

Submission to the Major Projects Assessment Team

NSW Department of Planning, Housing and Infrastructure

Yanco Delta Wind Farm – Modification 2

Submitted by: Bruce Rollinson on behalf of Silesian Downs Pty Ltd, RL & AH Rollinson Pty Ltd, and RB Rollinson Pty Ltd

Address: 1158 Goolgumbbla Road, Mabins Well NSW 2716

Date: 25 March 2026

1. Background

I am directly affected adjoining landholder, submitting on behalf of Silesian Downs Pty Ltd, RL & AH Rollinson Pty Ltd, and RB Rollinson Pty Ltd. I am not opposed to renewable energy development in principle. I am a host landholder for Spark Renewables' Dinawan solar and wind projects. My concerns are about the scale, statutory adequacy and local consequences of the Yanco Delta modifications.

This submission is made during the public exhibition of Modification 2 on the NSW Planning Portal. It asks the Department to subject the modification to rigorous assessment under the Environmental Planning and Assessment Act 1979 (EP&A Act) and to require the proponent to address the significant gaps identified below before any determination is made.

2. This is not a minor modification in substance

Under the EP&A Act, the characterisation of a modification determines the level of assessment it receives. The Department should satisfy itself that Modification 2 is being assessed at a level commensurate with its actual impacts, not simply on the basis of the label the proponent has applied to it.

The Modification 2 Report describes what is, in substance, a major expansion of the approved project:

- a more than five-fold increase in full-loss biodiversity impact (from 174.21 ha to 946.26 ha),
- a workers' accommodation camp for up to 420 personnel,
- an additional oversize / overmass transport route from Adelaide,
- major transmission changes including 6.8 km in the Cadell Road reserve, 700 m of road realignment and up to 62 ha of partial clearing, and
- a revised construction program of up to 208 turbines in a single stage.

Each of these changes individually would warrant careful assessment. Together, they represent a materially different project from what was originally approved. The Department should assess the substance of what is now proposed and must not allow the "modification" characterisation to limit the rigour of that assessment.

3. The modification report does not adequately assess road and traffic impacts

Section 4.15(1)(b) of the EP&A Act requires the consent authority to consider the likely impacts of the development, including environmental impacts on the natural and built environments. The Traffic and Transport Impact Assessment does not satisfy this requirement in relation to local road impacts.

The Traffic and Transport Impact Assessment projects 527 two-way daily movements in peak construction months, including 384 heavy vehicle movements, and approximately 4,388 one-way oversize / over mass movements over the construction period. These will fall heavily on low volume unsealed roads including McLennons Bore Road, Cadell Road, Liddles Lane, Wilson Road and Mabins Well Road, roads that farming businesses and residents depend on every day.

Three specific gaps require Council's attention:

- The workers' accommodation camp of up to 420 personnel generates sustained daily traffic that compounds heavy vehicle movements. This has not been assessed as part of the overall road impact.
- **Goolgumbla Road is not assessed at all, despite being a logical construction traffic route to turbines on the property 'Delta'.**
- Constructing 208 turbines in a single stage is operationally unrealistic. Unsealed roads in this region cannot withstand that volume of oversize and overmass movements, particularly in wet weather. The construction of Project EnergyConnect provides a recent and direct precedent: roads in this region sustained significant damage under similar construction pressures. Those lessons must be incorporated here.

Origin should be required to assess Goolgumbla Road, include workers' traffic in the overall impact assessment, and provide an independent engineering assessment of whether a 208-turbine single-stage program can be delivered without causing unacceptable road deterioration.

4. Cumulative road impacts are not being properly assessed

Section 4.15(1)(b) of the EP&A Act requires consideration of the likely impacts of the development, including cumulative impacts. The cumulative road impact assessment in the modification report does not satisfy this requirement.

This project will be constructed concurrently with the Dinawan Wind Farm, the Dinawan Solar Farm, and the VNI West transmission project. Each project will generate significant construction traffic on the same rural road network. It is difficult to see how Origin has concluded that the network will remain "within capacity".

The "within capacity" test is the wrong measure of cumulative impact on local roads.

he proponent has used a *network-level, volume-based* metric to discharge what should be a *road condition and amenity* assessment. Passing the capacity test tells you the network won't grid-lock. It tells you nothing about whether the road surface will survive, who pays for repairs, or whether a farmer can still do their job during and after the construction period.

