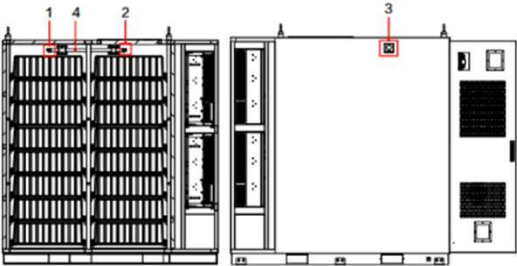


Figure 4-1 Device Location (Door Closed)



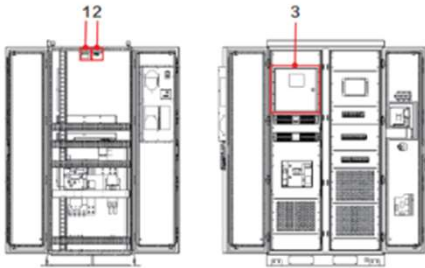
1	Aerosol Generator	5	Smoke Detector
2	Isolator Module	6	Heat Detector
3	Dual Input/Output Module	7 & 8	NAC (Notification Appliance Circuit) Module
4	(H2) Gas Detector		

Figure 4-2 Device Location (Door Open)



1	Sprinkler	3	Fire Water Connection
2	Sprinkler	4	Fire Water Piping

Figure 4-3 Device Location (Water System for Fire Protection System)



1	(H2) Gas Detector	3	Fire Control Panel
2	Smoke Detector		

Figure 4-4 Device Location (Combiner Cabinet)

	Lithium Iron Phosphate (LFP)	Lithium nickel cobalt manganese oxide (NCM)	LITHIUM TITANATE (LTO)
Cell Voltage(V)	3.2	3.6-3.9	2.3
Energy Density (Wh/kg)	90-120	160-200	70-95
Cycle life (times)	>6000	>3000	>8000
Operation temp	-20-75	-30-75	-40-70
Cost	Low	High	Very High
Safety	High	Low	High
Advantage	Long life , high safety, pollution-free	High power density	High cycle life ,fast charging
Disadvantage	Low power density	High price ,low safety	Cost very high ,very low power density
Application	ESS、EV	EV	ESS、EV

Submissions by RFS

- A Bush Fire Emergency Management and Operations Plan (BFEMOP) must be prepared and shall be provided to the local Emergency Management Committee for their information prior to the occupation of the facility.
 - The BFEMOP would be developed prior to commissioning in consultation with the local NSW RFS District Fire Control Centre to manage fire risks, resources and preparedness.
 - Emergency Response Plan (ERP), including an Evacuation Plan, BFEMOP (with a specific battery fire response section). All requirements planned to be captured in one document - the ERP
- Asset Protection Zones must be provided around wind turbine and BESS structures and access roads must comply with the RFS guideline-
 - This will be confirmed during the detailed design stage



Table 7-18 Bush fire mitigation measures

ID	Safeguards and mitigation measures	Project phase
BF1	The Project would apply relevant NSW RFS <i>Planning for Bush Fire Protection 2019</i> guidance to the Project design, including: • Asset Protection Zones • Fuel hazard management • Site access specifications • Fire-fighting resources and preparedness	Design
BF2	Develop a Bush Fire Emergency Management and Operations Plan (BFEMOP) to include but not be limited to: • Detailed measures to prevent or mitigate fires igniting • Work that should not be carried out during total fire bans • Availability of fire-suppression equipment, access and water • Storage and maintenance dangerous or hazardous materials in accordance with AS1940-2004: <i>The storage and handling of flammable and combustible liquids</i> • Notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate • Detail of automatic shutdown controls identified and implemented • A copy of the latest Yanga Precinct Fire Management Strategy • Appropriate bush fire emergency management planning. In developing the BFEMOP, NSW RFS and FRNSW would be consulted on the volume of water supplies, fire-fighting equipment maintained on-site, fire truck connectivity requirements, proposed APZ and access arrangements, communications, vegetation fuel levels and hazard reduction measures.	Construction Operation Decommissioning
BF3	An APZ of minimum 10m would be maintained around all buildings, turbines and BESS. Average grass height within the APZ would be maintained at or below 5cm on average throughout the October to April fire season.	Operation
BF4	Following commissioning of the wind farm, the local NSW RFS and Fire and Rescue brigades would be invited to an information and orientation day covering access, infrastructure, firefighting resources on-site, fire control strategies and risks/hazards at the site.	Operation

Mark Terei

From: Vineeta Lal
Sent: Wednesday, 11 December 2024 3:11 PM
To: firesafety@fire.nsw.gov.au; richard.Jay@fire.nsw.gov.au
Cc: linden.moyes@fire.nsw.gov.au; Medard Boutry; Kristina Yan; Mark Terei; Jacqui Mott
Subject: FRN22/1991 BFS24/5032 8000037262- Baldon Wind Farm

Dear Richard & (Linden)

Thank you for taking the time to speak with me regarding Baldon and our EIS. We also appreciate your submission.

As discussed, I am writing to confirm our phone conversation as follows

- The recommendations outlined in the FRNSW submission are considered post-approval requirements, and we believe that a meeting would be more beneficial once we have received the planning permit.
- Additionally, as mentioned during our call yesterday, I would like to confirm that the FSS will also be provided at the post-approval stage.

I would appreciate your response acknowledging this information.
Thank you,

Kind Regards,

Vineeta Lal
Project Developer



GOLDWIND AUSTRALIA PTY LTD

ACN: 140 108 390

Level 4, North Tower Building, 485 La Trobe Street, Melbourne, VIC 3000

E-mail: vineetalal@goldwindaustralia.com

M. +61 0400 500 928

www.goldwind.com

From: Vineeta Lal
Sent: Tuesday, December 3, 2024 9:55 AM
To: firesafety@fire.nsw.gov.au
Subject: Attn Senior firefighter Scott Zucchetto FRN22/1991 BFS24/5032 8000037262

Dear Scott,
I hope this message finds you well.

I am writing to you regarding the FR NSW submission on the Environmental Impact Statement (EIS) for the Baldon Wind Farm, located within the Murray and Hay Local Government Areas (SSD-40138508). We are currently reviewing all submissions received in response to our EIS and preparing for engagement and feedback from authorities such as yourselves.

Could you kindly advise on the best time to arrange a meeting to discuss your advice and submissions, as referenced above? We would greatly appreciate the opportunity to address your comments and provide additional information about our BESS product.

Thank you for your time, and I look forward to hearing from you.

Kind Regards,

Vineeta Lal
Project Developer



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Level 4, North Tower Building, 485 La Trobe Street, Melbourne, VIC 3000

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www.goldwind.com

Mark Terei

Subject: Baldon Wind Farm (SSD-40138508)- meeting with Heritage NSW re approach to RtS
Location: Microsoft Teams Meeting
Start: Thu 19/12/2024 9:00 AM
End: Thu 19/12/2024 10:00 AM
Show Time As: Tentative
Recurrence: (none)
Organizer: Kirsten Bradley

Hi Corey,

As per our conversation I just wanted to lock in a meeting to discuss a few of the comments provided by Heritage NSW on the Baldon Wind Farm ACHA and the proposed approach to addressing them.

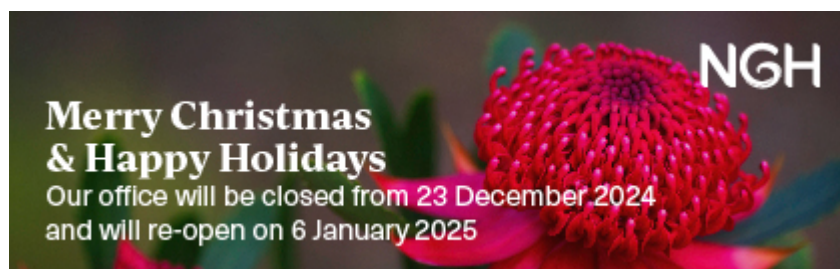
I'll provide a brief agenda for the meeting in the coming day or two to flag the main items we wanted to discuss but just wanted to ensure we could lock this in before the end of the year. If your able to also forward this meeting request onto Marika as you mentioned it would be appreciated as I don't have a direct email.

Thanks again for fitting this meeting in with NGH and Goldwind, especially as the week winds down before the holiday shutdown period.

Cheers,

Kirsten Bradley
Principal Heritage Consultant

m: 0409 002 289 p: 02 6280 5053
e. kirsten.b@nghconsulting.com.au
a. Unit 8, 27 Yallourn Street, Fyshwick, ACT 2609
w. nghconsulting.com.au | [Our commitment to reconciliation](#)



Microsoft Teams [Need help?](#)

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Baldon Wind Farm – Meeting Agenda

Date and time: 9am Thursday 19 December 2024

- 1. Introduction of persons in attendance**
- 2. Purpose of meeting:** To discuss specific items in the comments on ACHA with Heritage NSW to seek clarification and input on proposed approach to address or comment on these by NGH
- 3. Heritage NSW comments to discuss in order of item number**

Item number	Heritage NSW comment	NGH reply to discuss
1	The ACHAR specifies that the Development Corridor is largely confined to landscapes which generally have deflated surfaces and areas considered to have negligible potential for intact subsurface deposits. Consequently, no subsurface test excavation of potential archaeological deposits (PADs) was determined to be warranted within the proposed Development Corridor. Given the predictive model notes that subsurface deposits are most likely to occur <i>"within areas of elevated flat land associated with ephemeral drainage lines, red sandy rises, sand hills or within source bordering dune systems"</i> pg.41 and these landforms are recognised to exist within the Project Area, please provide further justification for why test excavations (both in association with the identified sites and in other areas where no surface evidence is present) are not required to inform the ACHAR in accordance with the SEARs. Considering the ACHAR states that an assessment of contour and Digital Elevation Modelling (DEM) data were used to inform predictive modelling around the likelihood of PADs, detailed mapping to illustrate the micro topographic features identified through this analysis may be used to support the predictive model and the conclusion for negligible potential for intact subsurface deposits with the Development Corridor. If adequate justification is not provided, Heritage NSW recommends that a program of test excavation be conducted, with the timing of any such program to be subject to discussion.	Discuss approach for the justification for why test excavations have not occurred and avoidance of PADs sites (except for those with undetermined impacts). Clarify request for DEM mapping as it is unlikely to significantly value add in comparison to the survey effort completed for this project to define and site and PAD boundaries.
2	Please provide additional information regarding the 'Higher Sensitivity Areas' that have been identified within the Project Area including: how these areas were identified and defined, what the sensitivity is in relation to (e.g., potential for burials or other cultural materials such as stone artefacts), and the specific reasons for why these areas are not considered to be PADs, despite recommending "a limited program of sub-surface test excavation" (p.118 of Archaeological Report [AR]) if works extend into the higher sensitivity area surrounding the gypsum extraction area. Where these areas are assessed as having the potential to contain Aboriginal objects and/or values, additional investigation will be required to ensure adequate consideration of their significance and whether they have the potential to be directly or indirectly harmed by the proposed development.	Discuss additional information regarding the 'Higher Sensitivity Areas'" and approach by NGH to clarify in text these areas which were commented on and/or identified by Aboriginal community members during survey.

Item number	Heritage NSW comment	NGH reply to discuss
8	Please update the impact assessment presented in the ACHAR to distinguish between 'Total' and 'Partial' degree of harm in accordance with Requirement 11 of the Code of Practice.	Seek clarification on comment. Is this just pulling in the summary of impact table from the ATR into the ACHA?? If reference is to the impact table currently in the appendix of the ATR confirm if it ok for a reference to the ATR to be included in the appropriate section of the ACHA rather than duplication of table given size of document??
12	Please provide additional or updated mapping to illustrate the location of the areas associated with undetermined impacts to support the impact assessment. This may be achieved using mapping conventions such as different shading for areas associated with powerline works.	What is the proposed outcome of this information? What does it add to the report? This comment suggests that HNSW require a close up map of all 21 locations with undetermined impacts. NGH note that this will increase the size of the document substantially. Is there another way to display this which is suitable.
18	Several recommendations include a requirement for monitoring for potential burials during initial ground disturbance works by the Registered Aboriginal Parties (RAPs) (e.g. Recommendations 14 and 15). Please provide an indicative methodology for this.	Seek indication from HNSW on how much detail they want and how this would be practically implemented post approval by Aboriginal parties, including who has oversight.
19	Several recommendations mention that test excavations or sub-surface excavations may be required depending upon: (a) the final designs for the overhead powerlines (Recommendation 8), (b) if the gypsum extraction works extend outside of the area of low sensitivity (Recommendation 13), or (c) if hearths cannot be avoided (Recommendation 16). Please provide a methodology for the archaeological excavation proposed post approval and the process that will be undertaken to assess the results of the test excavation. This methodology must be developed in consultation with the RAPs and must include a) Detail of excavation procedure proposed. b) Criteria/triggers for the significance assessment of sites considering the results of test excavation and determination of appropriate management and mitigation measures. c) Provisions for the conservation and avoidance of highly significant Aboriginal cultural heritage that may be identified during the test excavations. d) Consideration and provisions for the presence of burials in subsurface contexts which were identified as a potential site type on the Hay Plain within the predictive model.	Wish to discuss comment as NGH believe this requested methodology should be added into the CHMP requirements and occur post approval when final designs are known to ensure methodology appropriate, and this can include RAP review as part of the CHMP. Confirm if HNSW support this response.

Item number	Heritage NSW comment	NGH reply to discuss
24	Please update Figure 2-10 in the ACHAR to include AHIMS identifiers and site boundaries.	Wish to discuss what is the proposed outcome of this information given sites outside the Project Area? NGH note that the sites within the Project Area were labelled in Figure 2-11 and it is not believed to be appropriate to label or show the boundary of all sites from within the AHIMS search. Would it be more appropriate to label site within ie 50m of the Project Area. As AHIMS only has site point data we do not have shapefile data for the boundaries available.

4. Actions (if required)

Mark Terei

From: Natasha HERRON <Natasha.Herron@dcceew.gov.au>
Sent: Thursday, 16 January 2025 5:52 PM
To: Vineeta Lal; Medard Boutry; Kristina Yan; Mark Terei; Ryan GODWIN-WISEMAN; Louiza ROMANE; David Canterbury; Renae Gifford
Cc: Tom Fletcher; Brooke Marshall; Julie Gooding
Subject: RE: Baldon Wind Farm (SSD-40138508)- EIS Submissions [SEC=OFFICIAL]

OFFICIAL

Hi Vineeta et al

I have just had a look at the referral decision for Baldon Wind Farm and found that we didn't make Listed Migratory species a controlling provision in relation to this project, which means once NSW provides us with their assessment of the project impacts, we will be making our decision on the acceptability of impacts from the proposed action in relation to Listed threatened species and communities only.

However, there are several Listed species that we did ask to be considered in the EIS assessment that are also listed migratory species. They are:

- Curlew Sandpiper (*Calidris ferruginea*) - Critically Endangered
- Common Greenshank (*Tringa nebularia*) - Endangered
- Latham's Snipe, Japanese Snipe (*Gallinago hardwickii*) - Vulnerable
- Sharp-tailed Sandpiper (*Calidris acuminata*) – Vulnerable.

The listing status for these birds has not changed and your assessment should consider whether significant impacts to these species are likely based on the criteria for listed in the the Significant Impact Guidelines 1.1.

Natasha

OFFICIAL

From: Vineeta Lal <vineetalal@goldwindaustralia.com>
Sent: Thursday, 16 January 2025 10:46 AM
To: Medard Boutry <medardboutry@goldwindaustralia.com>; Kristina Yan <kristinayan@goldwindaustralia.com>; Mark Terei <markterei@goldwindaustralia.com>; Natasha HERRON <Natasha.Herron@dcceew.gov.au>; Ryan GODWIN-WISEMAN <Ryan.Godwin-Wiseman@dcceew.gov.au>; Louiza ROMANE <Louiza.Romane@dcceew.gov.au>; David Canterbury <david.c@nghconsulting.com.au>; Renae Gifford <renaegifford@goldwindaustralia.com>
Cc: Tom Fletcher <tom.f@nghconsulting.com.au>; Brooke Marshall <brooke.m@nghconsulting.com.au>; Julie Gooding <julie.g@nghconsulting.com.au>
Subject: RE: Baldon Wind Farm (SSD-40138508)- EIS Submissions

Dear all,

Please find attached agenda for our discussion this afternoon.
Looking forward to our call.

Thank you,

Kind Regards,

Vineeta Lal
Project Developer



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ACN: 140 108 390

Level 4, North Tower Building, 485 La Trobe Street, Melbourne, VIC 3000

E-mail: vineetalal@goldwindaustralia.com

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-----Original Appointment-----

From: Vineeta Lal

Sent: Friday, 10 January 2025 9:32 AM

To: Vineeta Lal; Medard Boutry; Kristina Yan; Mark Terei; Herron, Natasha; Ryan.Godwin-Wiseman@dcceew.gov.au; Louiza ROMANE; David Canterbury; Renae Gifford

Cc: Tom Fletcher; Brooke Marshall

Subject: Baldon Wind Farm (SSD-40138508)- EIS Submissions

When: Thursday, 16 January 2025 3:30 PM-4:30 PM (UTC+10:00) Canberra, Melbourne, Sydney.

