

General –

When using acronyms it is best practice to spell it out in the first instance, and the first time used in each chapter. It makes the document easier for the general public to read.

You should include an acronym table at the front of the document if you are going to use acronyms without description in the executive summary.

Check your work, there are often double ups of words e.g. Table E-1 last paragraph has Significant. Significant progress....

Grammar is terrible throughout the whole document.

Mapping is inadequate, quite small, should be full page and scalable.

In the Appendix I there is reference to appendices, however, this document contains no appendices, if referring to appendices in another document, then this should point to the appropriate document.

Show the community some respect and at the very least spell road names correctly, e.g. Caddell Road pg 60 of the TTIA final is actually Cadell Road...

Policy and guidelines

The magnitude of increased biodiversity impact (including a greater than sevenfold increase in impacts to Myall Woodland EEC and over 700 ha of additional clearing) is inconsistent with the legal test for modification under section 4.55(2) of the EP&A Act. The proposal represents a materially different development and should be subject to a new development application and full reassessment.

Issues SEARs including supplementary SEARS for the Modified Project

The Project has failed to adequately address the specific risks as listed below (Appendix A protected matters relevant to the Yanco Delta Wind Farm)

- Lack of detail on the decommissioning stage of the proposed action, including waste removal and management.
- Further detail (with supporting evidence) of proposed measures to avoid, mitigate and manage the impacts on listed threatened species and ecological communities, including the use of enforceable language ('will', 'must', etc.) and consideration of the S.M.A.R.T Principle.
- Assessment of the proposed action against the principles of Ecologically Sustainable Development (ESD)

The modification report did not identify assess and mitigate impacts in relation to potential contamination as specified below (Supplementary SEARs).

- Identify, assess and mitigate social and economic impacts (both positive and negative) of the proposed action, including in relation to potential contamination (e.g. PFAS, PFOS and microplastics), impacts on agricultural land (including fire risk), sediment and erosion, impact of workers accommodation camp on roads/traffic, and impacts on the local community

BDAR and BAM-C

The BDAR explicitly acknowledges that the approved project did not assess a realistic disturbance footprint. This is inconsistent with the BAM requirement to assess the full extent of likely impacts and raises serious concerns regarding the validity of both the approved and modified biodiversity assessments.

The application of partial loss does not demonstrate a robust, evidence-based prediction of future vegetation integrity as required under the BAM. The proposed ongoing disturbance regime is likely to result in progressive degradation rather than maintenance of biodiversity values.

The BDAR adopts an inconsistent approach whereby species are assumed present for credit calculations but simultaneously described as unlikely to occur. This undermines the precautionary basis of the assessment and reduces confidence in both impact and offset calculations.

The conclusion that impacts to Plains-wanderer habitat have been avoided is not supported by a robust habitat assessment. The dismissal of mapped habitat based on land use classification is inconsistent with BAM requirements and risks underestimating impacts to this critically endangered species.

The turbine strike risk assessment is not supported by quantitative modelling or population-level analysis and therefore does not meet the requirements for assessing prescribed impacts under the BAM.

The BDAR does not demonstrate that impacts have been avoided and minimised to the greatest extent practicable as required under Chapter 2 of the BAM. The substantial increase in biodiversity impacts indicates that avoidance has not been a primary determinant of project design

The vegetation integrity assessment may not provide a sufficiently representative or robust dataset to support the assigned condition classes across the disturbance footprint, introducing uncertainty into ecosystem credit calculations under Chapter 4 of the BAM

The BDAR adopts inconsistent logic in applying assumed presence while asserting low likelihood of occurrence. This approach is not aligned with the precautionary framework underpinning species assessment in Chapter 5 of the BAM.

The assessment of prescribed impacts associated with turbine strike does not provide sufficient quantitative or population-level analysis to meet the intent of Chapter 6 of the BAM.

NSW EPA

- There is no reference to the NSW EPA Waste classification
- No clear compliance pathway demonstrated
 - Protection of the Environment Operations Act 1997
- No clear compliance with
 - waste avoidance and resource recover act 2001 (NSW)
 - Battery stewardship schemes

Key concerns

The justification indicating that it is substantially the same development is weak, while it is still a wind energy generating project,

- its impacts are excessively much larger than the approved EIS, they have to be when you are moving from a 253 ha project to one over 1100 ha.
- There are significant increase in biodiversity impacts without a strong alternatives analysis
- Alternatives presented for the connecting transmission line were superficial at best.
- The traffic assessment underplays OSOM movements and safety risks.
- Cumulative impacts are under analysed.
- The BDAR appears superficial at best.

Background summary

Indicates that the Mod 2 was initiated due to constraints imposed by other transmission projects and existing transmission infrastructure.

Where in fact, personal comms between myself and the project lead at the time (insert comms date here) indicated that the changes were required because they had “inherited a non constructable project” Wednesday 14 May 2025.

This is also highlighted pg 23 of the “Engagement Outcomes Report”

“The increase in the project footprint is required for constructability and safe, efficient delivery of the Project.”

At no stage did they indicate that the reason for the modification was for any other reason.

To enable construction, they had to substantially increase the access roads, trenching for cables, areas for construction, inclusion of water treatment and concrete batching plants and connecting transmission line. This led to an excessive expansion of the disturbance footprint.

Engagement

The first inkling of engagement I was notified by concerned near neighbours that Origin was undertaking engagement activities in Coleambally and Jerilderie. As a near neighbour, I have never been approached or consulted by the Proponent, even after requesting information when I have attended the community session (run primarily by EnergyCo) I have been brushed off and not consulted with. I have initiated follow up phone calls on four separate occasions and have not received responses to my requests for information.

Recently I have reached out to a new comms and engagement person and have had less than satisfactory responses.

This is in contradiction to the statement

“Origin will maintain timely, accessible and appropriate communication of project information to enhance community understanding of project activities, outcomes and opportunities for involvement throughout all stages of the Modification Application and over the life of the Project” pg iii

Community engagement

- Not well advertised
- Not advertised with lead up time to organise availability
- Project engagement team refused to engage meaningfully with near neighbours who are within 4 km of transmission line
- Project refused to supply information on soil survey after repeated requests both in person, on the phone and online via email
- Refused to engage in discussions surrounding safety and security from building a small town of 845 people but have not shown engagement with local law enforcement to help manage this influx of people especially in regard to rural crime where there has already been a spike in theft and trespass associated with

the Dinawan substation build (while it is acknowledged that some of this has not been reported).

Consultation – the supplementary SEARS issued with the Modification 2 request indicates that

“The Department emphasises the importance of consultation during the preparation of the modification report and refers you to the Undertaking Engagement Guidelines for State Significant Projects. **The Department’s expectation is that Applicants genuinely consider stakeholder views in project design and in identification of appropriate mitigation and management measures.**”

From personal experience, it is my firm belief that the engagement to date has been disingenuous. There has been very little response from the Project team to near neighbours when very reasonable requests have been made.