What is required is a road-by-road assessment of the physical deterioration, maintenance burden and access impacts arising from the combined and overlapping construction traffic of all concurrent projects. The modification report does not provide this. Instead, it offers:

- pre-construction dilapidation surveys that record the starting condition but do not assess the compounding effect of sustained multi-project traffic loads,

- maintenance “if required” as the primary mitigation response, without specifying trigger conditions, response times or reinstatement standards, and
- no analysis of what happens to road condition and access during wet weather periods when damage is most acute and multiple projects are simultaneously active.

Origin’s own reports acknowledge that unsealed roads will be impacted, yet the primary response offered is pre-construction dilapidation surveys and “maintenance if required.” That is not a cumulative assessment. A dilapidation survey records the starting point; it does not measure the compounding effect of years of heavy traffic from multiple concurrent projects on roads with no capacity to absorb that sustained use.

The Department should require the proponent to provide a genuine road-by-road cumulative impact assessment covering all concurrent projects, with specific analysis of deterioration risk, maintenance obligations and access continuity for affected landholders. The burden of proof lies with the proponent, not with landholders asked to demonstrate harm after it has already occurred.

5. Road closures and emergency access

The modification report acknowledges that partial or full road closures may be required, that speed restrictions and detours may occur, and that details will be resolved through later approvals and construction planning. That approach does not satisfy the Department’s obligation under s4.15 to assess the likely impacts of the development before determining the application.

Basic questions about the impact of closures on affected landholders remain unanswered:

- how long closures will last and how often they may occur,
- whether multiple closures could occur simultaneously on connecting roads,
- how detours will work for farm vehicles and livestock, and
- what practical protections will exist for farming businesses throughout construction.

The project documents admit that closures may be required and that the details will be settled later. This is not acceptable. Many landholders in this region have only one or two roads in and out of their properties. A closure is not a minor inconvenience; it is a complete loss of access.

We insist on enforceable conditions: no simultaneous closures on key local roads, maximum closure durations with mandatory notice periods, guaranteed emergency vehicle passage at all times, and specific protocols for ambulance, fire, police and veterinary access.

6. Origin has rejected viable alternative routes without genuine consideration

I approached Origin directly about using the firebreak on my property on the northern side of McLennons Bore Road, west of the Project EnergyConnect line. I offered not only the easement, but free access for biological surveys. Origin rejected this outright.

In July 2025, in response to a request for an easement on our properties and letter of support for Origin to lodge its approval modification application, my solicitor (Tony Symons, Partner, Mills Oakley), explained our concerns with Origin’s proposed location of the easement and again suggested that the easement be situated along the existing fire-breaks to reduce the clearing of vegetation and impact on our properties and those of our neighbours. We subsequently granted Origin certain access rights over our properties under an Access Agreement to enable Origin to conduct survey and scout activities to determine if our suggested alternative is a viable transmission option. We have not been advised of the results of these survey and scout activities.

I also made a formal submission under the EPBC process supporting the use of the firebreak corridor on our properties, specifically because it would avoid clearing substantial areas of Weeping Myall woodland and Black Box – Lignum wetland. The firebreak route from the Yanco Delta Wind Farm project to the Dinawan substation would not only reduce impacts on native woodland and fauna, it would also deliver genuine cost savings to Origin by minimizing road relocations and reducing the need for taller, more densely spaced towers.

Origin subsequently rejected the alternative location on the basis of a native title claim affecting the Traveling Stock Reserve (TSR) north of Wilson Road, near the western end of McLennons Bore Road. The native title claim applies to the TSR, yet Origin's own proposed route is itself located on the TSR. If a native title claim on the TSR is genuinely an obstacle, it must apply equally to Origin's proposed route. The selective use of this argument to dismiss the firebreak alternative, while proceeding with a route through the same reserve, is not a credible position.



Fire break option along the McLennons Bore Road with PEC tower in the distance with road corridor vegetation right of screen. Photo taken 19/3/2026.

On other properties owned by RB Rollinson Pty Ltd and Silesian Downs Pty Ltd easement offers made by Origin were rejected on the grounds that they were well below commercial value, did not allow enough time for scrutiny, and most importantly did not include the entire easement along the fire break reserve so that they may use an already cleared easement.