Where: Microsoft Teams Meeting

Dear All,

As discussed, proposing a session to discuss Baldon's EIS submissions and plains wanderers.
I will share the agenda & questions early next week.

Thank you,
Vineeta

Microsoft Teams [Need help?](#)

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Meeting ID: 480 356 044 979

Passcode: cP6oZ9W2

For organizers: [Meeting options](#)

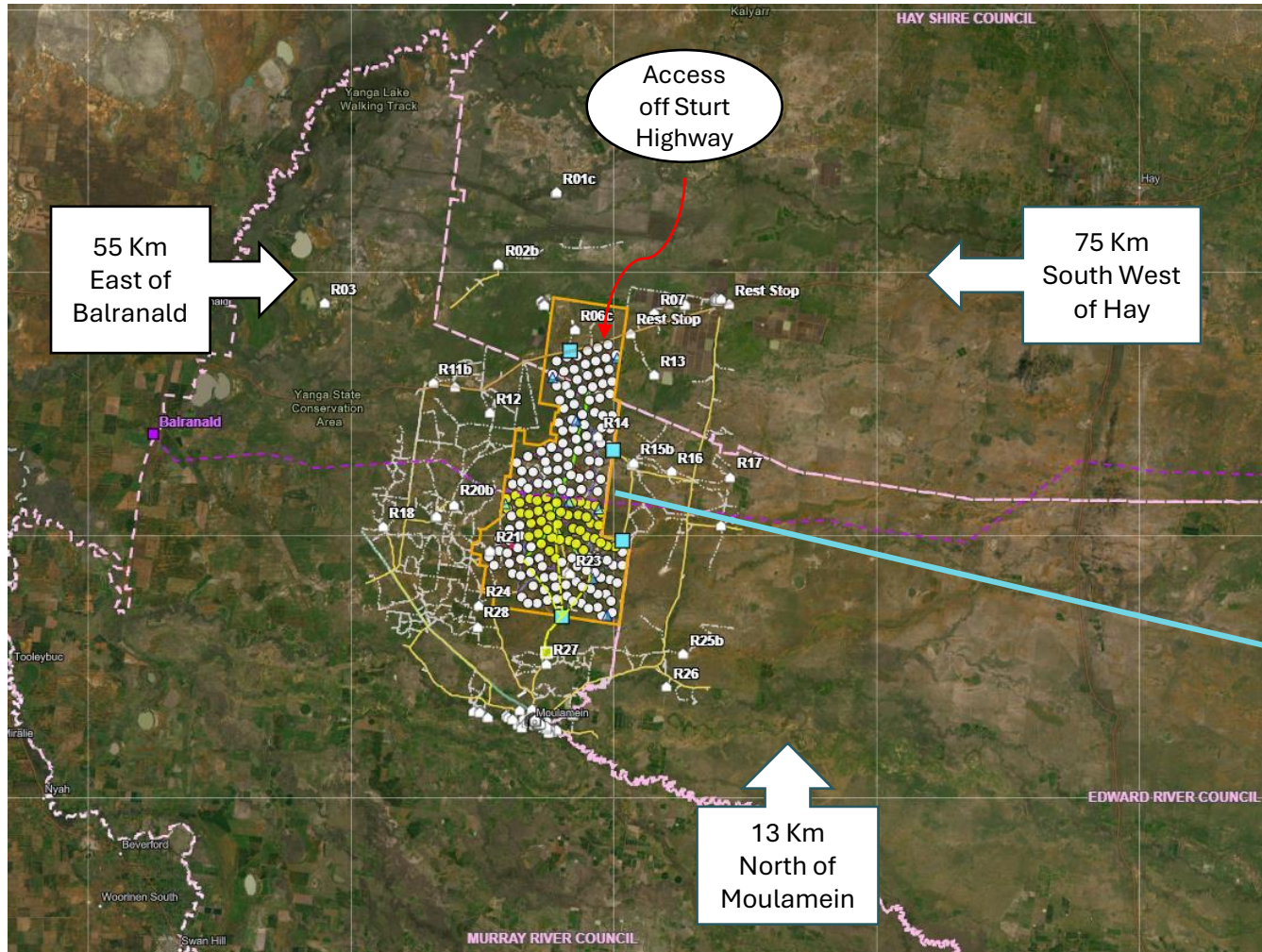
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Baldon Wind Farm & DC Coupled BESS

Goldwind Australia

16 Jan 2024

Project Details - LGAs

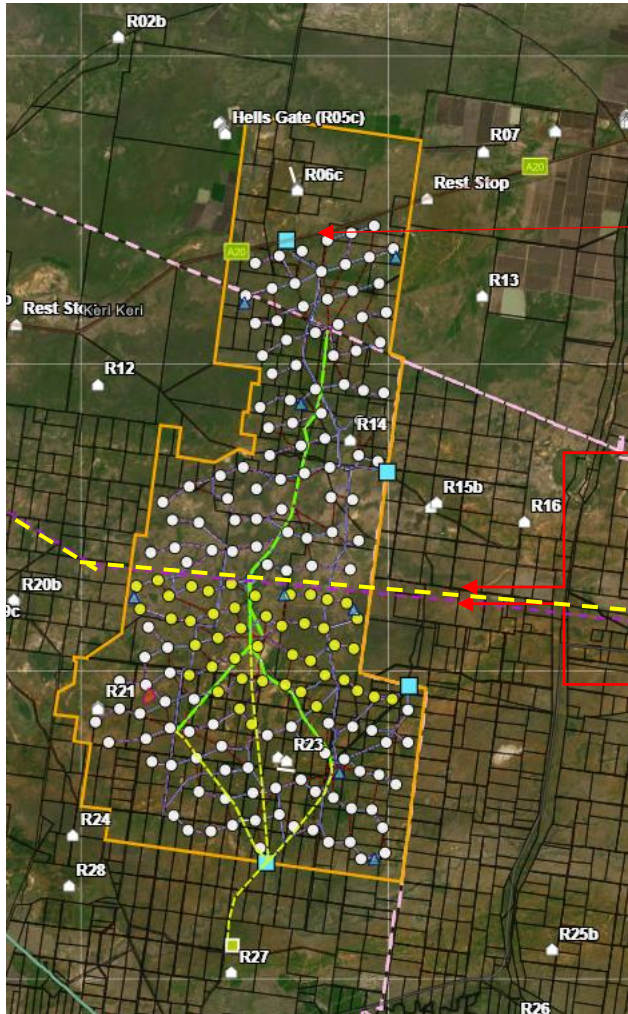


- Baldon Wind Farm is located 13km north of Moulamein, 55km east of Balranald, and 75km southwest of Hay
- The Project is situated within the Riverina-Murray region, with the majority located in the Murray River Shire (LGA) and the northern part within the Hay Shire LGA. The project is within the NSW South West Renewable Energy Zone (SW REZ)

Baldon
Wind
Farm



Project Details



Site Entry Via
Sturt Highway

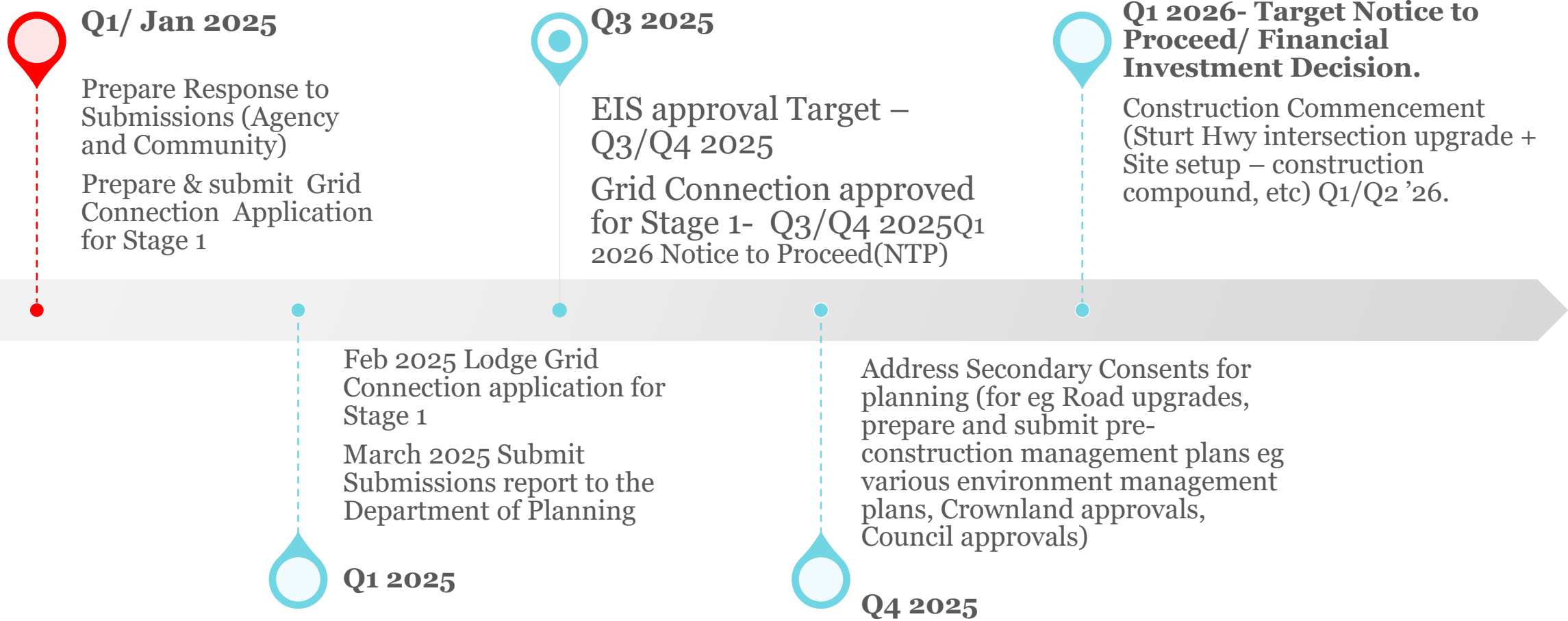
Proposed T-Line
PEC- currently
under construction

Existing
Transmission line-
X5

- 1440MW Wind Farm proposed with Goldwind's DC-Coupled BESS technology – Stage 1: 360MW with 64MW 2hr BESS
- EIS submitted to DPHI mid 2024. Bilateral Agreement Pathway with DCCEE – Submission Report being drafted

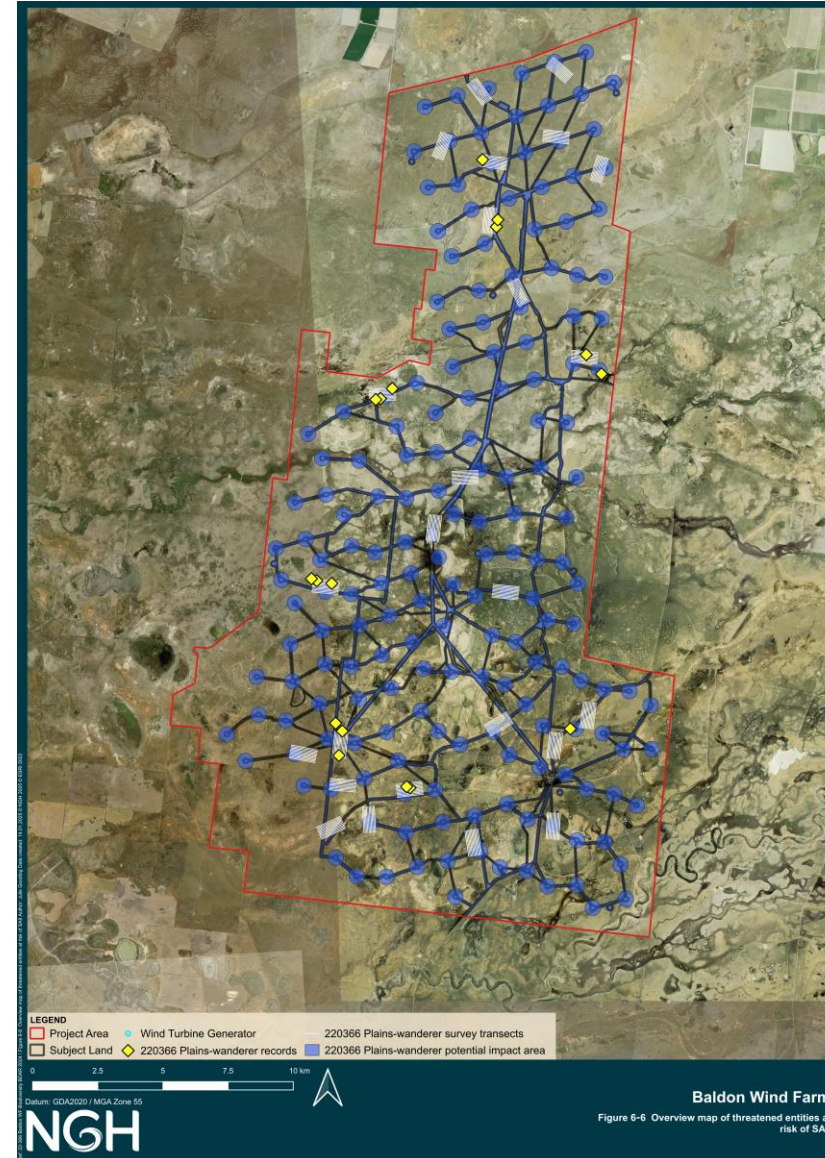


Baldon WF Project Timeline



EIS Key Matters

- Plains wanderer
 - EIS survey results and Submissions Report updates
 - Potential impacts and mitigation measures
 - DCCEEW Plains wanderer SW REZ habitat impacts project
- Mitigation measures
 - Establishment of a Pest Management Plan to target pest animal species that impact Plains-wanderer (*Pedionomus torquatus*) (i.e cats, foxes). This would involve pest animal control as well as monitoring.
 - Limit vehicle speeds to 40 km/h to reduce risk of vehicle strike with Plains-wanderer (*Pedionomus torquatus*) or other threatened fauna.
 - Targeted pre-clearance surveys will be conducted for each section of clearing and works would cease temporarily if the species or its nest is detected and at risk of harm
 - To address unknown impacts and contribute to future understanding of Plains-wanderer, develop a post construction monitoring plan of Plains-wanderer occupancy within the wind turbine locality
 - Potentially offering funding support for research into the potential indirect impacts of wind turbines to Plains-wanderer in the region



EIS Key Matters

- Threatened Flora
 - TECs – *Natural Grasslands of the Murray Valley Plains* CEEC – direct impact (1.12ha).
 - Threatened flora species – direct impacts to Chariot Wheels (*Maireana cheelii*) (64.7ha) and Mossgiel Daisy (*Brachyscome papillosa*) (321.1ha).
 - *Eleocharis obicis* incidental sighting and new adjacent records. Will need to be assumed present in associated PCTs.
 - Spring 2024 surveys have not detected Winged Peppergrass (*Lepidium monoplacoides*) in development footprint.
 - Mitigation measures;
 - Clear physical demarcation of boundary between retained and cleared areas, including threatened flora habitat.
 - Induct all staff prior to construction to identify vegetation to be retained, prevent inadvertent damage and reduce soil disturbance.
 - Pre-construction surveys for *Brachyscome papillosa* and *Maireana cheelii* to inform detailed design to minimise footprint where possible in areas of core habitat, such as micro-siting for cabling routes or reducing track width.
 - Seed bank and topsoil protection protocols, to protect threatened flora seedbank to maximise natural recolonisation of areas subject to disturbance.
 - Disturbed areas must be rehabilitated as soon as practicable and with consideration to native revegetation requirements.