Attachment A – Consultation *“Provide evidence of consultation with all relevant stakeholders, including detail of how any issues raised have been addressed by the modification”* – **this can not be fully completed by the Project as they have not at any stage addressed any issues raised by myself.**

Engagement Outcomes Report states that non associated receivers within 8km of the project have been identified. I can clearly confirm that we had been missed, and we attended the engagement session in 2025 to highlight our concerns.

The engagement activities include a “mail out” we did not receive any communication via email, mail or in person, ever.

Agricultural livestock movements LLS legislation regulation requires traffic to give way to livestock, not the other way around. The project should not be burdening the local community with more notifications than required.

This is found in the Local Land Services Act Regulation 2014 Part 5 Division 2(53)

“The driver of a mechanically powered vehicle must give way to stock and to all other animals and any vehicle accompanying stock in a stock zone”

This applies where a temporary stock zone is set up (with signage) or where a permanent stock zone exists”

Safety and security – Local character and community cohesion

Recommend that camera car counters are established on local roads near the Project that are not intended for use by any Project associated staff regardless of whether they are actively working or on flex. This will aid in safety and security of the immediate area within 10 km of the Project site.

Recommend that all vehicles, not just those associated with TWA have **In vehicle monitoring** installed and all number plates recorded for verification with camera counters.

Impacts on telecommunications-

Advocating for upgrades is not enough, actively working to install new towers will improve. The lack of availability of mobile telecommunications leaves local residents vulnerable when they need emergency services or need to communicate with anyone else.

Communications should not be impacted or restricted due to a major project being constructed.

Housing and accommodation

The engagement team did not understand this issue. What protocols will they have to prevent people from literally camping on nearby roads. This has been an issue on McLennons Bore Road for the Dinawan Substation construction.

Bird and bat impacts

Would the Project commit to using available technology to identify when large birds e.g. wedge tailed eagles are in the area and arrest the wind turbines while they are in flight/soaring around them?

Biodiversity offsets

We understand that the project will find a biodiversity stewardship site, but the weeping myall especially on McLennons Bore Road not only are a treasured biodiversity value, but also make up the character of the landscape. It is not acceptable to clear them, then commit to a small area away from the current location for Biodiversity stewardship and then retire the rest of the credits.

Traffic and transport

The Project has indicated that Origin will have a road maintenance crew on site during the construction period..... Maintenance would be completed along all nominated routes to ensure they are maintained....

Recommend camera car counters to reduce the use of non-nominated roads by Project Staff as these roads are not scheduled to be maintained by the Project.

Neighbours to the north of the proposed modified project indicated that they had not been engaged with.

This has not occurred/feedback is not appropriately addressed/ not kept well informed of the project and consultation opportunities.

Request for additional details regarding the proposed modification timeframes

No email, or letter drop occurred during November/December 2025

Biodiversity

The classification of extensive areas as “partial loss” is not adequately justified. The proposed ongoing vegetation management (including height restrictions and periodic trimming) is likely to result in long term degradation of vegetation integrity and habitat values. This BDAR does not provide sufficient empirical evidence or modelling to support the assumption that biodiversity values will be maintained over the operational life of the Project. Fundamentally, with a change in overstory canopy, understory composition has to change.

Assumed presence. The BDAR applies an “assumed presence” approach due to survey limitations, while simultaneously asserting that the likelihood of occurrence is low. This inconsistency undermines confidence in the impact assessment and the justification of credit obligations.

Avoid and minimise are not demonstrated.

The BDAR does not demonstrate that impacts have been avoided and minimised to the greatest extent practicable as required under the BAM. Despite claims of iterative design refinement, the substantial increase in impacts indicates that biodiversity constraints have not been a primary driver of project layout.

Plains wanderer

The conclusion that impacts to Plains-wanderer habitat have been entirely avoided relies on the assumption that mapped habitat within the disturbance footprint is non-native. This assumption is not sufficiently substantiated and may not align with BAM requirements for habitat assessment of this species, which can utilise modified grasslands.

The SAI assessment relies on absence of records despite acknowledged survey limitations and access constraints. This reduces confidence in the conclusion that serious and irreversible impacts are unlikely

Figure



This map shows the light purple as full disturbance and the dark purple as no disturbance, it is noted that there is full disturbance for the entire length of McLennons Bore Road that has not been addressed within the updated BDAR.

This in contradiction to Figure 3-11 Detail Map I presented in the EIS showing disturbance footprint.



There is **contradiction between the EIS and the updated BDAR**. The updated BDAR states that vegetation trimming along McLennons Bore Road will be undertaken to maintain a height of the trees to 9 m, whereas, the EIS indicates that the vegetation clearing will be maintained to ensure a 9 m gap between the canopy and the transmission lines.

In relation to overstrung Vegetation management in the transmission easement **“Tree trimming height is likely to be maintained at 9 m to allow for line sag.”**pg 116 updated BDAR Section 7.2.1.1 External Transmission Corridor, last sentence of first paragraph. For Cadell Road **“Tree trimming heights will be the same as McLennons Bore Road easement area (i.e. 9 m).”**

It is noted that the maintained tree height within the property of the wind farm is 4 m, this is inconsistent with the maintained tree height for the road corridors.

BDAR section 8.1.2

The first two sentences do not make sense and should have been reviewed before being published. If nothing else, the Modified Disturbance footprint should have been stated, then compared to the approved EIS footprint, then expanded upon.

“The Modified Disturbance Footprint represents a substantial expansion in area compared to the Approved Project Footprint, which covered approximately 238 hectares. Of this footprint around 1,176 hectares consists of native vegetation associated with portions of ten PCTs, five of which are associated with TECs.”

Class condition for the weeping Myall only reached a condition class of moderate – good, I would argue they are much better than that and can be supported with appropriate photographs.

Mitigation measures BDAR

Enforceable language has been used loosely throughout the mitigation measures.

BIO1 – does not say how to

- minimise impacts to fauna movements across the landscape (project Design)
- Minimise the impact of predation on displaced fauna
- Detailed design of the Project will avoid and minimise the loss of vegetation and habitat and movements of fauna across the landscape and to minimise the impact of predation on displaced fauna.

BIO1 does not include enforceable language to protect vulnerable and endangered entities.

“Further detail (with supporting evidence) of proposed measures to avoid, mitigate and manage the impacts on listed threatened species and ecological communities, including the use of enforceable language (‘will’, ‘must’, etc.) and consideration of the S.M.A.R.T Principle.”

BIO4 – this is the only time SMART principles are mentioned despite the SEARs Specifying that

“Further detail (with supporting evidence) of proposed measures to avoid, mitigate and manage the impacts on listed threatened species and ecological communities, including the use of enforceable language (‘will’, ‘must’, etc.) and consideration of the S.M.A.R.T Principle.”