Our properties stretch 17km along the McLennons Bore Road, 1 km along Wilson Road, and 6 km along the Cadell Rd, which is the entire length of the projected Origin power line. I understand that the Henwood family on the East side of Cadell Rd also supports the use of their fire breaks in preference to Origin's current proposal along the road. This would enable the entire length of the line to be negotiated with only two property owners.

Origin's claim that it has not been provided with "landholder consent" is factually incorrect and deeply misleading. My family has offered the firebreak routes described above to Origin as a practical, lower-impact, environmentally superior and cost-effective alternative. We have not withheld consent; rather we have proposed alternatives, which have been ignored.

We request Department to require Origin to provide a genuine and transparent comparative assessment of the firebreak route options, including a specific response to the native title argument that explains why that obstacle applies to the alternative but not to Origin's own chosen route on the same TSR. The modification report does not justify Origin's route selection, and approval should not proceed until it does. The environmental impacts of the chosen route were not inevitable, and the assessment should reflect that.

7. Biodiversity impacts require independent verification of offset calculations

The modification proposes a more than five-fold increase in full-loss biodiversity impact, from 174.21 hectares under the approved project to 946.26 hectares under the modified project. This is a fundamental change to the project's environmental footprint and cannot be adequately addressed simply by scaling up the biodiversity offset framework.

Under the Biodiversity Conservation Act 2016 and the requirements of the EP&A Act, the Department must satisfy itself that the biodiversity offset calculations are accurate and that the offset strategy will genuinely compensate for the impacts proposed. A more than five-fold increase in impact warrants independent scrutiny of the proponent's figures, not acceptance on the basis of the proponent's own assessment.

The report also contemplates road reserve works, road realignment and safety barrier installation along Cadell Road and McLennons Bore Road, with lasting consequences for roadside vegetation and habitat connectivity that are not adequately addressed in the biodiversity assessment.

The Department should require impose conditions that prioritise avoidance and minimisation of vegetation loss, including genuine consideration of alternative routes such as the fire breaks, rather than accepting credit offsets as a substitute for impact reduction.

7A. McLennons Bore Road: roadside vegetation and habitat loss

A recent ABC report (see [Attachment 1](#)) concerning roadside clearing for the Central West Orana REZ demonstrates exactly why the Department should treat proposed works within the McLennons Bore Road reserve with caution. That report describes the clearing of native roadside trees for renewable transmission infrastructure, followed by the rescue of numerous displaced native bird chicks. It also records claims that an alternative route existed which could have avoided that roadside habitat destruction.

The parallel with this project is obvious. Yanco Delta proposes transmission infrastructure within the McLennons Bore Road reserve for about 17 kilometres, requires construction areas around structure locations and temporary stringing areas, and acknowledges additional vegetation clearing associated

with the realigned transmission line. The project's own biodiversity material also confirms targeted survey work around McLennons Bore Road for hollow-nesting bird species and nest trees, which indicates that this is not an ecologically trivial roadside corridor.

The Department should therefore require proof that roadside vegetation and habitat loss along McLennons Bore Road has been avoided to the maximum extent possible, not merely reduced and then offset. The lesson from the Central West Orana REZ is that once mature roadside trees and nesting habitat are removed, the ecological damage is immediate and cannot be meaningfully reversed by offsets or wildlife rescue alone.

8. Long-term accountability

Origin has publicly indicated it does not intend to be the long-term owner. In December 2025, Origin CEO Frank Calabria said the company's intent was to take the project through development, secure the offtake contract, and then move most of that off balance sheet. If Origin exits after construction: who is responsible for road reinstatement? Who enforces biodiversity offset obligations across a change of ownership? What financial security protects the community if a successive owner does not meet those obligations?

Landowners and the community bear the consequences of a company that has dismissed better alternatives in order to accelerate its timeline. Origin is prepared to spend millions more to achieve an earlier start date and an earlier exit adding commercial value to a project it intends to sell, at the expense of the environment and the communities that will remain long after it has gone.

The Department should require that road reinstatement obligations, biodiversity offset commitments and construction damage liabilities are secured by bonds or financial guarantees tied to the land and the approval, not to Origin as the current proponent. Approval conditions must be structured to remain enforceable across any change of ownership.