EIS Key Matters



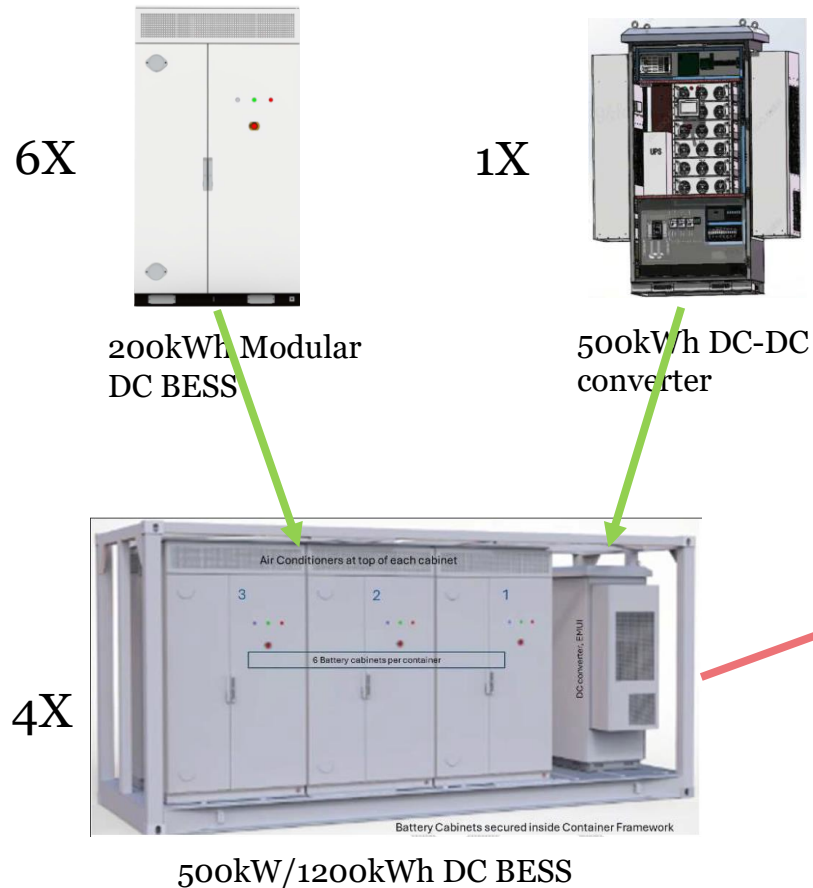
- Other Threatened Fauna
 - Threatened bird species – habitat loss and fragmentation to Southern Whiteface, Pink Cockatoo, Blue-winged Parrot (foraging habitat), South-eastern Hooded Robin.
 - Turbine Strike (Moderate Risk) – Blue Winged Parrot
 - Turbine Strike (Low Risk) – Southern Whiteface, Pink Cockatoo, South-eastern Hooded Robin. Species fly below RSA height.
 - 12 Migratory species – turbine strike (low risk)
 - Southern Bell Frog – habitat loss (39.3ha within 200m from farm dams). Indirect impacts from vehicle strikes.
 - Mitigation Measures
 - Clearing of HBTs be timed to avoid critical life cycle events, such as breeding and nursing and pre-clearing survey procedures, and staged clearing procedures for HBTs, including the presence of a trained ecologist or licensed trained fauna spotter catcher during clearing events.
 - Clear physical demarcation of boundary between retained and cleared areas, aquatic areas.
 - Relocation of habitat features (e.g. fallen timber, hollow logs etc) within construction footprint to adjacent retained habitat.
 - No dams would be removed by the proposal to minimise impacts to Southern Bell Frog (*Litoria raniformis*) that rely on water bodies.
 - Using hygiene protocols to prevent the spread of weeds or pathogens between infected and uninfected areas
 - Vehicle impacts will be reduced by limiting vehicle speeds to 40 km/h to reduce risk of vehicle strike. Vehicle speeds will be further reduced during wet weather and night works, to reduce the risk of vehicle strike with Southern Bell Frog (*Litoria raniformis*). Vehicle movement will be restricted to established tracks only.

Goldwind DC coupling BESS GFM WTG Case study

Wind Farm, Moorabool, Australia;

- The first Goldwind pilot DC coupling BESS GFM WTG oversea (in progress, estimated COD time April 2026)

- ✓ Upgrade the existing 3S WTG in WF
- ✓ Provide grid forming functions
- ✓ Provide energy arbitrage and peak shaving functions
- ✓ Embed the BESS to existing WF SCADA system).



Mark Terei

From: Les Seddon <les.s@nghconsulting.com.au>
Sent: Monday, 13 January 2025 4:39 PM
To: water.assessments@dpie.nsw.gov.au
Cc: rob.brownbill@dpie.nsw.gov.au; David Canterbury; Mark Terei
Subject: Baldon Wind Farm consultation (your ref OUT24/14141)
Attachments: EIS Advice - DCCEEW Water.pdf

Dear Rob and Water Assessment Team,

NGH are assisting Goldwind Australia with the response to submissions for Baldon Windfarm.

We would like to request a brief meeting to discuss our planned approach to recommendation/item 1.3 of your advice relating to waterfront land.

More specifically we would like to discuss challenges around defining waterfront land in the Project's environmental setting and the Flooding Assessment currently underway.

A meeting later this week would be appreciated where possible.

Kind regards
Les

Les Seddon
NSW Regional Lead - Planning

m: 0425 283 868 p: 02 8202 8333 (Ext 304)
e. les.s@nghconsulting.com.au
a. 2 Dick Street, Newcastle West, NSW 2303
w. nghconsulting.com.au | [Our commitment to reconciliation](#)
Tuesday to Friday, 9:00 am to 5:00pm



Mark Terei

Subject: Baldon Wind Farm Waterfront Land
Location: Microsoft Teams Meeting

Start: Fri 17/01/2025 11:00 AM
End: Fri 17/01/2025 11:45 AM
Show Time As: Tentative

Recurrence: (none)

Organizer: Les Seddon

Hi Robert,

As requested setting up this time to talk through the Baldon Wind Farm Project Team's response to DCCEE's submission regarding Waterfront Land

Kind regards
Les

Les Seddon
NSW Regional Lead - Planning

m: 0425 283 868 p: 02 8202 8333 (Ext 304)
e. les.s@nghconsulting.com.au
a. 2 Dick Street, Newcastle West, NSW 2303
w. nghconsulting.com.au | [Our commitment to reconciliation](#)
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Baldon Wind Farm

DCCEEWS NSW RTS consultation
Jan 2025

Goldwind Capital (Australia) Pty Ltd

Agenda

NGH

- Intros
- Baldon Wind Farm overview
- Current understanding of hydrology
- SEARs and assessment to date
- Ongoing work
- DCCEEW response
- Waterfront Land discussion
- Next Steps



Acknowledgement of Country



At NGH, we recognise Aboriginal and Torres Strait Islander peoples as the first people of Australia.

We acknowledge the traditional owners of this land and pay our respect to Elders past, present and emerging. We recognise that the First Nations people of Australia have traditionally managed the resources of this land in a sustainable way, and that they are the original stewards of the Australian environment.

We understand the importance of increasing our knowledge and understanding of the connection between First Nations peoples across Australia and the lands on which we live and work, including the lands where NGH offices are located:

Project site and surrounds
located on lands of

Nari Nari,

Mutthi Mutthi

Watthi Watthi

Wemba Wemba

Traditional owners/language
groups

Bega, Yuin

Brisbane, Turrbal & Yuggera

Canberra, Ngunnawal

Gold Coast, Yugambeh

Sydney, Gadigal

Wodonga, Wiradjuri

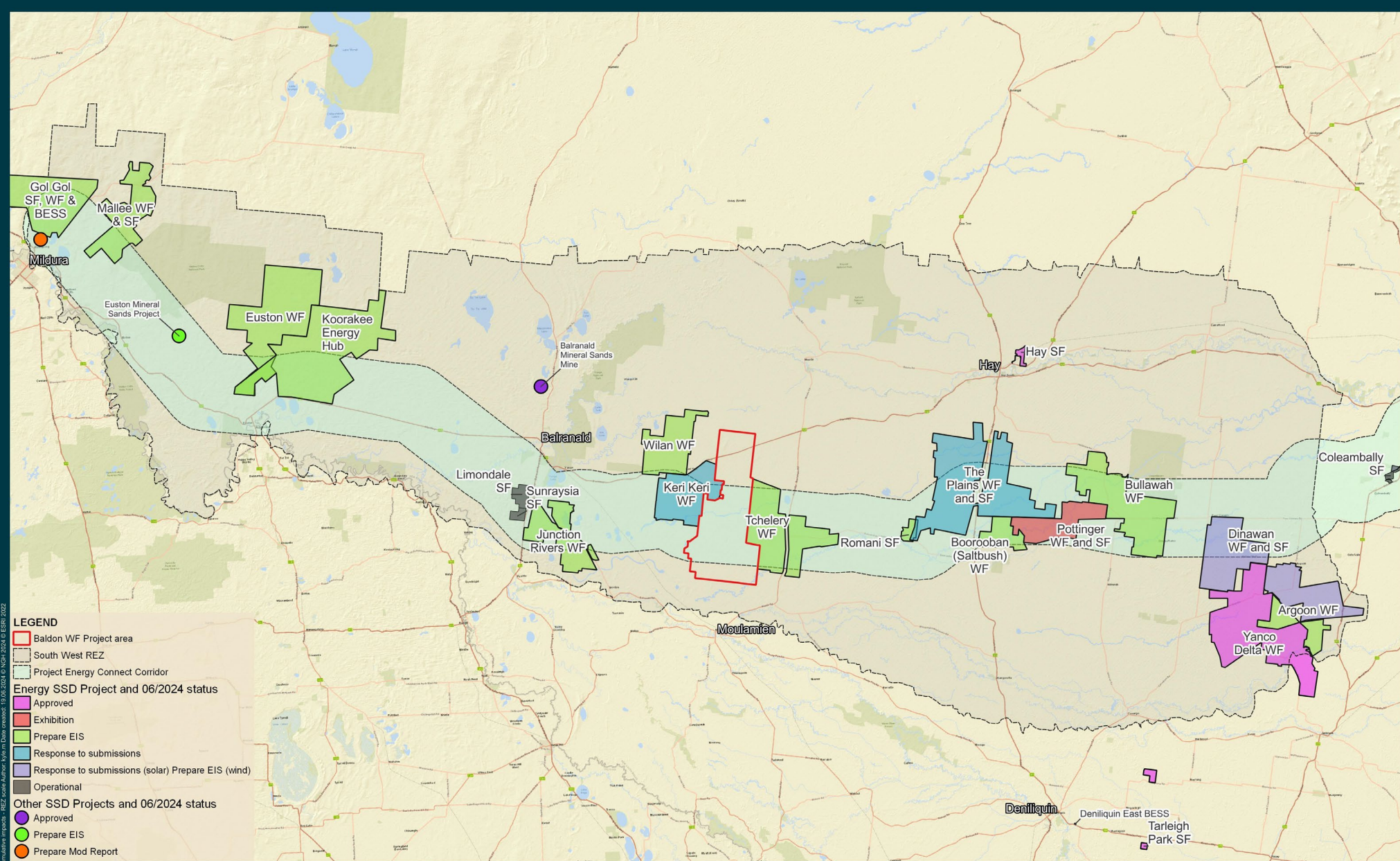
Sunshine Coast, Kabi Kabi

Melbourne, Wurundjeri &
Boonwurrung

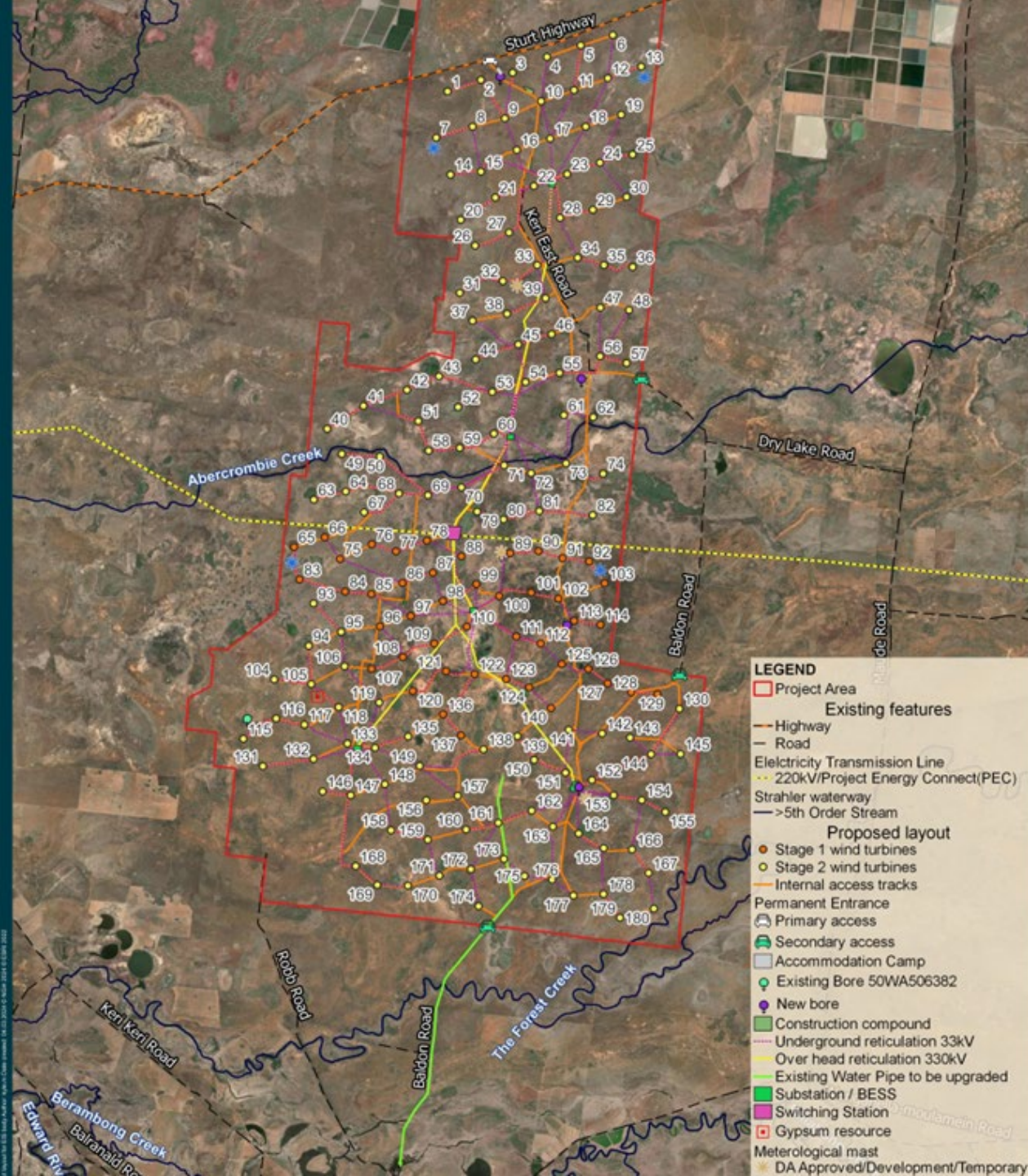
Newcastle, Awabakal & Worimi

Wagga Wagga, Wiradjuri

Townsville, Bindal & Wulgurukaba



- Capacity ~1,400 MW
- 180 WTGs
 - ~8MW
 - Max tip height 300m
- BESS ~200MW/400MWh
- Project Area 46,260 ha
 - Development (survey) corridor 2,840 ha
 - Construction footprint 820 ha
 - Operation footprint 350 ha
- Key issues
 - Biodiversity
 - Aboriginal cultural heritage
 - Social



○ Tier 1 Aboriginal heritage sites

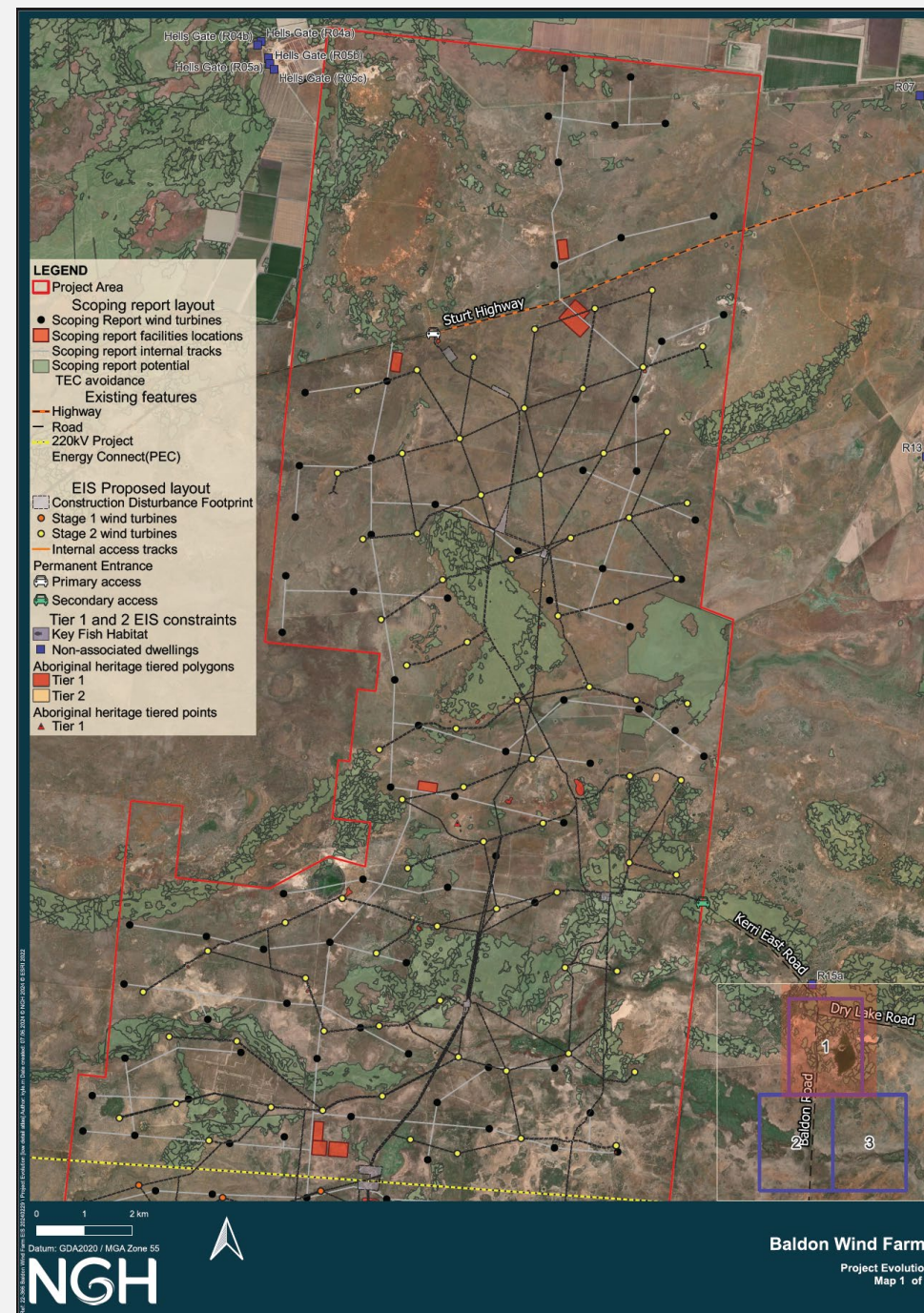
- Anthropogenic Mound Features with or without human remains, Human Remains and/or site complexes that contain human remains and Culturally Modified Tree.