Partial Loss management Zones

Partial impact zones management actions associated with clearing, construction and operation (Table 8-22 of the BDAR) Do not use enforceable language within the management actions. This is in contradiction with the SEARs Advice

“Further detail (with supporting evidence) of proposed measures to avoid, mitigate and manage the impacts on listed threatened species and ecological communities, including the use of enforceable language (‘will’, ‘must’, etc.) and consideration of the S.M.A.R.T Principle”

PZ11. Applies to Wilson Road and external transmission and is inconsistent with BDAR advice earlier in the document nominating a 9 m vegetation height zone.

PZ11. Vegetation height zones can be established (e.g. maintaining canopy at 4 m) to balance safety requirements with ecological function.

Targeted threatened flora surveys modification footprint, September 2021-2025

Inadequate survey effort – Particularly on McLennons Bore Road and Cadell Road.

Transects presented on Figures 2-1 (20), (21), (25), do not cover the entire Disturbance Footprint.

Transects Presented for Figure 2-3 (1), (2), (3), (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), (21), (22), (23), (24), (25), had incomplete recorded transects with figures 2-3 (6-12) being on the transmission route on McLennons Bore Road and Cadel Road where the transects are minuscule, inadequate cover and have been positioned outside of the nominated disturbance footprint and seems to have been in sites selected to have little overstory cover, which would explain the reduced classification they have been afforded. None of the targeted species' surveys have covered the extent of each "nominated" disturbance footprint in any of the transmission route surveys.

I disagree with the classification of Moderate to good grassy for the weeping myall East of Kulki Lane on McLennons Bore Road.

Photographic evidence to support the BDAR

The evidence recorded and presented in the BDAR is deficient.

There are zero photographs included in the Figures to support the findings of the BDAR in regard to condition scores of the species identified.

The only onsite photographs included in this BDAR are examples of a road, but Plate 3-1 and 3-2 indicate an example of maintained road batters on Wilson Road and McLennons bore Road intersection. These appear to be on Wilson Road.

No "plates" or photographs have been included to show the condition of the Weeping Myall on McLennons Bore Road or on Cadel Road.

There are only 3 other photographs included in the BDAR and they are of species recorded on Moonbira Lane

This is in contradiction of the compilation of a BDAR which requires evidence to be collected in support of the BDAR.

The BDAR does not demonstrate compliance with the avoid and minimise framework established in Chapter 2 of the BAM. There is no clear evidence that biodiversity constraints have driven project design or that impacts have been reduced to the greatest extent practicable prior to offsetting.



Figure 1 600 m from the intersection of Cadell Road and McLennons Bore Road looking West on McLennons Bore Road



Figure 2 2km south of McLennons Bore Road and Cadell Road intersection looking south along Cadell Road

Simple photographic evidence would have supported the BDAR and is best practice to support it in this manner.

The BDAR provides limited photographic evidence to support vegetation condition, habitat quality, and impact assessment conclusions. This reduces transparency and limits independent verification of key assumptions.

Visual Impact

It is acknowledged that the Project would have been assessed using the appropriate guidelines, unfortunately the wide open plains do not have the same visual weighting as the weight applied to a rainforest. Our landscape will change substantially for a minimum of 30 years.

Soil

The addendum Soils Tech report does not meet the standard expected for a SSD. It is being used to justify a significant increase in disturbance footprint (from 253 to over 1100 hectares) without commensurate increase in field data, risk quantification or impact certainty. The project acknowledges that only a desktop assessment has been undertaken with no detailed physical and chemical soil science data available.

The Report acknowledges that “actual presence, extent and severity... could be confirmed with field investigations.

Uncertainty must be reduced, not carried forward and should not be defer fundamental baseline understanding to management plans

Sections 5-7 of the soils and contamination report do not constitute an impact assessment. A true impact assessment is qualitative, supported by data, modelling or compliance with SEARs.

Impact Assessment

The soils and contamination report fails to assess nature and extent of impacts. The report is general in nature without any quantitative supporting evidence, or modelling. Impacts are generic and non-measurable.

The report admits uncertainty due to no soil data but does not classify impacts as uncertain or assess irreversibility.

E.g. Water re use as irrigation - salinity risk,

No modelling – high uncertainty

This is a direct SEARs breach.

The entire report is opinion based not evidence based. There is no actual technical data required to make a detailed assessment.

In the management measures, measures are listed, but there is no performance criteria, modelling or evidence of effectiveness in similar soils.

There is no rainfall erosivity analysis, no erodibility factor and no design standard.

Mitigation measures are almost entirely deferred to management plans, however, management plans are only as good as the scaffold of mitigation measures presented in a Modification Report or EIS.

TWA Effluent - requires soil assessment, this report has no soil hydraulic capacity testing, no nutrient loading modelling, no salinity/sodicity risk modelling. Use of Effluent

by irrigation requires site-specific soil capability assessment which has not been undertaken.

This has been undercooked in the EIS and in the Modification report. The EIS was deficient in report and had no scientific supporting evidence. When soil lab certificates had been requested, they were not provided. They should have been accompanying the original report. The Modification Report relies on the earlier Jacobs report and does not provide any evidence from the Geotechnical survey.

- Disturbance footprint is 1522 ha, an increase of approximately 1314 hectares compared to the approved EIS
- No laboratory certificates or adequate assessment of soil conditions have been undertaken beyond, trust me we have done the studies
- Desktop assessment is inadequate for such a large project
- No provision of lab certificates from the geotechnical assessment
- No provision of methodology from the geotechnical assessment

Baseline soil analysis should be undertaken to verify erosion potential and to support decommissioning and rehabilitation.

It is not acceptable to spread spoil from digging the turbine foundations over the surface of the surrounding landscape.

Key Concerns

- Management measures are generic and not tied to specific impact pathways or specific locations. Without baseline soil data measures such as those listed in bold below is impossible.

“Measures to minimise/manage erosion and sediment transport both within the Project and offsite (including work on erodible soil types), including the requirements for the preparation of an Erosion and Sediment Control Plan (ESCP) for construction”

- No base line data means that there is no residual impact quantification
- Cumulative impacts are not addressed
- No integration with wind farm impacts, regional hydrology and agricultural systems

Agricultural Land was given literally 2 sentences of consideration which I would be surprised meets the SEARs requirements.

“Identify, assess and mitigate social and economic impacts (both positive and negative) of the proposed action, including in relation to hydrology impacts (e.g. run-off, drainage

lines, bore water use and erosion), **impacts on agricultural land**, and impacts on the local community (e.g. traffic, upgrade of McLennons Bore Road, etc.).”

Water – Groundwater

SEARs –

- Assessment of the proposed action against the principles of Ecologically Sustainable Development (ESD).
- Identify, assess and mitigate social and economic impacts (both positive and negative) of the proposed action, including in relation to hydrology impacts (e.g. run-off, drainage lines, bore water use and erosion), impacts on agricultural land, and impacts on the local community (e.g. traffic, upgrade of McLennons Bore Road, etc.).