9. Summary of requests to the Department

I ask the Major Projects Assessment Team to require the following before any determination of Modification 2:

1. Assess the modification on the basis of its actual impacts, not its label. Satisfy the Department that the level of assessment is commensurate with a more than five-fold increase in full-loss biodiversity impact and a substantially expanded construction program.
2. Require a specific traffic impact assessment for Goolgumbbla Road and include it within road condition monitoring and reinstatement obligations.
3. Require the proponent to assess the combined road impact of construction vehicles and workers' accommodation traffic on each affected local road.
4. Require an independent engineering assessment of road capacity under single-stage 208-turbine construction conditions, with specific analysis of wet weather risks and enforceable contingency protocols.
5. Require a genuine road-by-road cumulative impact assessment covering the combined construction traffic from Yanco Delta, Dinawan Wind Farm, Dinawan Solar Farm and VNI West.
6. Require a genuine comparative assessment of alternative easement and route options, including the firebreak alignment, with a specific explanation of why the native title argument that was used to dismiss this alternative does not equally apply to Origin's own proposed route on the same TSR.
7. Require independent verification of biodiversity offset calculations and prioritise avoidance over offsets.
8. Require financial guarantees for road reinstatement and biodiversity obligations tied to the land, not to Origin.
9. Oppose any approval process that defers key impacts to later management plans or future project owners.

10. Closing statement

I support the development of the South West REZ. I am a member of the Community Consultative Group with TransGrid for VNI West, and I have developed wonderful working relationships with TransGrid and Elecnor through the PEC construction. I raise these concerns not as someone opposed to this industry, but as a landholder and community representative who puts the environment, local communities and future generations first.

Modification 2 is plainly larger and more intensive than the project originally approved. My family has acted in good faith throughout, offering firebreak easements, providing access for surveys, and engaging formally through the EPBC process. That good faith has not been reciprocated by Origin.

The Environmental Planning and Assessment Act framework exists to ensure that communities are protected from exactly this kind of incremental expansion of impacts through modification. I ask the Department to apply that framework rigorously: to assess what is proposed, to impose conditions that are enforceable and financially secured, and to ensure that the people who bear the permanent consequences of this project are not left without recourse after the proponent has moved on.

I appreciate the work the Department of Planning, Housing and Infrastructure have done and recognize the difficulties that arise. I believe that you have the right to ask Origin questions regarding matters raised in this submission and I would appreciate the opportunity to defend any claims made against myself or my family.

We can learn a lot from what has happened in Central Orana and apply changes to assist alternatives to prevent environmental damage and public scrutiny.

I respectfully thank you for your time and consideration.

Yours sincerely,

Bruce Rollinson

On behalf of Silesian Downs Pty Ltd, RL & AH Rollinson Pty Ltd, and RB Rollinson Pty Ltd

Additional Information

NSW government, energy company under fire after native bird habitat cleared for renewables project

Xanthe Gregory. ABC. 1/12/2025

<https://www.abc.net.au/news/2025-12-01/nsw-government-renewable-land-clearing-birds/106085764>



Kookaburra chicks were saved after native vegetation was cleared near Gulgong. (Supplied: WIRES)

In short:

About 60 chicks have been left homeless after native trees were cut down to make way for a renewable energy project.

The vegetation was removed for transmission infrastructure as part of the NSW government's Central West Orana Renewable Energy Zone.

What's next?

Wildlife rescuers plan to reunite the birds with their parents if they can be tracked down.

A New South Wales government-backed renewable energy project has been accused of environmental vandalism after dozens of threatened birds were found in native trees it had cleared.

Newborn birds were saved after a corridor of native trees was cut down as part of the construction of the Central West Orana Renewable Energy Zone (REZ).

The \$5.5 billion Net Zero project spans from Cassilis to Narromine and north of Orange to Gilgandra.

Mudgee Vet Hospital said about 60 hatchlings, including kookaburras, kestrels, rosellas and galahs had been brought in by workers since late October.

"We were inundated without any warning and just horrified at the numbers," veterinarian Paige Loneregan said.

"It's very distressing for all our staff, we've never had this many baby birds ever."

One kookaburra chick had to be euthanised because it had a broken pelvis.



Trees were cleared along Merotherie Road, about 20 kilometres from Gulgong, in November. (Supplied: Andrew Gee)

Energy company ACEREZ cleared vegetation along the Merotherie Road, north of Mudgee, to upgrade the dirt road that led to the Merotherie Energy Hub.

It was awarded the contract for the REZ transmission project by state government body EnergyCo to connect solar and wind energy to the grid.