○ Tier 2 Aboriginal heritage sites

- Mounds, culturally modified trees and Potential Archaeological Deposits (PADs).

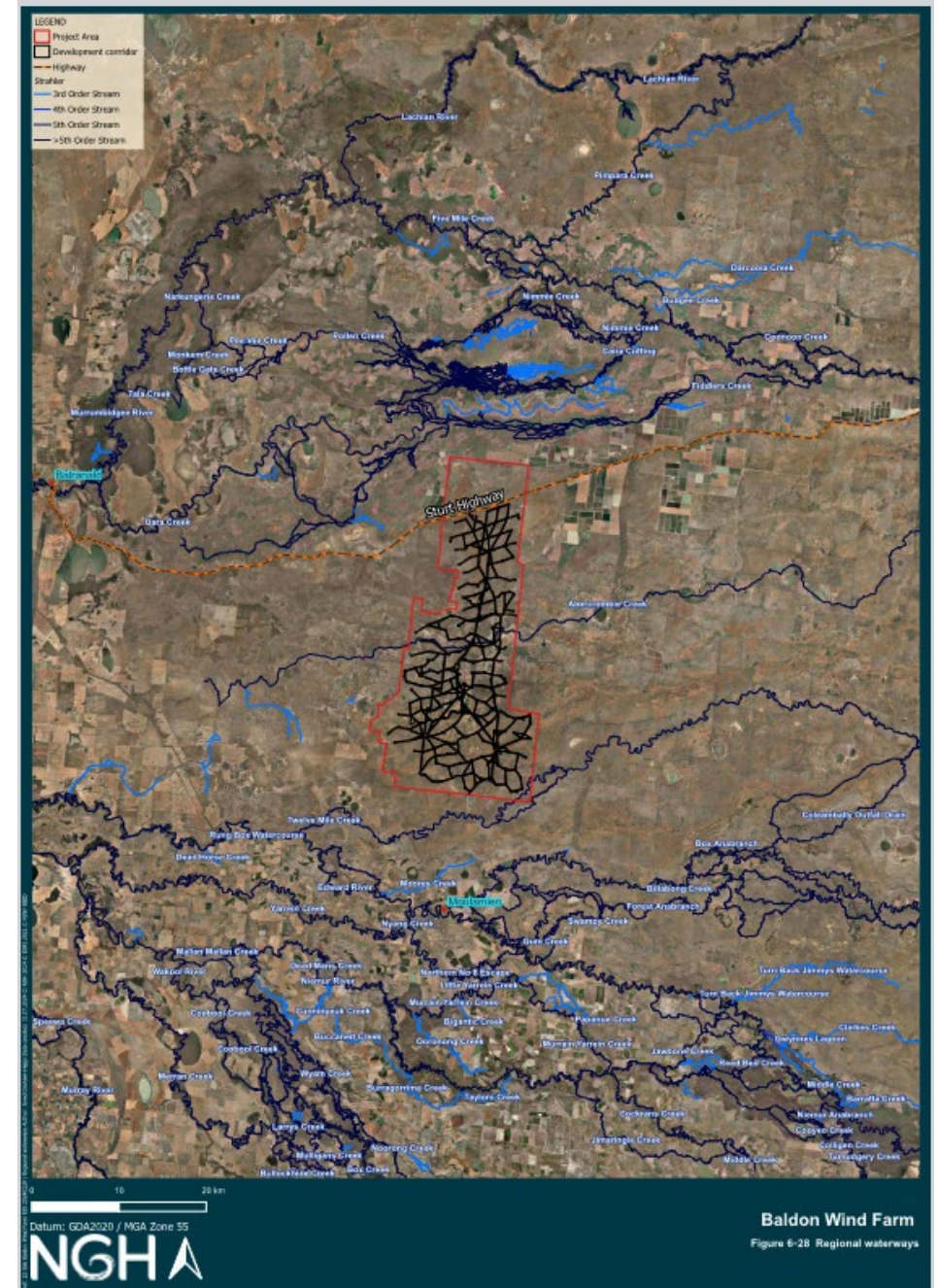
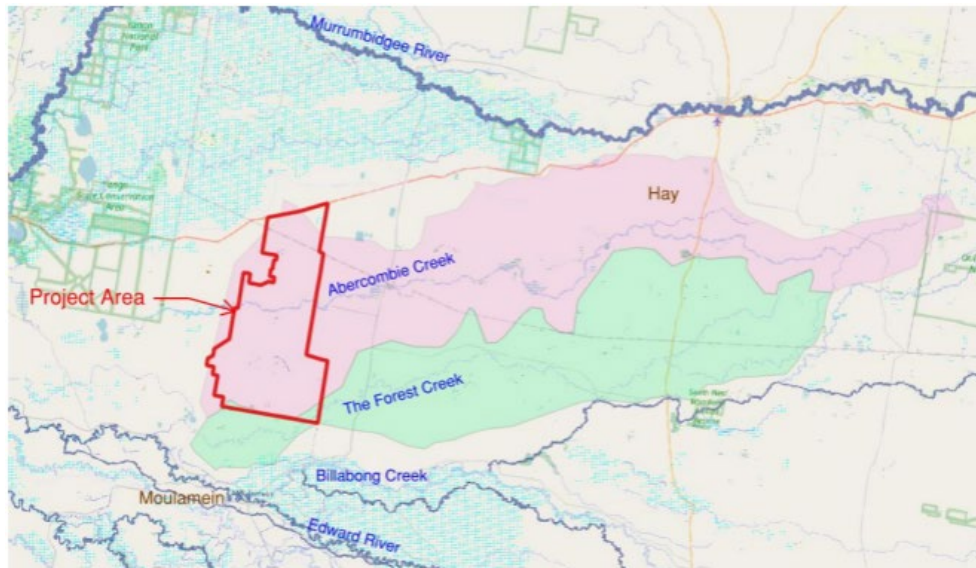
○ Tier 2 Biodiversity values including habitat for:

- Mossgiel Daisy (*Brachyscome papillosa*) – Prolific and widespread in the north of the site, including areas of dense and more sparse populations.
- Chariot Wheels (*Maireana cheelii*)- Prolific and widespread in the south of the site, including areas of dense and more sparse populations.
- Southern Bell Frog (*Litoria raniformis*) - Prolific and widespread in dams within the site
- Plains-wanderer (*Pedionomus torquatus*) - Identified as likely to use most of the site
- Little Eagle (*Hieraaetus morphnoides*) – One confirmed nest and one potential nest identified



Hydrology

- Situated on floodplains between Murrumbidgee and Edward Rivers
- Very flat, with limited low relief drainage lines, negligible incision and subject to movement (aerials differ to mapping)
- Semi permanent water = man made dams with pumped water supplies
- Most significant feature is Abercrombie Creek (9th order)
 - Ephemeral, predominantly dry, with slightly lower elevation to surrounding areas
 - Bed level drops ~ 1.5m over 14km
 - Not sharply defined, potentially causing large floodplain areas to be inundated during flood events. However, shallow and slow-moving due to the flat slope
- Natural depressions throughout, with topographically named Gunyah Swamp and Rawley's Lake clustering scattered depressions
- Water movement after flooding is slow creating temporary inundations such as Gunyah Swamp



*where the project involves works within 40 metres of the high bank of any river, lake or wetlands (collectively waterfront land), **identify likely impacts** to the waterfront land, and **how the activities are to be designed and implemented** in accordance with the*

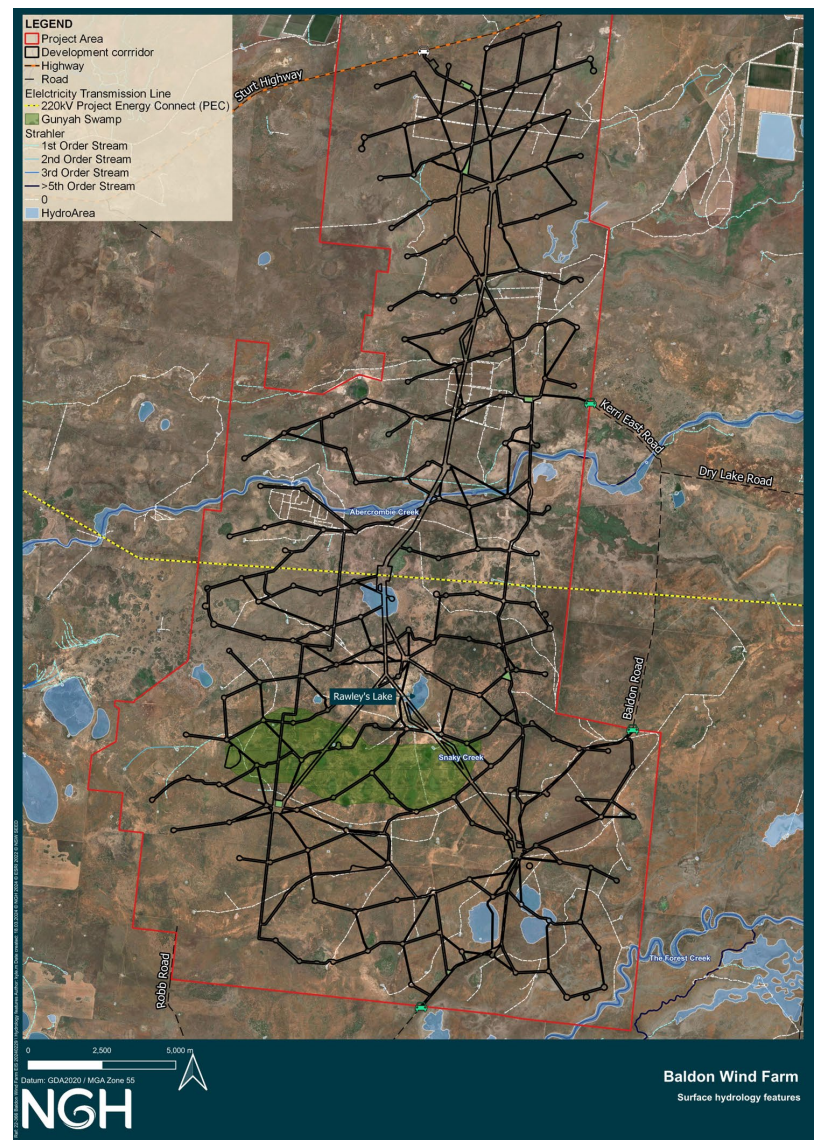
- *DPI Guidelines for Controlled Activities on Waterfront Land (2018) and*
- *(if necessary) Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (DPI 2003); and*
- *Policy & Guidelines for Fish Habitat Conservation & Management (DPI, 2013)*

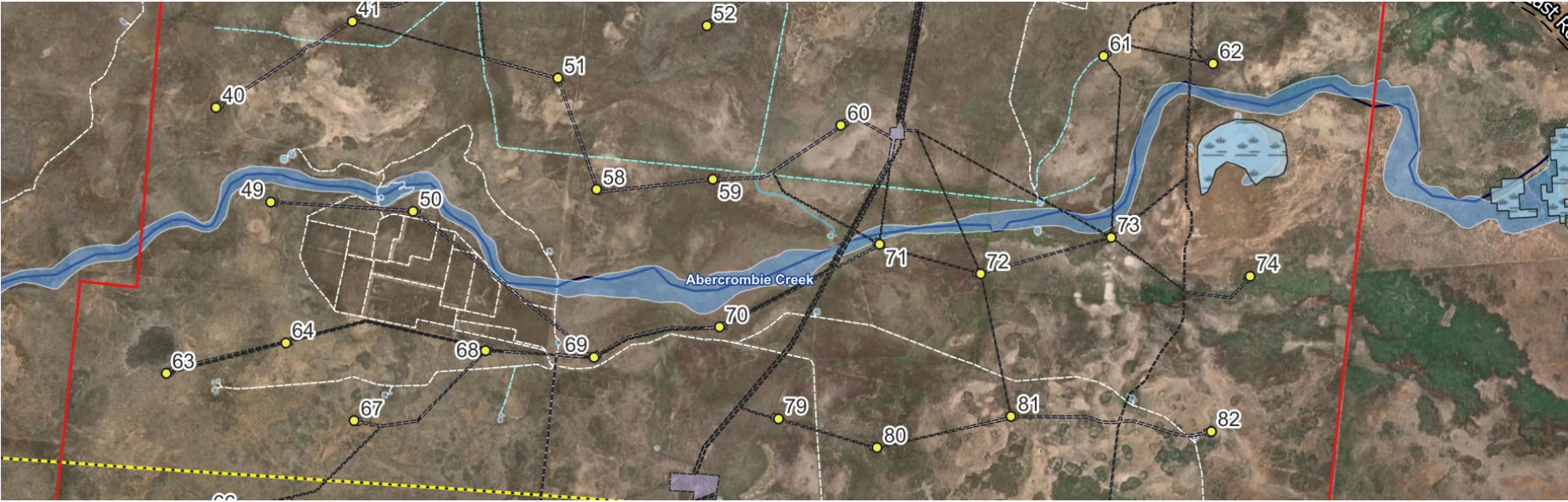
- Hierarchy of issues- current design arrived at to minimise bio and heritage impacts
- Qualitative Risk based approach
 - Low risks identified with appropriate (and feasible) mitigation strategies with high confidence levels
 - Looked at different project components and potential impact on waterfront land
 - Waterway Crossings only unmitigated high risk
 - > Considered low risk with best practice guidelines applied to restoration and design criteria to maintain hydraulic flow and local hydrology.
 - Wind turbines found to be low unmitigated risk (much less than 1% of site) and readily managed in design
- Exact confirmation of waterfront land boundaries impossible
- Mitigation based largely on performance objective commitments during detailed design so runoff, flood extent and velocities are not substantively changed. With no offsite hydrological impacts.
- Key uncertainty was flood model.

Section 4.41 of the EP&A Act - WM Act s89 (water use), s90 (water management work) or s91(2) (controlled activity) approvals not required for approved SSD

Waterfront Land

Present. Very difficult to define. Negligible impacts.





- Flood Assessment
 - Further understand inundation areas
 - Confirm performance objectives and/or inform detailed design
 - runoff, flood extent and velocities are not substantively changed
 - 10% flood immunity may require some building up of access through water ways requiring culverts
- BDAR
 - Confirm biodiversity impacts fully considered

1.3 Recommendation – pre-determination

The proponent should review and amend project's infrastructure to **provide setbacks from waterfront land** in accordance with the Guidelines for Controlled Activities.

Explanation

There are multiple minor and major watercourses, a wetland (Gunyah Swamp), and a lake (Rawley's Lake) within the Project Area.

Support of design and rehabilitation of works within waterways will adherence to the Guidelines for Controlled Activities.

Development corridors, as shown in EIS Figure 6-29 proposing to locate infrastructure within waterfront land, such as wind turbines within Guyah Swamp, Abercrombie Creek and other areas of waterfront land mapped within the project area.

This is not supported as the infrastructure should be setback from waterfront land in accordance with buffer requirements provided in Guidelines for Controlled Activities.

Waterfront land discussion

Waterfront land = *The bed of any river/lake/wetland, together with any land lying between the bed of the river and a line drawn parallel to, and the prescribed distance inland of, **the highest bank** of the river/wetland/lake*

Considerations

- No identifiable incisions/banks or RC/VRZ transition zones
 - ***How would DCCEEW like waterfront land in this unique environment defined/explained better?***
- Infrastructure can be located in Waterfront land with minimal environmental impact
 - ***Is there further information needed that is critical to confirming impacts?***

Next steps

- Report flood assessment findings
 - Confirm performance objectives feasible
 - Confirm negligible impact on broad Waterfront lands
 - spatial definition?

Mark Terei

From: Vineeta Lal
Sent: Tuesday, 21 January 2025 11:43 AM
To: dwebb@hay.nsw.gov.au
Cc: Jack Terblanche; Kristina Yan; Medard Boutry; Mark Terei; Jacqui Mott
Subject: RE: Baldon Wind Farm Update meeting with Hay Shire Council
Attachments: 100311-02_Baldon_WF_Obstacle_Lighting_V1.0_2501080 Draft.pdf

Dear David,

Thank you once again for taking the time to meet with us. We're looking forward to our discussion on Thursday.

Attached is the draft version of the Obstacle Lightning Report for your review and comments. We will finalise this report upon receiving your comments.