The EIS references Appendix J – Revised surface water quality and ground water technical report This report does not exist in the Modification and should be included as an appendix in this report if you are going to point to it. IT is not named this or existing in the EIS, Mod 1 or Mod 2. It appears as Appendix I in the modification 2 appendices, but the description for the appendix is different to that of the report.

Key surface water limitations were acknowledged which indicates that limited information was available and no ground truthing was undertaken.

Most of the site is mapped as very slow infiltration adding to the burden of recharging the water table.

Surface water – relied heavily on the Jacobs 2022 report, but did not show how the assessment relates to the Project then, or now,

The desktop assessment indicates now that the threatened species do not exist in these areas, aka not listed in the “project area”. Please remember, impacts do not abide by arbitrarily drawn lines on a map – they reach beyond the project boundary.

- The Aurecon report does not indicate the methodology was applied to determine this
- I ran a new search using the 2022 Jacobs report methodology (flawed at best) which only considered the project area boundary and 500m buffer (inadequate for understanding the PMST concerns for the area, should be a minimum of 10km), the threatened species including the Murray cod is included in this search is listed as “known” to occur and as Vulnerable, Trout cod and Murray perch are listed as “may” occur and listed as endangered. This is in contrast to the findings of whomever undertook the most recent protected matters search.

- Figure 4-15 is not accurate as there are a number of registered bores that have not been included in the mapping.
- Impacts to GDE have been rated as low to moderate, where reading it it would more likely be rated low to high depending on where the GDE is.
- Low to moderate rating would be reserved for the “southern portion of the project area”

The technical report indicates that water will be sourced from a combination of importing water and groundwater sources. It does not account for how much will be attributed to each source.

In addition, it says that water will be accessed through a zero share WAL through existing bores that are used for irrigation purposes, but it does not say that the water will be extracted in addition to water being extracted for irrigation purposes, or if it will be extracted instead of irrigation. There is a high probability that this will lead to over extraction and negative impacts to the water table if it is in addition to the licensed water take for irrigation, stock and domestic purposes.

If new bores are to be sunk, then again, is the water take in addition to that used for agricultural purposes on the site?

If new bores are to be sunk, will they be capped and decommissioned at the end of the construction period?

Section 6.1.4, 6.1.5 identify risks but do not actually undertake an assessment. They just point to management measures.

Ground water

Construction

Assumptions and limitations of the Water sourcing strategies include

- Is desktop only
- High level understanding of the water demand
- No consideration of cumulative projects in the area was made for off site water availability
- No consideration of existing bores with expired licenses
- Project water supply quality requirements not specified

Change in water demand has more than doubled between the approved EIS and Modification 2.

Assessment of groundwater impacts has been minimised and is inadequate.

It is noted that the Project acknowledges that “over extraction” of ground and surface water may occur, this is not an acceptable risk, groundwater is relied upon for stock and domestic as well as for irrigation purposes. Tighter controls must be considered as ground water takes a very long time to replenish and in successive drier than average years in combination with drought years and high temperatures, this precious resource can be depleted quickly and replenished very slowly (talking decades). This has not been considered in climate change impacts.

Table 6-1 of the Appendix I Surface and Groundwater assessment acknowledges that there will be draw down and impact on nearby receivers up to 1km, however, this does not take into account the impact of nearby projects and as this system is porous and moved between aquifers, it is expected that this has the potential to have significant local impacts to moderate regional impacts on the groundwater resources. This has been assessed as low by the project, but 2m can have a significant impact on landowners who rely on groundwater for stock and domestic. There is no evidence indicating that this will not have an impact on flow, quality and availability, particularly if this drop lowers the water table below the reach of the existing bore depths.

Section 6.2.4 Potential impacts to registered bores (pg 52 Appendix I)

“Potential impacts are considered to be limited to stock & domestic and water supply bores within the anticipated radius of influence of project production bores. Based on the spatial distribution of registered stock and domestic and water supply bores in the study area, the impact associated with groundwater take to registered bores is expected to be low.”

It can be argued that the most critical water access is for that supporting livestock and humans. Mitigation measures should take this into account to not impact on ground water levels or quality. Low impact is not no impact and could be extremely costly for non-associated receivers that would have to drill new bores to access the water source.

Table 6-2 Construction impact and qualitative risk assessment (Appendix I) has the potential risk impact as minor, possible, low risk. Monitoring long term change in ground water levels is not acceptable as it can only report on what has happened after it happens and can not recharge this critical water source.

The risk assessment of the potential impact to groundwater in terms of over extraction is insufficient. Management measures are inadequate.

The reason there are groundwater sharing rules is because the groundwater sources in this region are depleting and they are being managed to slow the take and minimise impact. This has not been acknowledged by the assessment in the Project.

Operational water take has been flagged as taking ground water

“Appropriate zero-share WAL water allocations and water transfers or a new groundwater and surface water WAL if required and found to be suitable”

Why would the Project be expecting to take groundwater during the operational phase of the Project?

Chapter 7 Operational impacts, does not identify what groundwater take would be required for. It is summarised in section 7.2 and it is not acceptable to be taking groundwater for energy production especially post construction phase.

Again, the risk assessment table is not appropriate as it does not identify the quantity of water take and purpose of water take during operational phase and has a high risk of impacting groundwater reliability and availability for non associated stock and domestic groundwater users.

Over-extraction of groundwater in the Lower Murrumbidgee system has demonstrable impacts on both aquifer condition and broader hydrological processes, particularly due to the hydraulic interaction between the shallow and deep alluvial systems. Sustained pumping from the Lower Murrumbidgee Deep Groundwater Source—primarily for irrigation—has led to measurable long-term drawdown, with declines of up to ~12 m recorded in high-use areas between Hay, Darlington Point and Coleambally, and a persistent downward trend since the late 1990s . This extraction pressure induces vertical leakage from the overlying Lower Murrumbidgee Shallow Groundwater Source, effectively transferring water downward and causing localised depletion in the shallow aquifer while also contributing to rising salinity in the deep system . Where connectivity exists, this process can alter natural gradients, reduce baseflow contributions to the Murrumbidgee River, and in extreme cases reverse river–aquifer interactions, shifting systems from gaining to losing conditions under prolonged pumping . Broader environmental consequences include stress on groundwater-dependent ecosystems and reduced long-term water security, as extraction that exceeds recharge effectively mines the resource and can lead to lasting or irreversible impacts .

