



SC210

8 August 2024

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Team Leader
Energy Assessments
Department of Planning & Environment
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Dear Ms Homsey

RE: Murrumbidgee Council Submission – Dinawan Wind Farm (Application No. SSD - 50725708)

Murrumbidgee Council wishes to submit the following comments and proposed conditions of consent in relation to the proposed Dinawan Wind Farm at Four Corners Road and McLennons Bore Road Jerilderie, within the Murrumbidgee Council and Edward River Council area, lodged by Dinawan Energy Hub Pty Ltd (Spark Renewables Pty, involving the development of up to 200 wind turbines and associated structures.

Summary

Council understands from the Dinawan Wind Farm Environmental Impact Statement – June 2024 (the EIS) and associated documents, prepared by EMM for Spark Renewables, that the Dinawan Wind Farm will comprise of up to 200 wind turbine generators, associated supporting infrastructure and workers accommodation camp built over an area of 39,061 ha across the Murrumbidgee Council and Edward River Council areas, potentially producing 1.2GW of electricity, with connections to the Dinawan substation on the Kidman Way via McLennons Bore Road, Cadell Road and private landholdings.

Council can confirm that:

1. It supports the development.
2. The reasons it supports the project is that it is committed to renewable energy and that Spark Renewables have committed to the funding of community, and neighbourhood benefits which will result in measurable, relevant and intergenerational community, neighbourhood and Indigenous benefits.



3. Council has not received or made any political donations within the past 2 years.
4. It acknowledges the Department's disclaimer and declaration.

Submission

1. Traditional Lands

Council advises that the constant referral throughout the EIS to the traditional lands upon which the proposed Dinawan Wind Farm as being on Wiradjuri land is incorrect.

Council refers you to the attached map originally drawn up in the 1940's that establishes the site of the proposed Dinawan Wind Farm is on the traditional lands of the Jeithi Tribe (Norman Tindale 1974).

Any discussions therefore must be conducted with representatives of the current Jeithi Tribe in the preparation and finalisation of the Aboriginal Participation Plan.

2. Voluntary Planning Agreement

Section 5.7 of the EIS discusses a Community Benefit Sharing and Voluntary Planning Agreement.

Council is committed to agreeing to a VPA with Spark Renewables and has had initial discussions with representatives from Spark to achieve intergenerational community projects.

Council is determined that the community projects identified and included, following community consultation, in Council's current Development Contribution Plan are achieved.

Recommended Condition of Consent

- i. That Spark Renewables enter into a Voluntary Planning Agreement with Murrumbidgee Council to achieve the intergenerational community projects listed in the Murrumbidgee Council Developer Contributions Plan prior to any Construction Certificate being issued.***

3. Bushfire

Section 6.10 of the EIS discusses the potential risks from bush fire and commits to the preparation of a Fire Management Plan that addresses a range of matters in conjunction with the NSW Rural Fire Service Guidelines.



Due to the associated potential risks to surrounding landholdings and fire-fighting personnel Council is committed to ensuring that fires within wind farms are able to be extinguished both safely and expeditiously whilst having a minimal effect on surrounding properties and the resources of existing community based local RFS brigades.

The EIS states that *the eastern area, within Murrumbidgee LGA, is not mapped as bushfire prone Land*. This is incorrect as the land is subject to a draft plan not yet adopted.

The draft plan indicates that the majority of the site is in fact bush fire prone land.

Therefore, in addition to the requirements listed by the NSW Rural Fire Service – Planning for Bush Fire Protection 2019, the Fire Management Plan (referred to in Table 6.32) must contain a Risk Report and Plan as set out by the NSW Planning Hazardous Industry Planning Advisory Paper No. 2 - Fire Safety Study Guidelines.

Recommended Condition of Consent

- a. *The Fire Management Plan is to be developed and submitted to Council and the RFS for approval prior to the issue of a Construction Certificate that addresses the following:***
 - i. *A summary of fire hazards and risks to and from the site, specific to its location, infrastructure, activities and occupancy. Fire Management Plan Structure and Content is to be based on sound hazard identification and risk management processes. This must include risks to firefighter safety during emergencies.***
 - ii. *Description of control measures to prevent and reduce the consequences of external fire impacting the facility, including Fire permits, ignition source controls, hot work permits, job hazard analyses, infrastructure, vehicle, equipment, road, fence, access maintenance, waste management, compliant dangerous goods storage and handling, vegetation/fuel reduction and management.***
 - iii. *Description of control measures to prevent and reduce the consequences of external fire impacting the facility, including Bushfire monitoring, bushfire preparedness, reduced personnel presence/ activities/travel on days of Severe and above Fire Danger Rating, creation and management of fire breaks at the site perimeter and around infrastructure, vegetation/fuel reduction and management, Emergency Plan.***
 - iv. *Details of equipment and resources to manage fire at the facility, addressing Performance standards for risk controls, specific activities to verify controls (servicing/maintenance, housekeeping inspections, external audits), review processes for risk control effectiveness***