Kind Regards,

Vineeta Lal
Project Developer



GOLDWIND AUSTRALIA PTY LTD

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Level 4, North Tower Building, 485 La Trobe Street, Melbourne, VIC 3000

E-mail: vineetalal@goldwindaustralia.com

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-----Original Appointment-----

From: Jacqui Mott <jacquimott@goldwindaustralia.com>

Sent: Friday, 17 January 2025 11:45 AM

To: Jacqui Mott; Jacqui Mott; Vineeta Lal; Kristina Yan; Medard Boutry; dwebb@hay.nsw.gov.au; Mark Terei

Cc: Jack Terblanche

Subject: Baldon Wind Farm Update meeting with Hay Shire Council

When: Thursday, 23 January 2025 11:00 AM-12:00 PM (UTC+10:00) Canberra, Melbourne, Sydney.

Where: Microsoft Teams Meeting

An opportunity to update the Hay Shire Council with regards to the Baldon Wind Farm, meet with General Manager David Webb and Goldwind Team, and also discuss response items from the EIS.

Online and at the Hay Shire Council offices. Agenda also emailed directly.

Microsoft Teams [Need help?](#)

[Join the meeting now](#)



Hay Shire Council

ABN: 84 075 604 155
134 Lachlan Street PO Box 141 HAY NSW 2711
Telephone: 02 6990 1100 Facsimile: 02 6993 1288
Email: mail@hay.nsw.gov.au Website: www.hay.nsw.gov.au

18th February 2025

Baldon Wind Farm Pty Ltd
Goldwind Australia
International Tower One,
Level 25, Tower 1/100 Barangaroo Ave,
Barangaroo NSW 2000

To: Vineeta Lal
Project Developer

Dear Vineeta,

Thank you for the meeting with your development team on January 23, 2025.

During our discussion, we addressed the issues and comments raised by the Hay Shire Council (HSC) regarding Council's responses to the Baldon Wind Farm project's EIS Submission to the NSW Department of Planning, Housing, and Infrastructure (DPHI). I confirm that, in accordance with our discussion, HSC is supportive of the lighting on the wind turbine generating systems (WTGs) and wind turbine meteorological towers (WMTs) as detailed in Version 1.0 of the Baldon WF Obstacle Lighting Report, issued to HSC on 21 January 2025.

Furthermore, HSC supports the installation of low intensity lighting and concurs with the project team that low intensity lighting is preferred over medium intensity lighting to minimise potential visual issues for the surrounding community. The HSC also recommends continued engagement with the Hay Aerodrome users post project approval.

Furthermore, Council acknowledges the responses provided by Baldon Wind Farm, as per the attached document, and supports their inclusion in the project's 'Response to Submissions' report.

We look forward to collaborating with your team at post-approval stage.

Kind Regards

David Webb
General Manager, Hay Shire Council
E: dwebb@hay.nsw.gov.au
M: 0429 693 499

Baldon Wind Farm- Responses to Hay Shire Council Submissions

Comments or issues raised	Response
Council seeks further consultation about damage to local roads (Maude Road) if proposed to be used by heavy vehicles during Project construction.	As per the updated Traffic Impact Assessment (Appendix X) and the Over-Size Over-Mass (OSOM) Route Study (Appendix X), Maude Road is not part of the proposed OSOM route nor a major proposed transport route. As per mitigation measure T1 of the EIS (refer to Table 6-32 of the EIS) a Construction Traffic Management Plan (CTMP) will be prepared and implemented. The TMP will be prepared in consultation with TfNSW and the relevant councils. The TMP would provide additional information regarding: • Traffic volumes, distribution and vehicle types • Identification and confirmation of designated transport routes, access and delivery schedules • Consultation with neighbours and local authorities regarding heavy vehicle and OSOM deliveries • Identification of dilapidation reports to be prepared for roads used frequently by the Project. Dilapidation surveys will be completed for local roads if they are nominated as part of a haulage route (used by heavy vehicles).
Removal of below ground structures to 1.0 m depth.	A Soils, Land and Agriculture Impact Assessment report was prepared as part of the EIS. It is included in Appendix F.7 of the EIS and summarised in Section 6.9 of the EIS. Decommissioning will include removal of all above ground infrastructure or, where infrastructure is unable to be removed, such as wind turbine footings, reinstatement of minimum 0.5 m soil capping (or as agreed otherwise with the landowner). Removal of below ground infrastructure is considered to cause unnecessary ground disturbance after more than 30 years of ground cover establishment and provide marginal benefits to future land use, especially at Baldon which is used for low density sheep grazing.



Hay Shire Council

ABN: 84 075 604 155

134 Lachlan Street PO Box 141 HAY NSW 2711

Telephone: 02 6990 1100 Facsimile: 02 6993 1288

Email: mail@hay.nsw.gov.au Website: www.hay.nsw.gov.au

Hay Shire
COUNCIL

Comments or issues raised	Response
	Areas disturbed during decommissioning will be rehabilitated by replacement of topsoil (or capping material equivalent to surrounding areas) including seeding and soil amelioration if necessary. Either native vegetation or grazing pasture will be reinstated, unless otherwise agreed with the landowner and/or regulatory authorities. A small number of permanent infrastructure may remain in the Project Area, limited to TransGrid assets (electrical substations), any centralised BESS and internal access tracks or hardstand areas that the landholder might wish to retain. In the case of reinstating agriculture land use, soil class and productivity potential would be re-established equivalent to pre-Project levels. These and other rehabilitation provisions for decommissioning are outlined at Table 6-52 of the EIS.
Lighting for WTGs and met masts.	HSC supports the lighting on WTGs as per the approved lighting plan and has a preference for the low intensity lighting ($\geq 200\text{cd}$), which is consistent with the requirements of a number of other windfarms. Refer to the lightning plan attached for the overall project and stage 1 of the Baldon Project.
Local and regional road upgrades to be consulted with Council: Any widening of council roads requires consent from Council and an approved design to the satisfaction of the Council engineer. Tree removal at intersection of Cobb and Sturt Highways – this would not be preferred by Council.	No modifications to Council roads are proposed, however Council advised that a s.138 permit may still be required (in addition to the TfNSW requirements) for the site entry upgrade along the Hume Hwy. This will be sought at the appropriate time. As per Section 3 and Appendix 4 of this report, the Project now proposes to utilise an Over Size Over Mass (OSOM) transport route from Port of Adelaide to the Project site only and is no longer proposing an OSOM route from Port of Newcastle direction. In the unexpected event that Council roads require widening or other modifications in future, Council would first be consulted and the appropriate process would be followed.



Hay Shire Council

ABN: 84 075 604 155

134 Lachlan Street PO Box 141 HAY NSW 2711

Telephone: 02 6990 1100 Facsimile: 02 6993 1288

Email: mail@hay.nsw.gov.au Website: www.hay.nsw.gov.au

Hay Shire
COUNCIL

Comments or issues raised	Response
Any adjustments to PANS-OPS and LSALT is to be undertaken in consultation and agreement with Council as the aerodrome operator.	Feedback from CASA on the additional recommendation for engaging with Airservices Australia and Council as the aerodrome operator regarding the changes to the PANS-OPS and LSALTs will be adopted after the detailed design phase and prior to the relevant WTGs being erected.
Consultation with Hay aerodrome users.	The Aviation Impact Assessment was provided to the Hay Shire Council as the aerodrome operator for feedback in February 2024. Further follow up with the Hay Shire Council on the matter has taken place including a review of the draft Lighting Plan.

Mark Terei

From: Mark Terei
Sent: Thursday, 27 February 2025 6:28 PM
To: David Way; Nicole Brewer; Tatsiana Bandaruk
Cc: Kristina Yan; Vineeta Lal; Medard Boutry
Subject: RE: Baldon Wind Farm Submission Update
Attachments: Baldon WF- Agenda DPHI- 28022025.pdf

Good evening David and team,

Please find attached a more detailed agenda proposed for tomorrow's meeting.

Kind regards,

Mark Terei
Senior Environmental Planner
CEnvP-IA (EIANZ)



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www.goldwind.com/en/australia/

My working hours may not be your working hours. Please do not feel obligated to respond to this e-mail outside of your normal working hours.

-----Original Appointment-----

From: David Way <David.Way@planning.nsw.gov.au>

Sent: Tuesday, 11 February 2025 2:38 PM

To: David Way; Nicole Brewer; Tatsiana Bandaruk; Vineeta Lal; Medard Boutry

Cc: Kristina Yan; Mark Terei

Subject: Baldon Wind Farm Submission Update

When: Friday, 28 February 2025 2:00 PM-2:30 PM (UTC+10:00) Canberra, Melbourne, Sydney.

Where: Microsoft Teams Meeting

Good Afternoon Everyone

I wanted to send through a placeholder to discuss the Submissions Report for the Baldon Windfarm.

Broadly it would be to discuss the a few key aspects for the Report, namely:

1. Transport consideration and TfNSW's submission
2. Biodiversity considerations and BCS' submission
3. Process and timing.

Please let me know if any changes to the meeting time are required. Once the meeting is confirmed, I will send through a more detailed agenda.

Happy to discuss,

Daivd

David Way

Senior Environmental Assessment Officer

Planning and Assessment

Department of Planning, Housing and Infrastructure

T 02 8275 1324 | E david.way@planning.nsw.gov.au

12 Darcy Street Parramatta NSW 2000

www.dpie.nsw.gov.au

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Baldon Wind Farm & DC Coupled BESS-Response to Submissions

Goldwind Australia

28 Feb 2025

Baldon Subs report- Agenda



- TfNSW Submission and Response Strategy
- Biodiversity- Progress & Response Strategy
- Overview of Progress on RtS
- Agency consultation completed
- Project refinements
- Additional assessments
- GWA questions

TfNSW Submission and Response Strategy



Item	TfNSW Ref	TfNSW Submission	Baldon WF Response
A	Key issue 1, Point 1 Attachment 1	Adequately address Project traffic volumes and types / Site entrance design	Updated TIA: Project peak hour / network peak hour, worst case scenario of the two proposed camps, cumulative projects, Project staging (timing of intersection upgrade).
B	Key issue 2, Point 2 Attachment 1	Swept path sketches and strategic concept designs prepared for NSW road modifications (incl site entrance)	Concept design of NSW road upgrades and site access. See Slide 4 and 5
C	Key issue 3&4, Point 3 Attachment 1 Point 4 Attachment 2	Clarify route options and impacts to the State road network across all identified routes / Update high-risk OSOM route assessment for all routes	Reduced route options – one route from Port of Adelaide now (see Slide 6) Updated OSOM Route Study. Consultation commenced with potential utility impacts (NSW), overhead power lines (all States) and for planning approvals in other States (SA and Vic). No rail crossings in NSW. Rail crossing permits and upgrade in SA and Vic – enquiries commenced.
D	Key issue 3, Point 3 Attachment 1	Drainage design	Subject to detailed design post-approval. Typical cross-sections included in Submissions Report.
E	(DPHI)	Environmental assessment of proposed (NSW) road upgrades to be part of planning approval	Environmental (biodiversity and cultural heritage) assessment of two intersections completed for Submissions Report
F	(DPHI)	Private property impacts – Market St Balranald intersection	Property currently for sale – TfNSW and EnergyCo investigating

Road upgrade Concept Design – site access



The following design details have been taken from Austroads Guide to Road Design Part 4A:

Short Channelised Right-turn Treatment (CHR(s)) - Section 7.2.3.

- 1: Design speed of 120km/h.
- 2: Lane widths: 3.5m Sturt Highway through lanes (existing), 3.5m turn lane.
- 3: Minimum lateral movement (A) is 100m.
- 4: Desirable radius of 500m has been used.
- 5: Taper length used is 38.5m.
- 6: Storage length is 30m for one B-Double Vehicle.

Notes:

- Road lighting is not proposed as there are no raised/solid medians.
- Refer to RJA Report for OSOM vehicle swept paths.

Rural Left-turn Treatment (BAL) - Section 8.2.1.

- 1: Design speed of 120km/h.
- 2: Lane widths of 3.5m have been used.
- 3: Formation/carriageway widening is 1.5m.
- 4: Taper length calculates to 25m.
- 5: Minimum length of parallel widened shoulder used from Table 8.1 is 45m.



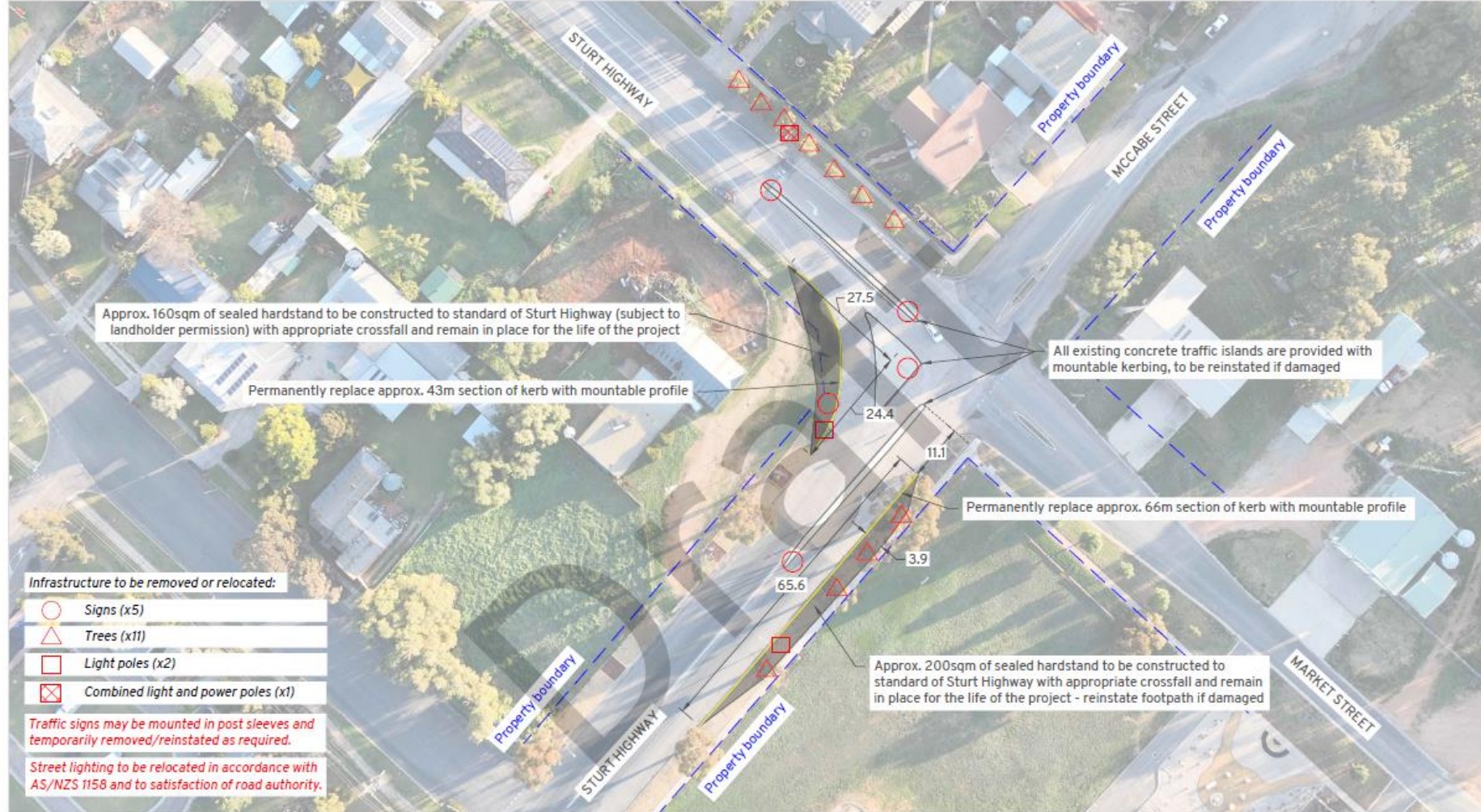
Baldon Wind Farm

Site Access

Strategic Design - CHR(s) And BAL

DRAWN: OM
DATE: 19/01/2025
DWG NO: 550 F01B
SCALE at A3: 1:1000

Road upgrade Concept Design – OSOM route



Notes:

- Property boundaries shown indicatively based on mapping data.
- Vehicle swept paths provided within RJA report and on Sheet BL-2B.
- Traffic signs may be mounted in post sleeves and temporarily removed/reinstated as required.
- Street lighting to be relocated in accordance with AS/NZS 1158 and to satisfaction of road authority.
- Hardstand and mountable kerb to remain for the life of the project to allow for future replacement of turbine components.