Recharge dynamics in the Lower Murrumbidgee are highly variable and typically slow relative to extraction rates. The shallow aquifer receives episodic recharge from rainfall, river leakage, irrigation return flows and lateral inflows, but its unconfined to semi-confined nature means groundwater levels respond gradually and can take extended periods to equilibrate spatially. In contrast, the deep aquifer relies largely on delayed leakage from the shallow system, meaning its replenishment operates on longer timescales and is buffered from short-term climatic variability but vulnerable to sustained over-pumping . Recovery of groundwater levels therefore depends on prolonged periods where recharge exceeds extraction—typically during wetter climatic phases—and may take many years to decades, with evidence showing that even after

significant recharge events (e.g. 2010–11 floods), groundwater levels did not fully return to pre-Millennium Drought conditions. This lagged recovery highlights that while groundwater systems provide resilience during drought, they are slow to replenish, and over-extraction can create long-term deficits that persist well beyond the period of intensive use.

LUCRA

Underestimates and is in contradiction to water specialist studies. It has rated increase in water demand leading to pressure on local water stocks as Possible and minor when mitigated, however, the technical studies acknowledged that there could be water table drop which would lead to non associated farmers having to drop their bores to access water for stock and domestic purposes. This is costly especially if the lowered water table is of lower water quality, so assigning a minor classification is not appropriate.

Transmission line connection to Dinawan Substation

As stated in the Modification 2 section 3.3.8.1 “65 m tall lattice steel towers spaced at intervals of about 200 to 400 m dependent on topography”

There is very little change in the Topography, it is essentially flat.

The Modified project description does not nominate tower type or capacity, nor does it say it will be as presented in the EIS.

Clearing is excessive for both Siting the tower and accommodating the brake and winch areas. I have spoken to Transgrid and they said as much.

PEC Transmission line crossing point

I find it interesting that Macquarie Bank has allowed for this incursion onto their land considering it is part of a 2.5 to 3 billion dollar conglomerate which is being prepared for sale. What kind of political pressure was placed on this entity or is there some kind of corruption/bribery to enable this to occur.

Vegetation clearing

There is no source for the diagram presented as Figure 3-18 and it is in contrast to the diagrams presented by Transgrid and available in the public domain.

Road safety barriers

Has consultation with TfNSW already occurred? What has been their response?

Road safety

By installing the transmission towers along the roads which have traditionally not had these structures, it inherently increases risks along the roadside that were not

previously there with road safety barriers adding to the severity of any potential accidents.

Traffic and Transport

Section 3.4 Table 3.8 and 3.9

“Data collection for the TTIA comprised a 7-day midblock survey using ATC and peak-hour intersection counts to assess current traffic demands and patterns. Locations were selected in consultation with Origin based on potential construction routes. ATC counts were undertaken from 23 to 30 October 2025 (NSW school term), capturing traffic volumes, classifications, speeds, and peak hours across all lanes. Intersection counts were completed on 23 October 2025 during 6am to 9am and 4pm to 7pm, recording turning movements. Results are summarised in Tables 3-8 and Table 3.9, with locations shown in Figure 3-4.”

These tables **do not** summarise the results from the ATC counts.

Section 4.3.3

Traffic counts on the highway at different intersections, are you trying to say that the number of vehicles turned into McLennons Bore Road, or just past it on the highway? If just driving past, then this is influenced by the movement of traffic from local roads that connect with the Kidman Way on either side of McLennons Bore Road to the east of the Highway and is reflective of the distribution of residences in different Agricultural areas, the closer to Coleambally you move, the higher the density of the population in Irrigation farms. The closer you move towards Jerilderie, the more sparsely populated the landscape becomes.

Travelling stock route

The map provided Figure 4-11 Appendix H – literally says nothing, the legend says “high” Medium and low but does not reference what that actually means, high value? High use? It actually is a value of conservation value – The TSR on McLennons Bore Road is of high conservation value, but impacts to this have not been assessed.

Road safety (APPENDIX H – traffic and transport)

Experience from other Projects indicate that road safety diminishes when project traffic use the road system like their own private road network.

- Recommend a commitment to having all project related staff regardless of when they are using the local road network to keep to speed limits and genuinely slow to a stop at give way signs. Anecdotal evidence suggests that there have been

many near misses due to Project staff driving off McLennons Bore Road onto Cadell road.

- Recommend a commitment to the Project having nominated roads for use
 - No Project related traffic to use Cadel Road from the north of McLennons Bore Road
 - No Project related traffic (either during work hours or during flex time) to use any local roads that are not identified as required for Project movements, this would include Kulki Lane, Stud Park North Road, Gala Vale Road.
 - **Recommend use of camera car counters** to identify movement of traffic on and off nominated roads, and to monitor road use for nearby local roads and lanes. ** this will also assist with identifying potential rural crime / manage rural crime.
 - will identify road users and also assist with assigning responsibilities for local road maintenance and repair
 - Suggested locations
 - Northern end of Cadel Road
 - Stud Park North Road
 - Northern and southern end of Kulki Lane
 - Milthorpe Lane

There is significant increase in movements, OSOM movements usually include 2-way movements and the OSOM will not have its final destination as the Project site, so the actual number is 8776 OSOM movements leading to eventual dilapidation of the local road network. This is not including the number of movements for all other types of vehicles. – 143 2 way movements for light vehicles and 384 two way daily movements for heavy vehicles.

If the road network is able to “*operate within capacity due to low existing traffic volumes*” why is the safety precaution necessary on the nominated intersections to accommodate the increased vehicle movements

Hazards and Risks

Contamination

Contamination risks beyond Asbestos has not been assessed. This includes PFAS, PFOS (which may occur from the TWA) and microplastics. This was directly pointed to in the Supplementary SEARs.

Contamination has not been adequately addressed in the Modification 2 Report or any of its supporting documents.

Transmission Line issues

Key Concerns

Transmission line to Dinawan 330kV – McLennons Bore Road

The allowance for clearance for the transmission line is nonsensical and excessive which will lead to traffic impacts and higher impacts on native vegetation than required.

330kv only require an easement of 60m, surely the Project would nominate a steel tower that would minimise environmental impacts.

Additionally, the Project has included impacting on 50m x 130 m to accommodate winch and brake sites – surely there is a nominated area or else how has the biodiversity impacts been addressed?

If the winch and brake area can be minimised on Cadell Road, why can't that be applied to McLennons Bore Road?

1.2 What does a Transgrid easement look like?

Transmission line easement dimensions are defined in the Easement Deed when the transmission line route is selected. More generally, the easement widths vary with voltage and design of the infrastructure. Figure 1 depicts the various infrastructure we use in the electricity network, their typical heights and easement widths.

Contact NSW Land Registry Services for detailed survey plans to determine the easement width at the interested location, such as the property you own.