The company said in a statement that the clearing was "taking place on private property in accordance with the project's environmental impact statement, planning approval and biodiversity management plan".

The affected fledglings have since been handed over to the wildlife rescue organisation WIRES.

WIRES emergency response manager Matthew Godwin said local volunteers were so "overwhelmed" by the number of birds that his organisation brought in a wildlife ambulance from Sydney to spread them among carers across the region.



Eastern rosellas were found in the Merotherie Road vegetation corridor. (Supplied: WIRES)

"It's one of the more troubling instances that I've been a part of," Mr Godwin said.

He said the aim was to reunite the birds with their parents if they were still in the area.

In a statement, an ACERZ spokesperson said it is "liaising with WIRES and working with Taronga Wildlife Hospital at Dubbo ... to care for any birds displaced by the clearing required".

"Ecologists and fauna spotters are also onsite to ensure the birds can be safely relocated or taken to vets or wildlife carers," the spokesperson said.



David Allworth and Sue Stoddart stand on Merotherie Road before the tree removal (left) and the aftermath (right). (Supplied: David Allworth)

Mudgee-based ecologist David Allworth first came across Merotherie Road in 2019 through his cycling group the Central West Cycle Trail, which maps out quiet country roads.

"There were very ancient ... centuries-old trees," Mr Allworth said.

"It was Australian native trees, the eucalypts, lining those roads, a classic quiet country lane.

"It's those trees that are so critical for so much of Australia's fauna for providing hollows."

Mr Allworth said the cycling group had raised concerns about plans to remove the vegetation and wrote to the state government suggesting the road be built on adjacent EnergyCo-owned land which would not require clearing.



A galah chick stands on a towel after being rescued near Mudgee. (Supplied: WIRES)

"It's been an unnecessary tragedy,"

Mr Allworth said.

"It greatly puts into question some of the environmental credentials of the implementers and it puts into question the environmental credentials of the regulator.

"Here was a simple solution and you didn't take it.

"Renewable energy is meant to take us on a positive path and I'm afraid in this case it's failed quite miserably."



Google Maps shows the trees surrounding Merotherie Road prior to being cleared in October. (Supplied: WIRES)

Member for Calare Andrew Gee described it as an act of "environmental vandalism" to make way for what was supposed to be clean, green energy infrastructure.

"There is a bitter irony in it that this destruction is being made and taking place in the name of the environment," Mr Gee said.

"They could easily have put in another road parallel to Merotherie Road which would have bypassed that crucial wildlife corridor but they chose not to do that."

Mr Gee said he had written to the NSW premier requesting ACERZ halt all further tree removal in the area and come up with a plan to prevent further destruction of native habitat.

Critically endangered habitat

Plans to build twin transmission lines between Wollar and the proposed substations at Merotherie and Elong Elong were approved by the NSW Department of Planning, Housing and Infrastructure in June 2024.



The Central West Orana Renewable Energy Zone (REZ) spans 20,000 square kilometres. (ABC Rural: Emily Middleton)

Biodiversity assessments for the transmission infrastructure, lodged with the state's planning department in 2023, show the cleared area was identified as containing critically endangered hollow bearing trees, including white box, yellow box and Blakely's red gum.

The studies show it was potential habitat for threatened fauna species including the koala, glossy black cockatoo, little eagle, squirrel glider and eastern pygmy possum.

A little eagle nest was found during surveys, with two of the birds observed flying over the area in 2022.

The NSW Government's EnergyCo referred the ABC to ACEREZ and provided a media release about a \$140 million biodiversity offset program.

The release, from October 2025, reads "the Minns Labor Government is showing that renewable energy and nature conservation can go hand-in hand".

It details how it will invest in biodiversity offsets in the region and include creating wildlife corridors and habitat connectivity.



Kestrel fledglings are being cared for after hollow-bearing trees were removed. (Supplied: WIRES)

Mr Allworth said offsets should only be used as a "last resort when there is no alternative".

"There were alternatives for Merotherie Road," he said.

"You can't replace these mammoth old hollow bearing trees in our generation or even a couple of generations."

In a statement, Acting NSW Energy Minister Paul Scully said climate change was one of the biggest threats to endangered species.

"Building renewable energy projects and transmission infrastructure is about keeping the lights on, but it's also about driving down emissions to reduce the impacts of climate change," Mr Scully said.

"But the photos are upsetting — no one wants to see birds displaced."