Baldon Wind Farm - 90m Blade from Adelaide
KM Index 623.7: Sturt Highway / Market Street, Balranald
Strategic Design

DRAWN: OM
DATE: 19/01/2025
DWG NO: 550 SD-548
SCALE at A3: 1:750

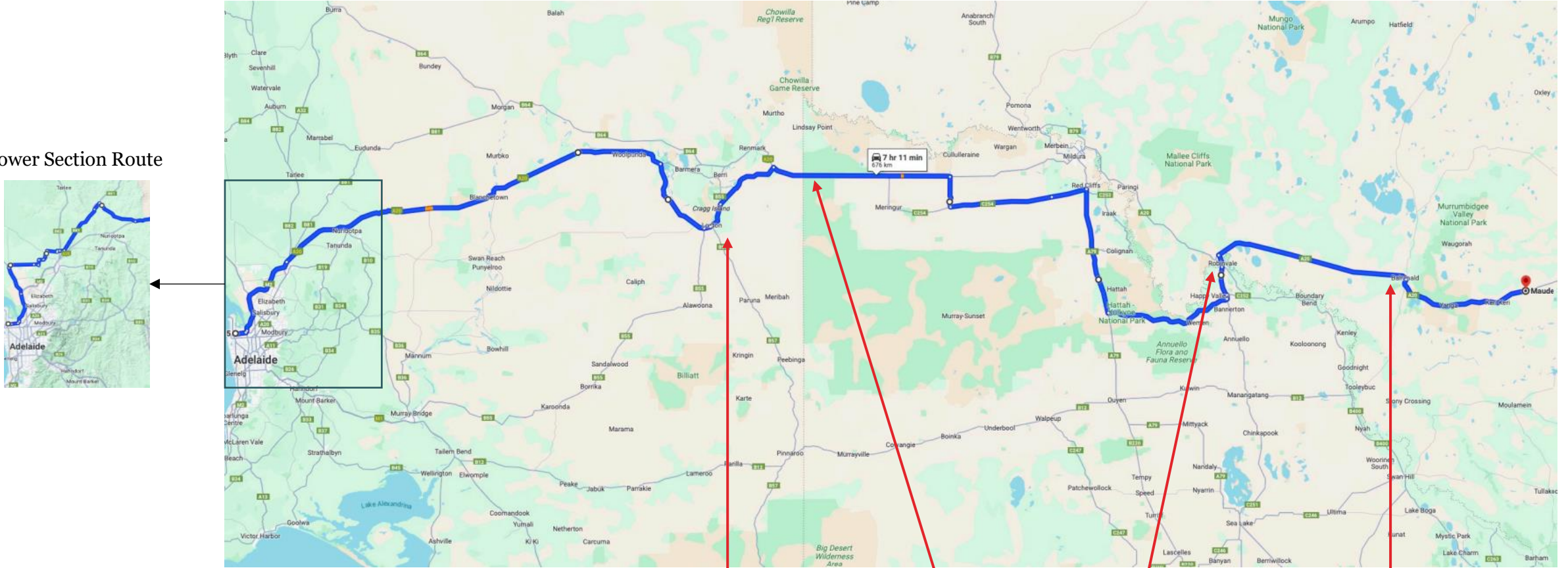
Amber BL-2A

Site Location: Sturt Highway / Market Street / McCabe Street, Balranald NSW

Assessed Blade Route ex Adelaide (Route 1)



Tower Section Route



Loxton/Pike River

SA-NSW

Robinvale
VIC-NSW

Balranald

BCS Submission and Response Strategy



- Met with DCCEEW BCS 4 December 2024
- Met with DCCEEW Water 17 January 2025 (waterfront land development)
- Met with Cmth DCCEEW 16 January 2025 (Plains wanderer)

Key Issue	BCS Submission	Baldon WF Response
1	Requirement to quantitatively assess impact of flood events	Detailed flood study completed. Three turbines to be removed. Other areas can be managed through design and engineering
2	Bird/Bat surveys incomplete with only 12 months of surveys and questions about survey effort. No BBAMP framework included.	BDAR updated to cover the now completed 24 months of consecutive BBUS, including all seasons of bat utilisation. Draft BBAMP to be included in RtS
3	Lack of demonstration of Avoidance, including SAII such as Plains Wanderers	Further detail provided in updated BDAR, including further removal of some infrastructure in more sensitive areas (e.g. Access Roads removal near Plains Wanderer sightings; One WTG(169) removed close to Little Eagle nest; other minor changes).
4	Extent of impacts to SAII unclear due to assumed presence for some species.	Additional surveys completed since EIS to significantly reduce number of assumed presence species, e.g. <i>Convolvulus tedmoorei</i> , <i>Pilularia</i> & <i>Eleocharis spp</i> , Austral pilwort + gilgai survey. No need to do Koala surveys as agreed with BCS . Revised the PCT mapping as per recommendation
5	Update BDAR to include impacts associated with the OSOM haul route	Survey completed in areas along haul route where impacts proposed. BDAR updated.
6	The impact to MNES unclear and requires further info to complete the Bilateral Assessment	BDAR updated to make this clear.
7	Lack of detail in proposed mitigations, requires additional detail and binding terms.	BDAR updated to make this clear.
8	Other - Southern Myotis bat now added to BAM-C	Additional Anabat surveys proximate to farm dams undertaken for Southern Myotis. Included in updated BDAR.
9	Other – range of minor comments or clarifications	Addressed in updated BDAR

Project refinements



Proposed refinement	EIS Project description
<u>Removal</u> of turbines and relocation of a met mast to avoid flood areas - Remove WTG 12, 13, 88 - Relocate met mast approx. X m.	Up to 180 wind turbines, rated capacity of approximately 8MW <i>(The Project is likely to be developed in separate stages. This will depend on the available capacity in the surrounding electricity network. Staging is likely to include:</i> • Stage 1: 45 turbines • Stage 2: 135 turbines)
<u>Removal</u> of turbines, and removal or relocation of access tracks and electrical reticulation to avoid biodiversity impacts - See next slides	GIS Layout
Up to 12 x battery cabinets (3 x 40ft containers) at WTG hardstands (approximately 4.4 MW/ 8.9 MWh per turbine) totalling not more than 200 MW/ 400 MWh (i.e. no change to total BESS capacity)	The BESS capacity would be achieved by one of the following layout options: • A centralised BESS at one or more substation locations, or • Smaller BESS distributed at turbine hardstands, or • A combination of these two options, totalling up to 200 MW/ 400 MWh. The above BESS capacity would be achieved likely using multiples of Goldwind GoldBlock L700Pro model 365 kW/ 745 kWh battery cabinets. <i>(Under the distributed approach the BESSs would each have a capacity of approximately 1.1 MW/ 2.2 MWh per turbine. The distributed BESS would include <u>three</u> battery cabinets assumed at each turbine.)</i>
<u>Reduction</u> of proposed transport routes: - exclude Port of Newcastle from current application - reduce Port Adelaide route options from four to one. (No change to site access)	Main haulage route either from Port of Adelaide or Newcastle. The Port Adelaide route is the preferred route ... For the Port of Adelaide route four route options, responding to dimension and weight constraints, were assessed ...
WTG lighting: Obstacle lighting on a select number of wind turbines is proposed to be installed and operate if required for aviation safety purposes as per the response to CASA's EIS submission.	<i>(Aviation obstacle lighting is not proposed on any of the turbines or meteorological masts.) However, was incidentally included in the Visual Impact Assessment.</i>

Project Refinements: Deleting WTGs 12, 13 and 88

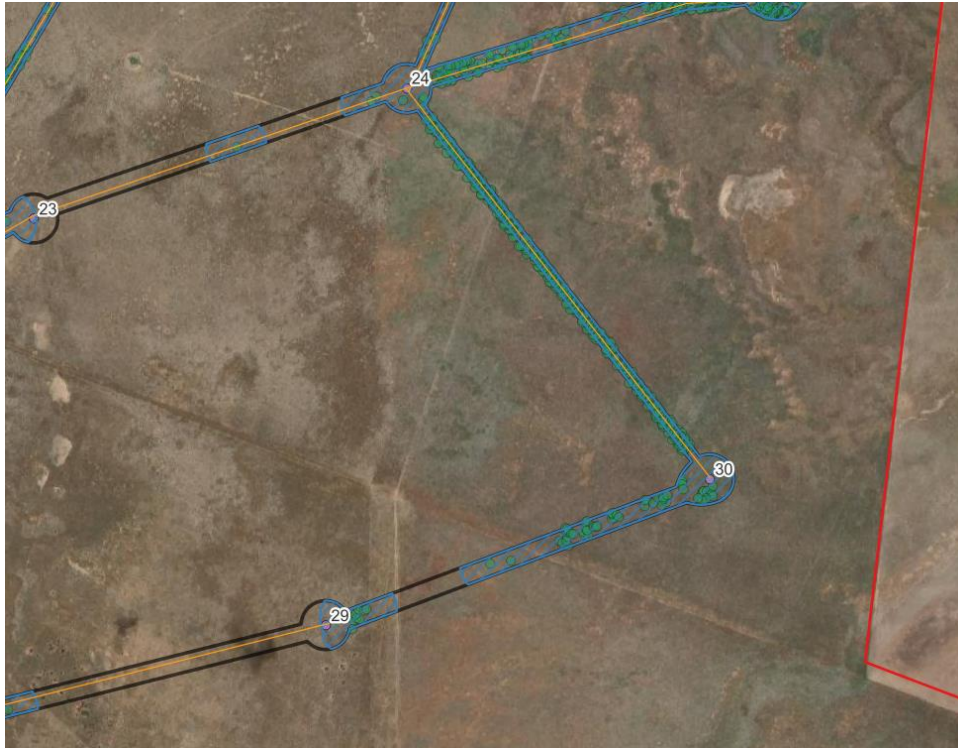


Remove WTG 12 & 13 and associated roads & reticulation. Due to flood study results

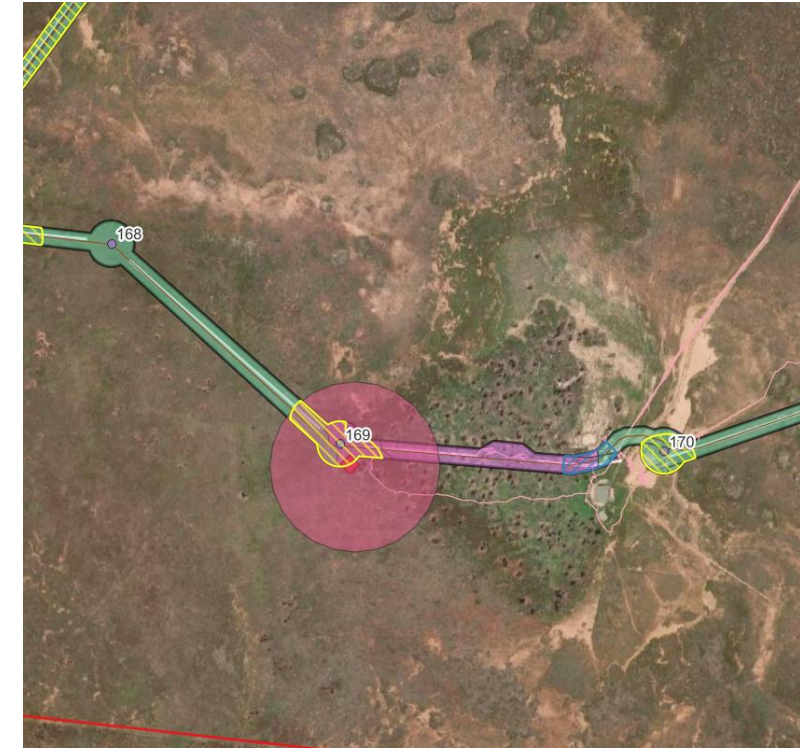


Remove WTG 88 and associated roads & reticulation. Due to flood study results

Project Refinements: Deleting WTG 169 and re-routing access tracks and reticulation



Remove electrical reticulation and footprint between 24 and 30.
Run reticulation from 29 to 30. Avoids impacts to Brachyscome



Remove turbine 169, and remove track and reticulation between 168 and 170. Run reticulation from 171 to 170. Avoids Little Eagle nest.

Additional assessments



Assessments due mid-March, Submissions Report likely lodged mid-late March

- Updated Biodiversity Development Assessment Report (BDAR), including additional survey work
- Updated Aboriginal Cultural Heritage Assessment Report (ACHAR)
- Potential environmental (biodiversity and cultural heritage) impacts of OSOM transport route road upgrades.
- Quantitative Flood Assessment.
- Updated Traffic Impact Assessment
- Updated Over-Size Over-Mass (OSOM) Route Study
- Aviation Lighting Plan

Questions?



Mark Terei

From: Jacqui Mott
Sent: Tuesday, 11 March 2025 10:46 AM
To: Vineeta Lal
Cc: Mark Terei; Renae Gifford
Subject: Baldon Wind Farm - potable water supply

Hi Vineeta -

Our email to HSC and its response as per below.

Jacqui Mott

Stakeholder Engagement Manager, Development Team
0407 775 450



GOLDWIND AUSTRALIA PTY LTD

ACN 140 108 390

Level 4, North Tower, 485 La Trobe Street, Melbourne, Victoria

From: David Webb <DWebb@hay.nsw.gov.au>
Sent: Friday, 7 March 2025 12:49 PM
To: Jacqui Mott <jacquimott@goldwindaustralia.com>; Greg Stewart <GStewart@hay.nsw.gov.au>
Cc: Jack Terblanche <JTerblanche@hay.nsw.gov.au>; Alison McLean <AMcLean@hay.nsw.gov.au>
Subject: RE: Baldon Wind Farm - potable water supply

Hi Jacqui,

Thank you for your email.

Your requirement equates to approx. 7.3ML per year at peak workforce, in which we could accommodate the supply to you. Council only supplies the water; you would be required to arrange the water tankers.

The use of approved/certified potable water carrier is required, and they can be filled from our water treatment plant on Cadell Street, Hay. Once closer we will need to work out a schedule and book times for the collection of water.

Applicable fees and charges will apply, which can be found in our Revenue Policy on our website <https://www.hay.nsw.gov.au/Inside-Hay-Shire-Council/Council-Plans-and-Reports> These are updated annually.

Trust this meets your project needs.

If you have any queries, please do not hesitate to contact me.

Thank you.



David Webb
General Manager

Hay Shire Council
134 Lachlan Street
Hay NSW 2711

Ph: 02 6990 1100 **Fax:** 02 6993 1288 **Mobile:** 0429 693 499

Values - Integrity • Openness • Responsiveness • Quality of Service

www.hay.nsw.gov.au www.visithay.com.au
Council Facebook Instagram Tourism Facebook

From: Jacqui Mott <jacquimott@goldwindaustralia.com>
Sent: Friday, 7 March 2025 10:17 AM
To: Greg Stewart <GStewart@hay.nsw.gov.au>
Cc: David Webb <DWebb@hay.nsw.gov.au>; Jack Terblanche <JTerblanche@hay.nsw.gov.au>
Subject: Baldon Wind Farm - potable water supply

Hello Greg,

Great to meet the team at Hay Shire Council recently.

I have a question for you/your team, with regards to our previous conversation about water supplies in the shire.

Through the 'response to submission' document, the Baldon Wind Farm project will need to strategise its supply of potable water for site amenities and drinking purposes during its construction period.

We envisage this could be a period of two years, with varying demands as the workforce numbers build up, and decrease due to works phases.
At its peak, an estimate would sit around 50L/person/day for 400 people (max) on site.

Does the Hay Shire Council have the capacity for this supply, and could it envisage providing the project a service for this potable water requirement?
At this early stage, we would anticipate collecting water from a fill-point using water tankers – rather than constructing any new pipe connection to site.

Thanks in advance for this information, as we are seeking an in-principal agreement at this stage.

Best regards,

Jacqui Mott
Stakeholder Engagement Manager, Development Team
0407 775 450



GOLDWIND AUSTRALIA PTY LTD

ACN 140 108 390

Level 4, North Tower, 485 La Trobe Street, Melbourne, Victoria

Goldwind Australia - Baldon Wind Farm project
Drop-In Information Sessions
Audience: General Public

Location: Balranald - Visitor Information Centre Precinct

Date: 14/11/24

1/ Engagement: General public and business owners

15 stakeholders engaged

Topics discussed/raised: Use of local roads; Community benefits; Use of local businesses for project supply chain; Local employment; Potential noise impacts; Decommissioning of wind farm equipment; Project timelines; Construction phase and employment potential for community; Project accommodation needs; Local hospitality businesses;

2/ Engagement: Balranald Shire Council representative

Topics discussed/raised: Water supply for camp accommodation; Potential of local benefits to shire; Opportunities for local supply chain; Use of local roads and council assets; Previous community funding due to floods; Infrastructure and housing needs of shire; Legacy initiatives for shire for long term vision of local government; workforce accommodation.

Location: Moulamein – Moulamein Art Gallery

Date: 14/11/24

Engagement: General public and local volunteers

8 stakeholders engaged

Topics discussed/raised: Visual impacts; Renewables in other Australian states; Moulamein community needs to improve lifestyle and amenities for residents; Volunteerism in community; Local organisations and services and legacy initiatives; lifecycle of project.

Location: Lachlan Street precinct, Hay.

Date: 15/11/24

Engagement: General public and business owners

16 stakeholders engaged

Topics discussed/raised: Local business community; Positive aspects of project for local benefits; Decommissioning (end-of-life) risks and mitigations; Time span for wind farm operations; Local accommodation needs of workforce; Not-for-profit organisations in shire; Legacy initiatives for shire community; Workforce employment opportunities; Challenges for local businesses and opportunities in local area for project supply needs; Project timelines; Local benefits and engagement opportunities at local schools for project; Community benefits welcomed in local shire; Local Aboriginal Land Council; Aboriginal participation in project including training and employment; Challenges of local Aboriginal communities regarding social aspects and support available to build capacity and social values in community; Cultural heritage; Cultural heritage consultation and sensitivities on 'Country'.