The contact details for NSW Land Registry Services are 02 8776 3575 or 1300 052 637 (for regional callers), or via their website: www.nswlrs.com.au

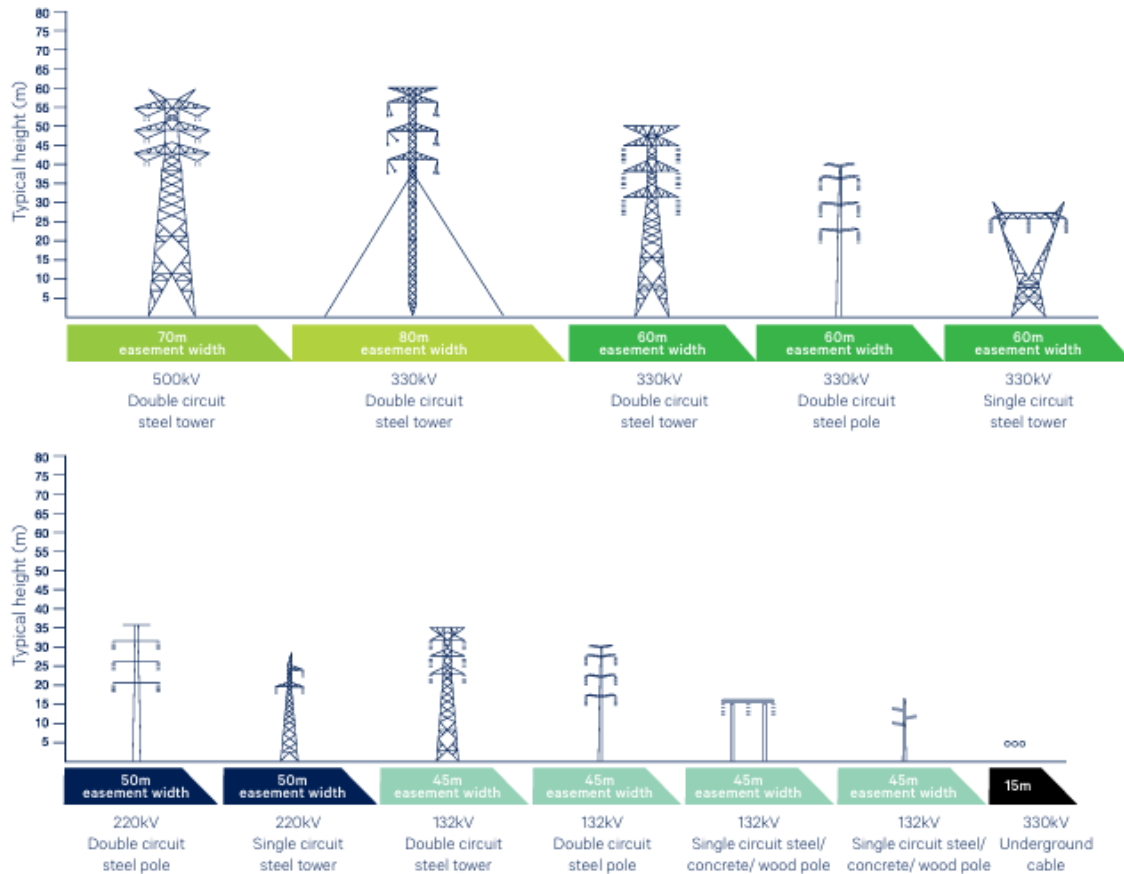
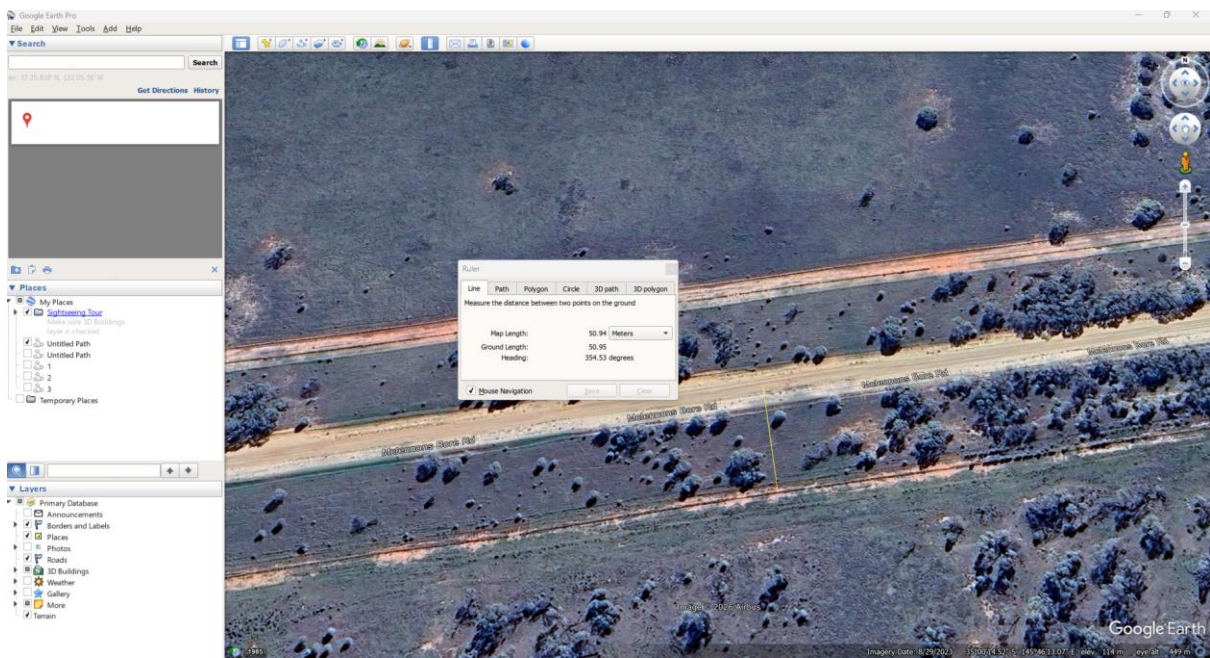
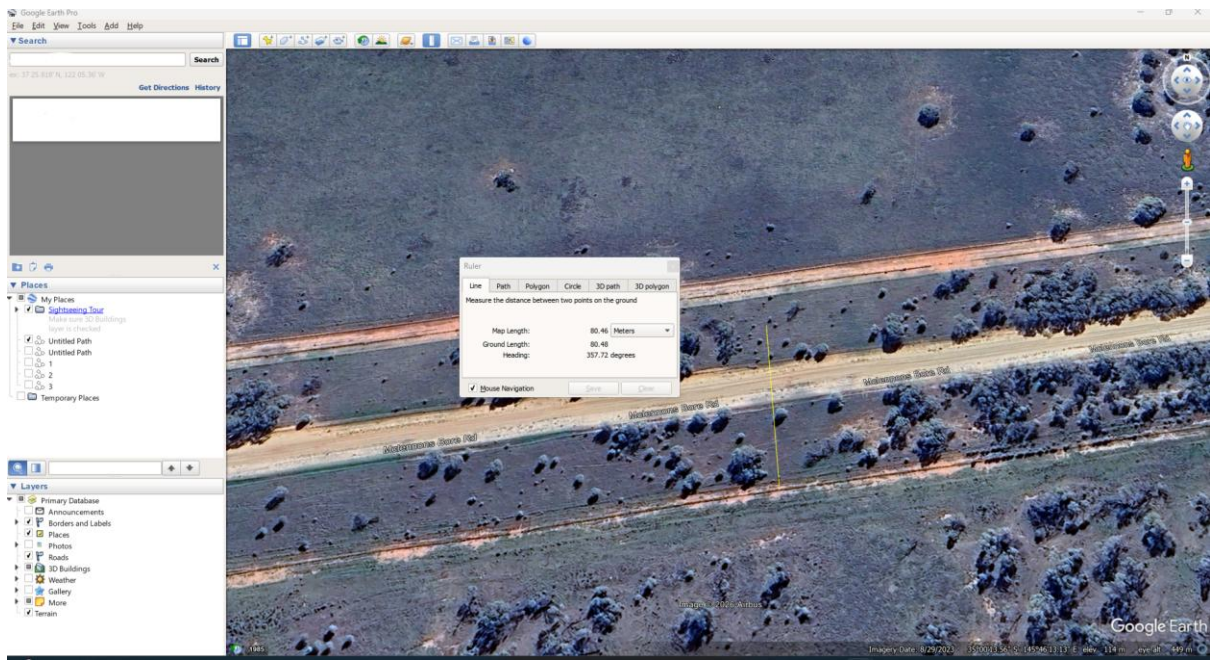