- v. ***Procedures for review of the Fire Management Plan. Review triggers and schedule, organisational accountability for the Plan, allocated responsibilities (to persons or roles) for the ongoing review and development of the Plan.***
- b. An Emergency Management Plan is to be developed and submitted to Council and the RFS for approval prior to the issue of a Construction Certificate that includes:***
- i. ***A facility description, including infrastructure details, operations, number of personnel, and operating hours.***
 - ii. ***A site plan depicting infrastructure (substations, grid connection points, transmission lines, dangerous goods storages, buildings, bunds), site access points and internal roads; fire services (water tanks, pumps, booster systems) drainage and neighbouring properties.***
 - iii. ***An emergency response procedure for each credible emergency event and scenario, based on a comprehensive risk management process.***
 - iv. ***Up-to-date contact details for facility personnel, and any relevant off-site personnel that could provide technical support during an emergency.***
 - v. ***Evacuation procedures and where appropriate, shelter-in-place procedures for facilities at-risk of bushfire or grassfire, if it is too late to evacuate.***
 - vi. ***Details of emergency resources, including fire detection and suppression systems and equipment; gas detection; emergency eye-wash and shower facilities; spill containment systems and equipment; emergency warning systems; communication systems; personal protective equipment; and first aid.***
 - vii. ***A manifest of dangerous goods (if required under the Dangerous Goods (Storage and Handling) Regulations 2022).***

4. Traffic

Recommended Condition of Consent

- i. ***The Transport mitigation measures listed under Table 6.23 are to be included in the proposed Construction Traffic Management Plan and are to be undertaken and completed at the full cost of the developer.***
- ii. ***That the Construction Traffic Management Plan listed under Table 6.24 is to be submitted to Council for approval prior to any Construction certificate being approved and is to include provisions***



for the inspection, in conjunction with representatives of Murrumbidgee Council, of all roads proposed to be utilised by the developer during construction and operational phases, to determine the current conditions of these roads in order that these roads will either be kept in an acceptable condition during the construction period or returned to a satisfactory condition post construction.

- iii. Water from the existing dams located within the road reserves of Wilsons Road, McLennons Bore Road, Cadell Road or any other road within the Murrumbidgee Council area can not be used for road construction or maintenance purposes or for any other purpose.***

5. Accommodation Camp

The EIS states that a workers accommodation camp is to be constructed as part of the early stages of the project, however does not appear to reference the design, required approvals or any proposed management of this camp.

Recommended Condition of Consent

- i. The developer is to submit details of the proposed workers accommodation plan prior to the issue of any Construction Certificate, including but limited to, site layout and design, numbers and types of facilities and amenities, waste water management, potable water sources, general waste management, off street car parking, certification of buildings, fire protection services and evidence of approval under the Local Government Act 1993 and Environmental Planning & Assessment Act 1979.***

6. Waste

The management of waste from the development as discussed under Section 6.14 is to be undertaken in accordance with Council's existing Policy that prohibits any waste generated by a renewable energy development from being disposed of in any landfill or waste water treatment plant within the Murrumbidgee Council area.

Recommended Condition of Consent

- i. The use of any landfill, transfer station or waste water treatment plant within the Murrumbidgee Council area for the disposal of any waste generated during the construction and the operation of the proposed wind farm is prohibited.***



7. Cumulative Impacts

Section 6.15 of the EIS does not adequately address the impact of Health Care services other than rely upon a first aid station at the camp and transport to Griffith for further attention. It is entirely possible that the nearest hospital and doctor's surgery, both at Jerilderie, will be hugely affected by the three accommodation camps located within 30kms of Jerilderie.

Further, the cumulative impact of three major renewable energy developments (Yanco Delta, Spark Renewables and RES Argoon) plus the Dinawan accommodation camp and substation site has not been satisfactorily addressed in this EIS or the others despite anecdotal evidence that telecommunications and traffic are already severely affected.

Recommended Condition of Consent

- i. Further consideration and assessment of the cumulative impact of three major renewable energy developments (Yanco Delta, Spark Renewables and RES Argoon) plus the Dinawan accommodation camp and substation site will have on local health care facilities, telecommunications and traffic.*
- ii. The Social Impact Management Plan, Industry Participation Plan and the Aboriginal Participation Plan are to be submitted to Murrumbidgee Council for assessment and approval before any Construction Certificate can be issued.*

Yours faithfully



Garry Stoll
Director Planning & Infrastructure