Mark Terei

From: Mark Terei
Sent: Tuesday, 18 February 2025 3:21 PM
To: mgraham@ruralcowater.com.au
Cc: Vineeta Lal; Medard Boutry; Kristina Yan; Jeff Bembrick; Renae Gifford
Subject: Temporary water entitlements

Good afternoon Mariane,

Thanks for the informative discussion around the water market for these two (three) water sources today: Lower Billabong Anabranh Water Source and Lower Murrumbidgee Groundwater Source (Deep and Shallow).

Appreciate your advice that:

- i. Temporary water allocations (in our case for approx. 2-3 years) are much easier to obtain than permanent water entitlements
- ii. Works approval (licence to pump) is required for any new bore and the process can be the main hurdle taking up to 6 months via WaterNSW
- iii. Zero share WAL is linked to the Works Approval
- iv. Buying from an existing bore owner would logically be the first port of call
- v. Buying water from the Deep gw source is likely easy, it typically being a liquid market
- vi. Buying water from the Shallow gw source is more constrained – appreciate it if you are able to shed any more light on this?
- vii. Buying water from the surface water source also rather constrained with just five licenses, but possible with consultation and a suitable price.

Accordingly, we would probably concentrate on gaining our project water requirements via iv or v above. Most bores (existing or proposed) would likely extend into the Deep source (beyond 40 m depth) in any case.

Kind regards,

Mark Terei
Senior Environmental Planner
CEnvP-IA (EIANZ)



GOLDWIND AUSTRALIA PTY LTD

ACN: 140 108 390

Level 25, Tower 1, International Towers Sydney, 100 Barangaroo Ave, Barangaroo NSW 2000

E: marktere@goldwindaustralia.com

M: +61 448 001 219

www.goldwind.com/en/australia/

My working hours may not be your working hours. Please do not feel obligated to respond to this e-mail outside of your normal working hours.

ACK ID 3034 RE: Baldon Wind Farm - EIS Response to Submission

From NSW SES Risk Reduction <rra@ses.nsw.gov.au>

Date Mon 7/4/25 11:24 AM

To Jacqui Mott <jacquimott@goldwindaustralia.com>

Cc NSW SES Risk Reduction <rra@ses.nsw.gov.au>; Joshua Stanbury <joshua.stanbury@ses.nsw.gov.au>

Good morning Jacqui,

Thank you for the above referral which has been registered as ID 3034. Please quote this ID on any related future correspondence.

Thank you for reaching out to the NSW SES to seek feedback on the draft flooding assessment study for the Baldon Wind Farm project site. Your email was forwarded to us, the Emergency Risk Assessment team, from our Zone Planning Team to assist with this request.

The referral will be assessed by our team and if deemed applicable, a response will be forthcoming in due course. If you would kindly be able to send through the draft flood study via email to rra@ses.nsw.gov.au, that would be very helpful.

In relation to the meeting request, please be advised that the NSW SES provide agency advice to the consent authority, and therefore any meetings will need to be coordinated by them directly.

Any meetings established by the consent authority must also include a clear agenda, and must include meeting minutes which are to be reviewed by all attendees prior to finalisation.

Thank you for your understanding and looking forward to hearing from you.

Kindly note the above email address for all future referrals.

Kind regards.

Daniela



Daniela Mitreski

**Program Support Officer | Emergency Risk Assessment Branch |
Emergency Management Directorate**

NSW State Emergency Service – State Headquarters

E rra@ses.nsw.gov.au

93-99 Burelli Street Wollongong, NSW 2500

PO Box 6126 Wollongong, NSW 2500

www.ses.nsw.gov.au



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TOGETHER TO DELIVER EXCELLENCE IN COMMUNITY PREPAREDNESS AND
EMERGENCY RESPONSE.**

The NSW SES acknowledges the traditional custodians of the lands on which we walk, work and live. We recognise their continuing connection to land, waters and culture and pay respect to Elders, past and present.

This message is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender. Views expressed in this message are those of the individual sender, and are not necessarily the views of the NSW State Emergency Service.

From: Jacqui Mott <jacquimott@goldwindaustralia.com>
Sent: Wednesday, 26 March 2025 4:06 PM
To: Southern Zone Admin <shz.admin@ses.nsw.gov.au>
Cc: Southern Zone Ops <shz.ops@ses.nsw.gov.au>
Subject: Baldon Wind Farm - EIS Response to Submission

EXTERNAL EMAIL: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Attention: Rod Winner

Thanks Rod, for taking my call today.

As explained to Deputy Zone Commander at NSW SES, Shane Hargraves, our company is proposing a wind farm development north of Moulamein, NSW – which is in the NSW SES Southern Zone.

We are currently in the project's planning stages and after submitting the project's Environmental Impact Statement, we are working on a 'response to submission' report to be submitted back to DPHI. One part of this submission response pertains to the project's draft flood study, which requires our project team at Goldwind Australia to directly engage with the NSW SES, to gain feedback and comments as an early planning phase discussion about the emergency management and mitigations regarding flooding on the project site.

This consultation can be achieved through a Teams meeting – with the goal of NSW SES building an understanding of the project and its flood mitigations through our draft flood study, and providing any comments or recommendations.

Thanks for your time on this, and I look forward to your response,

Jacqui Mott
Stakeholder Engagement Manager, Development Team
0407 775 450



GOLDWIND AUSTRALIA PTY LTD

ACN 140 108 390

Level 4, North Tower, 485 La Trobe Street, Melbourne, Victoria

APPENDIX E – UPDATED BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT (BDAR)

APPENDIX E.2 – BIODIVERSITY OFFSET STRATEGY (BOS)

APPENDIX F.1 – UPDATED ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT (ACHAR)

APPENDIX F.2 – ADDENDUM ACHAR (FOR OFF-SITE ROAD MODIFICATIONS)

APPENDIX G – FLOOD ASSESSMENT

APPENDIX H – UPDATED OSOM ROUTE STUDY

APPENDIX I – UPDATED TRAFFIC IMPACT ASSESSMENT

APPENDIX J – WATERFRONT LAND MEMO (DCCEEW WATER RESPONSE)

MEMO

Baldon Wind Farm Response to Submissions on Environmental Impact Statement - Waterfront Land

Project Title: Baldon Wind Farm (SSD-40138508)

Project Number (NGH): 240747

Project File Name: Baldon WF RTS Waterfront Land DCCEEW Response Final

Revision	Date	Prepared by	Reviewed by	Approved by
Final V1.0	28/04//2025	Les Seddon	Brooke Marshall	Les Seddon

EIS exhibited for 28 days till 10 September 2024.

DCCEEW Water submission reference OUT24/14141 dated 16/09/2024.

DCCEEW Response

NSW DCCEEW Water Group, Water Assessments, Knowledge Division, has reviewed the Environmental Impact Statement and has recommendations regarding water supply, take, licensing, High Priority GDEs, Guidelines for Controlled Activities and groundwater impacts.

1.3 Recommendation – pre-determination

The proponent should review and amend project's infrastructure to provide setbacks from waterfront land in accordance with the Guidelines for Controlled Activities.

Explanation

There are multiple minor and major watercourses, a wetland (Gunnyah Swamp), and a lake (Rawley's Lake) within the Project Area. The EIS states that the design and rehabilitation of works required within waterways will adhere to the Guidelines for Controlled Activities. This is supported, however, based on a review of the development corridors as shown in Figure 6-29 of the Project's EIS, the Project is proposing to locate infrastructure within waterfront land, such as wind turbines within Guyah Swamp, Abercrombie Creek and other areas of waterfront land mapped within the project area. This is not supported as the infrastructure should be setback from waterfront land in accordance with buffer requirements provided in Guidelines for Controlled Activities.

Baldon Wind Farm Response

Consultation with DCCEE Water was undertaken on 17th January 2025. As demonstrated in that meeting, it is difficult to apply the standard definition of 'waterfront land' to the Baldon project site. Therefore setbacks in relation to the standard definition are not considered by the assessment team to be appropriate. The Environmental Impact Statement (EIS) included commitments to complete flood modelling to confirm low risk activities and that mitigation measures were highly feasible during detail design to meet performance objectives. The results from this further investigation confirms that the project poses a low risk to local flooding and local hydrology and the stability of waterways. Notwithstanding this, three turbines located in areas most likely to interact with floodwaters have been removed, whilst a met mast has also been relocated.

Whilst guidelines for setbacks may not be appropriate, the Project will adhere to the guidelines for relevant best practice for design and construction of infrastructure in areas of potential flood inundation.

Mapping and establishing setbacks from water waterfront land

The Project site is situated on floodplains between Murrumbidgee and Edward Rivers. The site is very flat, with limited low relief drainage lines and negligible evidence of bank incision. Key drainage patterns are subject to movement; mapped watercourses (public Strahler data sets etc) often differ from the current aerial imagery and on ground inundation.

The most significant feature of the project site is Abercrombie Creek, a 9th order ephemeral waterway which is predominantly dry, but with a slightly lower elevation to surrounding areas. The difference is negligible; the bed level drops around 1.5m over 14km. Its bed and banks are not defined and do not relate well to strahler order mapping. It is related to a broad floodplain. This results in floodwaters characterised by extensive, shallow and slow-moving water. Other natural depressions such as Gunyah Swamp and Rawley's Lake, are similarly minor topographic depressions which result in temporary inundations but are without distinguishable bed and banks.

These features do not relate well to the definition of waterfront land. Under the WM Act waterfront land means:

*The bed of any river/lake/wetland, together with any land lying between the bed of the river and a line drawn parallel to, and the prescribed distance inland of, **the highest bank** of the river/wetland/lake as the bed of a waterway and the land 40 metres from the mean high bank.*

For the minor changes in topography shown, the term 'bank' is not applicable.

Definitions of waterfront land for estuaries and coastal water are also not applicable in this case.

Section 4.41 of the EP&A Act - WM Act s89 (water use), s90 (water management work) or s91(2) (controlled activity) approvals are not required for approved SSD.

A more detailed analysis of flood behaviour has been completed to better understand and manage impacts resulting from the project, refer to 'Flood modelling results' below.



Figure 1. Local depressions with no definable bank or shore. These images show vehicles parked within the mapped centreline of the most significant 9th order watercourse of Abercrombie Creek demonstrating an absence of bed and bank features. Abercrombie Creek is ephemeral, predominately dry and due to its slightly lower elevation to surrounding areas becomes inundated during significant flood events. Due to the flat terrain its temporary inundation extent varies dramatically relating to weather events, however is generally shallow and slow moving. The Abercrombie Creek bed level drops only 1.5m over the 14km distance it intersects the Project site from east to west.

Flood modelling results

The Hydrology and Flooding Flood Assessment, carried out by BMT, is now included as an Appendix to this Submissions Report.

At a high level, the report confirmed that no detrimental effects on hydrology are expected from the project and that performance objectives, see below, are feasible for the project.

The key findings for existing flooding and hydrology were that:

- Baseline scenario results indicate that surface flows are of relatively low velocity, due to shallow grades in the catchment and presence of significant storage areas.
- In a probable maximum flood event, most of the site is inundated.
- Local overland flows traversing the site are observed to be of low velocity, generally less than 0.4m/s in probable maximum flood events as well as in more frequent events.
- Breakout flows from Murrumbidgee River in the extreme event do not affect water levels or increase flood risk within the site.
- Due to the very slow moving water in the catchment, it is observed that the site is comprised of Flood Storage and Flood Fringe categories only.

In consideration of the interaction of the project with local flood behaviour, key findings include:

- Most proposed infrastructure on the site (except for some development located at the centre of the site), is located outside of the 1% Annual Exceedance Probability (AEP) flood extent, with floodplain encroachment occurring in the 0.5% AEP and greater.
- All proposed above ground infrastructure has been designed, and assumed in modelling, to be 0.5m above the 1% AEP flood level.
- The site consists of flood storage and flood fringe categories due to slow-moving water, and the proposal is not expected to cause significant changes to flood function. Flood functions and their extents are considered generally compatible with the proposal.
- For all modelled events, negligible flood impacts are observed outside of the site. No significant changes to velocity are expected outside the site as a result of the proposed development. The impacts within the site are considered non-detrimental to the proposed WTGs and developments.
- Post development flood velocities on site are relatively low with significant scour issues considered unlikely. Hazards were mainly driven by flood depth.:
 - In events from 5% to 0.2% AEP, low hazards (Hazard Category H1 to H3) are observed in areas within the site affected by Abercrombie Creek and The Forest Creek flow paths, except for storage areas within the site which exhibit high hazards (up to H5).
 - In the PMF, small areas of high hazard (up to H5) are observed within the site along Abercrombie Creek and The Forest Creek, while storage areas reach hazard levels up to H6.
- With consideration of relatively low velocities in existing and developed scenarios, it is expected that there will be limited erosion in the riverbanks, destruction of riparian vegetation or reduction in the stability of riverbanks or watercourses.
- Emergency management measures may be required to mitigate risks associated with access or isolation during flood events.

Performance objectives

The flood assessment results confirm the original risk based approach within the EIS. The EIS found the activities were low risk with high confidence in feasible mitigation strategies to be incorporated into detailed design. Key risks identified during the EIS for the project related to the establishment and maintenance of access tracks and cabling routes that cross periodically inundated areas. Wind turbines were considered to be a low unmitigated risk (much less than 1% of site) and readily managed in design.

The Hydrology and Flooding Assessment has confirmed that the proposed Project is unlikely to result in significant changes to flood function, velocity or scouring risk.

Best practice guidelines, excluding setbacks, will continue to be applied to detailed design, rehabilitation and decommissioning of these activities to:

- Minimise potential for erosion
- Maintain hydraulic flow and local hydrology.

Changes to infrastructure layout

Since the EIS submission, the layout has been considered with relation to ongoing detailed investigations. In relation to high flood hazard areas The current design includes the removal of three turbines and relocation of one meteorological mast to avoid high flood hazard areas, including:

- Removal of turbines 12, 13 and 88 (and associated access tracks and electrical reticulation to them)
- Relocation of one met mast approximately 1.8km northwest from near turbine 13 to near turbine 6
- Removal of the southern access track to the Project switching station

- Relocation of electrical reticulation route between turbine 78 and turbine 99
- Relocation of electrical reticulation to turbine 95.

In summary:

- Delineation of waterfront land boundaries is considered by the project assessment team to be inappropriate for this project.
- Previous uncertainty has now been addressed with reference to a site specific flood model for this unique site, showing low risk of impacts on flood behaviour, scour or offsite hydrological impacts.
- Design and rehabilitation for the project will follow the Controlled Activity Guidelines (excluding setbacks) as best practice to ensure that hydrological regimes are maintained, water flow and water quality are preserved and disturbed areas are stabilised appropriately.
- Three turbines have been removed, and a met mast relocated, in response to flood modelling to avoid high flood hazard (inundation) areas.
- Section 4.41 of the EP&A Act - WM Act s89 (water use), s90 (water management work) or s91(2) (controlled activity) approvals are not required for approved SSD.

APPENDIX K – AVIATION OBSTACLE LIGHTING PLAN

APPENDIX L – WATER NSW GROUNDWATER BORE RECORDS

WaterNSW

Work Summary

GW010677

Licence: 50WA504027

Licence Status: CANCELLED

Authorised Purpose(s): STOCK
Intended Purpose(s): STOCK

Work Type: Bore

Work Status: Needs Reconditioning

Construct.Method: Cable Tool

Owner Type: Private

Commenced Date:
Completion Date: 01/03/1954

Final Depth: 86.00 m
Drilled Depth: 86.00 m

Contractor Name: (None)

Driller:

Assistant Driller:

Property: TCHELERY Tchelery Rd MOULAMEIN
2733 NSW
GWMA: 002
GW Zone:

Standing Water Level (m):
Salinity Description: Brackish
Yield (L/s):

Site Details

Site Chosen By:

County
Form A: WAKOOL
Licensed: WAKOOL

Parish
BALDON
BALDON

Cadastre
70
Whole Lot 70//756506

Region: 50 - Murray

CMA Map: 7728-S

River Basin: 410 - MURRUMBIDGEE RIVER
Area/District:

Grid Zone:

Scale:

Elevation: 0.00 m (A.H.D.)
Elevation Source: (Unknown)

Northing: 6129054.000
Easting: 243047.000

Latitude: 34°56'54.5"S
Longitude: 144°11'10.6"E

GS Map: -

MGA Zone: 55

Coordinate Source: GD.,ACC.MAP

Construction

Negative depths indicate Above Ground Level; C-Cemented; SL-Slot Length; A-Aperture; GS-Grain Size; Q-Quantity; PL-Placement of Gravel Pack; PC-Pressure Cemented; S-Sump; CE-Centralisers

Hole	Pipe	Component	Type	From (m)	To (m)	Outside Diameter (mm)	Inside Diameter (mm)	Interval	Details
1	1	Opening	Screen	-100.00	0.00			1	
1	1	Casing	Threaded Steel	-0.20	83.00	152			

Water Bearing Zones

From (m)	To (m)	Thickness (m)	WBZ Type	S.W.L. (m)	D.D.L. (m)	Yield (L/s)	Hole Depth (m)	Duration (hr)	Salinity (mg/L)
17.70	28.70	11.00	(Unknown)	12.20					
62.20	64.00	1.80	(Unknown)	18.30					
82.30	86.00	3.70	(Unknown)	9.10		0.76			

Drillers Log

From (m)	To (m)	Thickness (m)	Drillers Description	Geological Material	Comments
0.00	11.58	11.58	Clay	Clay	
11.58	13.11	1.53	Drift	Invalid Code	
13.11	17.68	4.57	Clay	Clay	
17.68	28.65	10.97	Drift	Invalid Code	
28.65	38.40	9.75	Clay	Clay	
38.40	41.45	3.05	Silt	Silt	
41.45	51.21	9.76	Clay	Clay	
51.21	57.30	6.09	Drift	Invalid Code	
57.30	60.35	3.05	Clay	Clay	
60.35	62.18	1.83	Drift	Invalid Code	
62.18	68.28	6.10	Clay	Clay	
68.28	69.80	1.52	Sand	Sand	
69.80	71.32	1.52	Clay	Clay	
71.32	72.85	1.53	Sandstone	Sandstone	
72.85	73.76	0.91	Drift	Invalid Code	
73.76	74.07	0.31	Sandstone Black	Sandstone	
74.07	74.68	0.61	Drift Black	Invalid Code	
74.68	82.30	7.62	Sandstone Black Drift Interlayere	Sandstone	
82.30	85.95	3.65	Clay Water Supply	Clay	

Remarks

03/11/1977: Changed from 71.32m to 85.95m on 08/12/58 R/C & DEEPENED { 12M CAS ADDED
03/11/1977: SCN REMOVED WHEN R/C DEC 1958

*** End of GW010677 ***

Warning To Clients: This raw data has been supplied to the WaterNSW by drillers, licensees and other sources. WaterNSW does not verify the accuracy of this data. The data is presented for use by you at your own risk. You should consider verifying this data before relying on it. Professional hydrogeological advice should be sought in interpreting and using this data.