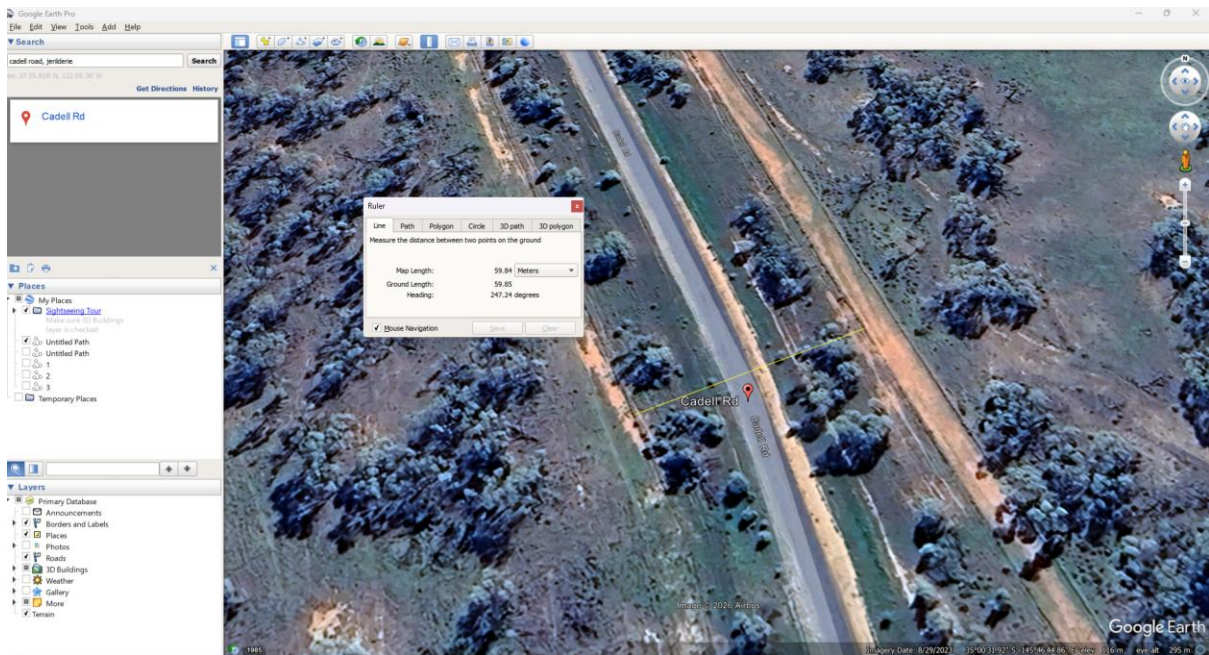
Figure 1: Figure not to scale. Typical easement widths only, may vary on a case-by-case basis. Typical height to be considered in the graph, actual size of tower can vary based on topography, location and conditions. It is best practice to engage a solicitor to check your land title for the exact location of an easement on your property.

Source transgrid.com.au - easement guidelines

- The 50 m x 80 m is excessive and would literally land in the middle of McLennons Bore Road. As shown in the image below.



- Cadell Road would not accommodate these transmission lines as the road corridor is at a maximum of 65 m. The maximum width from road edge to the boundary fence is 23 m



Social and economic

Waste and recycling

There is very limited information regarding waste in the Modification 2 report, this is in contradiction to requirements in the issued supplementary SEARs which identified waste removal and management.

There is no clear methodology, no reference to circular economy, waste and decommissioning are not sufficiently detailed to satisfy full lifecycle assessment.

EIS – Issued sears

Waste – identify, quantify and classify the likely waste streams to be generated during construction, operation and decommissioning, and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.

The waste section for such a large project in the EIS was deficient at best with literally one environmental management measure.

The Waste section of the Modified Project report was also deficient. There is no reference to any EPA or POEA legislation or regulation. The project acknowledges that there will be a significant increase in waste during construction, but there is no actual impact assessment undertaken. Rather, it just lists where the increased waste will come from.

PFAS, POS and micro plastics have not been addressed and this is an omission by the Project in response to **SEARs Direction**

There are ambiguous to no commitments in regard to decommissioning.

Foundations – have been nominated to be ~ 2.2 ha per turbine and 4 m deep which would have an approximate volume of 80,000 cubic meters, this means that over the site of 208 turbines conservatively there would be ~ 16,640,000 cubic meters of concrete to dispose of and 520 hectares of hardstand that otherwise would be grazing land. The volume of concrete may be less, however, a number for the actual size of each turbine concreted area has not been disclosed, only the hardstand area.

- Leaving the foundations in situ is in conflict with restoring agricultural land expectations and conflicts with recent NSW conditions.

Foundations	Reinforced concrete	General solid waste (non-putrescible)	■ Decommissioning	by turbine suppliers Foundations will remain in situ where it is determined to be more environmentally disruptive to remove the foundation
-------------	---------------------	---------------------------------------	-------------------	---

What is considered environmentally disruptive. What is the actual commitment here, it is not acceptable for **intergenerational equity** to leave 520 ha of 4 m deep concrete footings in situ.

WTGs	Resin, fibreglass, metals and electrical components	General solid waste (non-putrescible)	■ Decommissioning	Consistent with industry practice at the time of decommissioning. Alternate disposal methods for recycling and reuse are currently being investigated by turbine suppliers
------	---	---------------------------------------	-------------------	--

This is not an acceptable comment, the WTG should have been separated out, so that you can see that blades are going to be a problem unless you adopt technology that allows for recycling, metal and electrical components can currently be recycled at metal recycling facilities.

Sewage	Biological wastes from on-site septic systems, portable ablutions facilities pump-out	General solid waste (putrescible) Liquid waste	■ Construction ■ Operation ■ Decommissioning	Waste will be collected by a contractor and disposed off-site at a suitably licensed facility or managed through the proposed sewage treatment facility and effluent irrigation field (during operation of the TWA).
--------	---	---	--	--

Water treatment from TWA

- There has been limited discussion around the sewage treatment plant and no discussion around meeting EPA guidelines for treating waste water and application to land.

Green waste (spoil) how exactly do you expect to bag weeds? And why would you take the green waste off site when it could be used to compost or to create habitat for threatened species.

What do you consider non compostable food waste? Systems should be in place to separate and compost food waste.

Greenhouse gas (concrete batching)

The report has not specifically considered concrete batching which is proposed to be undertaken on site. Nor has it specifically considered the potential use of a water treatment plant which may be used for treating groundwater to bring it up to a standard suitable for use in concrete batching.

The modification report has indicated that there are no operational impacts, however, with an increase in track length and size, then there will be greater distances to drive across the site to reach all of the turbines for general maintenance, so there will have to be an increase in GHG emissions of some value.

Greenhouse gas (impacts from TWA including generator use, water treatment plant and irrigation (effluent applied to land)

These impacts have not been added to GHG considerations for the Project or as part of the Cumulative assessment when combined with other major projects

Resource use

Diesel Fuel use

Temporary Workers Accommodation

The TWA has a diesel storage are up to 20,000L for camp generators and refuelling light vehicles.

Plus the initial volume of diesel required for the camp generators

How will the Project

- Protect the local community from fuel shortages
- What is the estimated diesel use for the camp daily?
 - Camp generators
 - How many light vehicles are predicted to use this diesel source?
- What is the modelled pressure on local and regional fuel supplies on both cost and accessibility.

Main construction compound

The main construction compound has indicated that diesel fuel storage on site will be up to 260,000L for refuelling construction vehicles and equipment.

- What mitigation measures are proposed to minimise impact on fuel supply to local, regional and state supplies and pressure on at the pump prices?

Potable water

The temporary workers accommodation potable water estimate is 237 megalitres (pg 36 modification report). This does not define a time period for the water use.

Cumulative Impacts

The cumulative impact assessment is superficial at best, where it states “not expected to significantly alter cumulative impacts” it is fundamentally flawed as while it is recognised that it is in a REZ it fails to acknowledge that this actually comes with high cumulative pressure, and while multiple concurrent projects are acknowledged, there is not qualified cumulative modelling and no scenario testing. This does not fully meet the NSW cumulative impact guideline expectations.

Overlap of construction with Dinawan not considered in the Cumulative impact section. Proximity only has been considered. This Project has been referred to the IPC and will likely have a similar construction time line. This project both has impacts from proximity and construction timeline. This Project will also land XXX people at the Dinawan Substation workers units. In addition of the estimated 850 at the TWA and up to 90 more in local towns – totalling **895 FTE**.

The cumulative impact of this would be

- Safety and security
- Increase in traffic on local roads
- Pressure on health services.

No evidence has been shown that local emergency services have been engaged to increase personnel to meet the growing requirements of Allied health services, paramedics and appropriate police numbers.

It is noted that the Project has identified that paramedics may be accommodated on site, but it is unclear if these would be paramedics employed specifically by the Project, if they will be full time, how many would be on site at any given time.

Figure 4-63 is deficient as it only shows a point on the map for each project, actual project boundary representation would give a more accurate picture of the proposed projects.

Section 6.15.2.1 when using acronyms, e.g. BBAMP, spell it out in the first instance. Each section should be able to be read as a standalone chapter.

Section 6.15.2.3 Landscape character and visual impact, you have not included Dinawan Wind farm in this assessment, the two projects will definitely impact on the overall visual landscape. They are located literally next to each other, and our landscape will shift from open plains to a landscape with large protrusions over the landscape.

Section 6.15.2.5 Water and soils

- You have noted that over extraction of surface and ground water is a possibility.
 - It is a real and unacceptable possibility. All of the stations around the project, in fact all of the projects rely on groundwater as a water source for livestock. It is not reasonable to impact on the water quality or ground water table height/levels.
 - Will the Project provide free drilling and establishment of new stock and domestic bores when wells run dry to access suitable ground water to provide the homesteads and the livestock quality water?

Section 6.15.2.8 Social and economic.

While the Project is now including a Temporary workers accommodation (TWA) The influx of 8450 workers do have the potential to impact on social cohesion as they will go into town, likely Coleambally, Jerilderie and Conargo. This number of people will impact on Health services and there will be an increase in rural crime. Combined with a second TWA being at Dinawan Substation, this is likely to be up to 1400 extra people in relative close proximity to each other and the two closest towns.

How exactly have you determined that this will be a minimal impact?

Section 7

Section 7.1.1.2

While the impacts of the Projects are similar in nature to the EIS, the EIS was grossly inadequate, and the impacts are now significantly larger than that which was originally assessed.

Section 7.2.2

“As the Project approaches the end of its operational lifespan, it may be upgraded and maintained to continue operating viably, or the land within the Project would be rehabilitated to its pre-construction condition in consultation with landowners. Both options would provide benefits for future generations.”

How exactly would either option provide benefits for future generations?

This seems to suggest that the site rehabilitation would be left to the discretion of the landowner, What project commitments exist to ensure that all infrastructure including concrete pads for the wind turbines are removed and recycled at the operational end of the Project?

Section 7.2.3

This Project has significantly increased its direct impact on the biodiversity values of the local area. I am not sure that impact avoidance has been achieved, rather, just large sums of money have been or will be paid out to “offset” the permanent impacts this project will have.

Decommissioning.

Appendix A of the issued SEARs specifically regards the lack of detail on the decommissioning stage of the proposed action including waste removal and management. The Modified Project Failed to include more detail than the approved EIS.

Decommissioning of the Project has not been assessed as part of the Modified Project

Temporary Workers Accommodation

Decommissioning of the temporary workers accommodation is not clearly defined.

All works should be decommissioned at the cost of the Project and restored to a safe, non-polluting productive agricultural site. To achieve this, baseline agronomic soil surveys should be undertaken to guide the restoration of the site. The inclusion of the two words “where possible” leaves decommissioning ambiguous.

Appendix U Proposed CoA changes

A19. Origin proposes to amend the working to:**comply with the terms of the executed VPA.....**

In the interest of fairness and equity, should commit to adhering to the Benefit Sharing Guidelines as indicated in the EIS

B33. Access and Transport Route

The project has made the access and transport route conditions ambiguous in their proposed wording.

B44. Hazards

What are you trying to achieve or avoid by placing the words “or as agreed with the Planning secretary”?

C8. The clearing limits should be tabulated and included in the Appendix 4 of the CoC, not left in the BDAR.