WaterNSW

Work Summary

GW014222

Licence: 50BL009975

Licence Status: CONVERTED

Authorised Purpose(s): STOCK
Intended Purpose(s): STOCK

Work Type: Bore

Work Status:

Construct.Method: Cable Tool

Owner Type: Private

Commenced Date:
Completion Date: 01/04/1959

Final Depth: 44.20 m
Drilled Depth: 44.20 m

Contractor Name: (None)

Driller:

Assistant Driller:

Property: N/A NSW
GWMA: 002
GW Zone:

Standing Water Level (m):
Salinity Description: Good
Yield (L/s):

Site Details

Site Chosen By:

County
Form A: WARADGERY
Licensed: WAKOOL

Parish
invalid co
WINTER

Cadastre
28
Whole Lot

Region: 40 - Murrumbidgee

River Basin: 410 - MURRUMBIDGEE RIVER
Area/District:

CMA Map: 7728-S

Grid Zone:

Scale:

Elevation: 0.00 m (A.H.D.)
Elevation Source: (Unknown)

Northing: 6138489.000
Easting: 232181.000

Latitude: 34°51'38.5"S
Longitude: 144°04'13.6"E

GS Map: -

MGA Zone: 55

Coordinate Source: GD.,ACC.MAP

Construction

Negative depths indicate Above Ground Level; C-Cemented; SL-Slot Length; A-Aperture; GS-Grain Size; Q-Quantity; PL-Placement of Gravel Pack; PC-Pressure Cemented; S-Sump; CE-Centralisers

Hole	Pipe	Component	Type	From (m)	To (m)	Outside Diameter (mm)	Inside Diameter (mm)	Interval	Details
1	1	Casing	Threaded Steel	-0.30	44.20	152			Suspended in Clamps

Water Bearing Zones

From (m)	To (m)	Thickness (m)	WBZ Type	S.W.L. (m)	D.D.L. (m)	Yield (L/s)	Hole Depth (m)	Duration (hr)	Salinity (mg/L)
44.20	44.20	0.00	Unconsolidated	11.60		0.38			

Drillers Log

From (m)	To (m)	Thickness (m)	Drillers Description	Geological Material	Comments
0.00	11.58	11.58	Clay	Clay	
11.58	13.41	1.83	Drift Coarse	Invalid Code	
13.41	24.38	10.97	Clay	Clay	
24.38	41.76	17.38	Clay Muddy	Clay	
41.76	44.20	2.44	Clay	Clay	

*** End of GW014222 ***

Warning To Clients: This raw data has been supplied to the WaterNSW by drillers, licensees and other sources. WaterNSW does not verify the accuracy of this data. The data is presented for use by you at your own risk. You should consider verifying this data before relying on it. Professional hydrogeological advice should be sought in interpreting and using this data.

WaterNSW

Work Summary

GW036799

Licence:	Licence Status:
Authorised Purpose(s): Intended Purpose(s): MONITORING BORE	
Work Type: Bore - Nested (3)	
Work Status: Manual Observations,Monthly	
Construct.Method: Rotary Mud	
Owner Type: NSW Office of Water	
Commenced Date: Completion Date: 01/06/1989	Final Depth: Drilled Depth:
Contractor Name: (None)	
Driller:	
Assistant Driller:	
Property: GWMA: GW Zone:	Standing Water Level (m): Salinity Description: Yield (L/s):

Site Details

Site Chosen By:		
County Form A: WARADGERY Licensed:	Parish SINCLAIR	Cadastre 7003/1073846
Region: 40 - Murrumbidgee	CMA Map: 7728-N	
River Basin: 410 - MURRUMBIDGEE RIVER Area/District:	Grid Zone:	Scale:
Elevation: 75.36 m (A.H.D.) Elevation Source: Unknown	Northing: 6158574.000 Easting: 250559.000	Latitude: 34°41'04.0"S Longitude: 144°16'38.0"E
GS Map: -	MGA Zone: 55	Coordinate Source: Surveyed

Construction

Negative depths indicate Above Ground Level; C-Cemented; SL-Slot Length; A-Aperture; GS-Grain Size; Q-Quantity; PL-Placement of Gravel Pack; PC-Pressure Cemented; S-Sump; CE-Centralisers

Hole	Pipe	Component	Type	From (m)	To (m)	Outside Diameter (mm)	Inside Diameter (mm)	Interval	Details
1		Backfill	Backfill	77.00	80.00	200			
1		Casing	Casing Protector	-1.20	1.80	152			
1	1	Casing	P.V.C.	-1.00	77.00	100			
1	1	Opening	Slots	59.00	71.00	100		1	Mechanically Slotted, A: 1.50mm
2		Backfill	Backfill	237.00	240.00	200			
2		Casing	Casing Protector	-1.20	1.80	152			
2	2	Casing	P.V.C.	-1.00	95.00	100			
2	2	Casing	P.V.C.	95.00	237.00	80			
2	2	Opening	Slots	225.00	231.00	80		2	Mechanically Slotted, A: 1.50mm
3		Backfill	Backfill	340.00	361.00	200			
3		Casing	Casing Protector	-1.20	2.00	152			
3	3	Casing	P.V.C.	-1.00	107.00	100			
3	3	Casing	P.V.C.	107.00	340.00	80			
3	3	Opening	Slots	322.00	334.00	80		3	Mechanically Slotted, A: 1.50mm

Water Bearing Zones

From (m)	To (m)	Thickness (m)	WBZ Type	S.W.L. (m)	D.D.L. (m)	Yield (L/s)	Hole Depth (m)	Duration (hr)	Salinity (mg/L)
59.00	94.00	35.00	(Unknown)	10.70		3.00			
217.00	232.00	15.00	(Unknown)	5.80		3.00			
290.00	349.00	59.00	(Unknown)	4.20		5.00			

Drillers Log

From (m)	To (m)	Thickness (m)	Drillers Description	Geological Material	Comments
0.00	1.00	1.00	Clay Water Supply	Clay	
1.00	10.00	9.00	Clay Sandy Multicoloured	Clay	
10.00	11.00	1.00	Clay Multicoloured	Clay	
11.00	16.00	5.00	Sand Fine	Sand	
16.00	37.00	21.00	Clay Multicoloured	Clay	
37.00	45.00	8.00	Clay Grey Sandy	Clay	
45.00	51.00	6.00	Gravel Coarse	Gravel	
51.00	59.00	8.00	Gravel White Sandy	Gravel	
59.00	94.00	35.00	Sand White Fine	Sand	
94.00	105.00	11.00	Clay Sandy Carbonaceous	Clay	
105.00	133.00	28.00	Sand Grey Fine	Sand	
133.00	149.00	16.00	Clay Sandy Carbonaceous	Clay	
149.00	152.00	3.00	Sand White Fine	Sand	
152.00	159.00	7.00	Clay Carbonaceous	Clay	
159.00	162.00	3.00	Sand White Fine	Sand	
162.00	172.00	10.00	Clay Sandy Carbonaceous	Clay	
172.00	174.00	2.00	Clay Carbonaceous	Clay	
174.00	208.00	34.00	Sand White Fine	Sand	
208.00	217.00	9.00	Clay Carbonaceous	Clay	

217.00	232.00	15.00	Sand White Fine-coarse	Sand	
232.00	290.00	58.00	Clay Carbonaceous	Clay	
290.00	301.00	11.00	Gravel White Coarse	Gravel	
301.00	308.00	7.00	Gravel Fine-coarse	Gravel	
308.00	349.00	41.00	Gravel White Coarse	Gravel	
349.00	359.00	10.00	Sandstone	Sandstone	

Remarks

12/08/1991: HOLE 1 77M CAS NO 1-3 SCN NO 1.
12/08/1991: HOLE 2 237M CAS NO 5-8 SCN NO 3.
12/08/1991: HOLE 3 340M CAS NO 10-13 SCNNO 5.
15/10/2008: Nat Carling, 15-Oct-2008: Updated RL's, coordinates & cadastre (was entered as 'TSR 46203'), based in info provided in State Water Survey database, provided by Jim Salmon.
17/12/2009: Geologist log and Stratigraphic log entered.

*** End of GW036799 ***

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WaterNSW

Work Summary

GW504355

Licence: 50WA506382

Licence Status: CURRENT

Authorised Purpose(s): DOMESTIC,STOCK
Intended Purpose(s): STOCK, DOMESTIC

Work Type: Bore

Work Status: Supply Obtained

Construct.Method: Rotary Mud

Owner Type: Private

Commenced Date:

Completion Date: 19/02/2008

Final Depth: 181.00 m

Drilled Depth: 181.00 m

Contractor Name: Watson Drilling

Driller: Jonathan Jay (Jono) Branson

Assistant Driller: Lee EDMUNDS

Property: KINGLE MOULAMEIN 2733 NSW

GWMA: 016

GW Zone:

Standing Water Level (m): 3.700

Salinity Description:

Yield (L/s):

Site Details

Site Chosen By:

County
Form A: WAKOOL
Licensed: WAKOOL

Parish
MEIN
MEIN

Cadaastre
59//756555
Whole Lot 59//756555

Region: 50 - Murray

River Basin: 410 - MURRUMBIDGEE RIVER
Area/District:

CMA Map: 7628-S

Grid Zone:

Scale:

Elevation: 0.00 m (A.H.D.)
Elevation Source: Unknown

Northing: 6132624.000
Easting: 772480.000

Latitude: 34°54'44.2"S
Longitude: 143°58'56.6"E

GS Map: -

MGA Zone: 54

Coordinate Source: GIS - Geogra

Construction

Negative depths indicate Above Ground Level; C-Cemented; SL-Slot Length; A-Aperture; GS-Grain Size; Q-Quantity; PL-Placement of Gravel Pack; PC-Pressure Cemented; S-Sump; CE-Centralisers

Hole	Pipe	Component	Type	From (m)	To (m)	Outside Diameter (mm)	Inside Diameter (mm)	Interval	Details
1		Hole	Hole	0.00	173.00	125			Rotary Mud
1		Hole	Hole	173.00	181.00	125			Rotary Mud
1		Backfill	Drilled Cutting	173.00	181.00				
1	1	Casing	Pvc Class 12	0.00	166.00	125	109		Seated, Screwed and Glued, S: 172.00-173.00m
1	1	Opening	Screen - Wedge Wire	166.00	172.00	125		0	Stainless Steel 304, Other, A: 0.75mm
1	1	Casing	Pvc Class 12	172.00	173.00	125	109		Seated, Screwed

Water Bearing Zones

From (m)	To (m)	Thickness (m)	WBZ Type	S.W.L. (m)	D.D.L. (m)	Yield (L/s)	Hole Depth (m)	Duration (hr)	Salinity (mg/L)
166.00	172.00	6.00	Unknown	3.70					2100.00

Drillers Log

From (m)	To (m)	Thickness (m)	Drillers Description	Geological Material	Comments
0.00	1.00	1.00	Topsoil, sandy	Topsoil	
1.00	6.00	5.00	Clay, light brown	Clay	
6.00	8.00	2.00	Silty clay	Silty Clay	
8.00	19.00	11.00	Clay, brown	Clay	
19.00	24.00	5.00	Clay gritty, layered sand	Clay Loam	
24.00	34.00	10.00	Clay, brown red	Clay	
34.00	37.00	3.00	Clay, grey	Clay	
37.00	45.00	8.00	Sand, grey PML	Sand	
45.00	51.00	6.00	Clay, light brown grey	Clay	
51.00	53.00	2.00	Gritty clay	Granite	
53.00	55.00	2.00	Ironstone	Ironstone	
55.00	65.00	10.00	Clay, brown	Clay	
65.00	76.00	11.00	Silty clay	Silty Clay	
76.00	97.00	21.00	Sand lignious, very fine	Sand and clay bands	
97.00	162.00	65.00	Lignious silt with rock	Lignite	
162.00	172.00	10.00	Sand, grey medium GML	Sand	
172.00	175.00	3.00	Silty sand PML	Silty Sand	
175.00	181.00	6.00	Lignious silt	Lignite	

Remarks

19/02/2008: Form A Remarks:
Entered by Clare Hillier

*** End of GW504355 ***

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APPENDIX M – DISTANCES FROM DWELLINGS TO WIND TURBINES

The following presents a summary of all non-associated, associated and host dwellings within the 8,000 m Study Area for Baldon Wind Farm.

Dwelling	Dwelling Status:	Agreement Type:	Distance to nearest Turbine:	Nearest Turbine:	Number of turbines within Black Line (4,000 m):	Turbines within Black Line (4,000 m):	Number of turbines between Black and Blue Line (4,000 – 5,900 m):	Turbines Within Black and Blue Line 4,000 - 5,900 m:	Number of Turbines Within 5,900 – 8000 m:	Turbines Within 5,900 – 8000 m:
R14	Associated	All impacts	0.94 km	T56	17	T32, T33, T34, T35, T36, T38, T39, T47, T48, T45, T46, T54, T55, T56, T57, T61, T62	16	T26, T27, T28, T29, T30, T31, T37, T43, T44, T52, T53, T60, T71, T72, T73, T74	20	T14, T15, T16, T17, T18, T20, T21, T22, T23, T24, T25, T42, T51, T58, T59, T79, T79, T80, T81, T82
R21	Associated	All impacts	0.84 km	T115	10	T94, T104, T105, T115, T116, T117, T118, T131, T132, T133	10	T83, T93, T95, T106, T107, T119, T134, T148, T146, T147	2019	T65, T66, T75, T76, T84, T85, T86, T96, T97, T108, T109, T120, T121, T135, T136, T149, T156, T158, T168, T169
R06A, R06B, *R06C	Associated	All impacts	3.07 km	T4	4	T2, T3, T4, T5	87	T1, T6, T8, T9, T10, T11, T12, T17	1211	T7, T13, T14, T15, T16, T18, T19, T21, T22, T23, T24, T25
R15a	Non-associated	N/A	3.66 km	T57	1	T57	9	T47, T48, T47, T56, T55, T61, T73, T82	16	T34, T35, T36, T39, T45, T46, T53, T54, T60, T71, T72, T81, T90, T91, T92, T103
R15b	Non-associated	N/A	3.77 km	T57	1	T57	8	T47, T48, T56, T61, T62, T73, T74, T82	14	T34, T35, T36, T39, T45, T46, T54, T55, T71, T72, T81, T91, T92, T103

R13	Non-associated	N/A	5.11 km	T25	0	N/A	43	T13 , T19, T25, T30	109	T5, T6, T11, T12 , T18, T23, T24, T29, T35, T36
R24	Non-associated	N/A	5.17 km	T131	0	N/A	3	T131, T146, T168	109	T115, T116, T117, T132, T133, T147, T148, T158, T169 , T170
R04a *R04b	Non-associated	N/A	7.54 km	T1	0	N/A	0	N/A	4	T1, T2, T3, T4
R05a R05b *R05c	Non-associated	N/A	6.96 km	T1	0	N/A	0	N/A	4	T1, T2, T3, T4
R7	Non-associated	N/A	6.94 km	T6	0	N/A	0	N/A	21	T6, T13
R27	Non-associated	N/A	6.62 km	T174	0	N/A	0	N/A	54	T169 , T179, T171, T172, T174
*R20a R20b	Non-associated	N/A	6.40 km	T65	0	N/A	0	N/A	9	T63, ^65, T66, T83, T93, T94, T104, T115, T116
R12	Non-associated	N/A	7.01 km	T40	0	N/A	0	N/A	3	T40, T41, T42

*Identifies Representative Dwelling used for assessment of dwelling cluster