URALLA SHIRE COUNCIL

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Director – Energy Assessments, Development Assessment
Department of Planning and Environment
Locked Bag 5022
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OBJECTION: Winterbourne Wind Farm SSD - 10471

Uralla Shire Council endorses sustainable development within the Shire, and expects the Development Application to be considered in the context of our Community Strategic Plan, particularly the following stated goals:

- To preserve, protect and renew our beautiful natural environment.
- Maintain a healthy balance between development and the environment.
- An attractive environment for business, tourism and industry.
- Growing and diversified employment, education and tourism opportunities.

At the Uralla Shire Council December 2022 Ordinary Meeting, Council passed the following resolution:

"Council lodge an objection to the development of Winterbourne Wind Farm on the grounds that the following issues, that may impact substantially on residents of Uralla Shire are inadequately addressed by the Environmental Impact Statement:

- **Impact on our Council and Community, including cumulative impacts from other projects in the New England Regional Energy Zone.**
- **Failure to adequately address quantities, sources and transport routes associated with road base, aggregate and sand associated with road, hardstand and tower foundation construction.**
- **Definition of mitigating measures in a qualitative rather than quantitative manner.**
- **Failure to adequately address disposal of general waste and solid non-recyclable waste management issues or to address the impact of their transport on Council roads.**
- **Failure to adequately address the cost and responsibility for decommissioning.**
- **Failure to identify the source of water, nor take into account the potential impact on Council roads and road users of water cartage for concrete production and dust suppression.**
- **Negative impact on visual amenity.**
- **Failure to adequately address significant heritage items**

These points to be expanded to explain the potential impacts and offer solutions."

Issues associated with these points are further expanded below, including possible solutions:

1. **Impact on our Council and Community, including cumulative impacts from other projects in the New England Regional Energy Zone.**

Risk: The cumulative impact of the renewable energy infrastructure within the Uralla Shire will irreversibly change the nature of our community. The visual impact, the impact on businesses, housing, infrastructure and the fundamental structure of our community will change. These changes will benefit some sectors and be detrimental to others. This impact needs to be managed and the management will fall to local government.

Solution: The New England Renewable Energy Zone Councils believe it is essential that proponents of projects take responsibility for the impact on communities through:

- A community contribution fee of 1.5% of build costs
- The provision of a decommissioning bond to NSW Government
- Demonstration of authentic effective community engagement

It would also be beneficial if developers of projects:

- Entered into a power purchasing agreement with councils.
- Purchased at least 75% of the carbon offsets required from within the LGA
- Undertook the construction of telecommunications infrastructure to ensure coverage across the project area and beyond.

2. **Failure to adequately address quantities, sources and transport routes associated with road base, aggregate and sand associated with road, hardstand and tower foundation construction.**

Risk: That the impact of the transport of rock, aggregate and sand required for access roads and foundation construction on council roads and on road users will not be adequately recognised or recompensed.

The EIS under the sections "*Transport Routes*" and "*Road Upgrades*" focusses on the transport route for the turbine and tower components. There is little or no consideration of the transport routes and their impact on local roads and road users for other material. It is anticipated, but not defined in the EIS, that much of this material will be transported on Uralla Shire roads. The Shire must be compensated for the impact of the increased traffic on our infrastructure.

Within Uralla Shire there will be a major transmission line and switchyard both of which will require transport of components along with concrete and hardstand material. This infrastructure will also require road upgrading to enable effective, safe transport. This upgrading is not considered in the EIS.

The analyses of road capacity and local impact focusses on the transport of the towers and turbines. Very little mention is made of the roads associated with the transport of material to construct roads, hardstand areas, foundations and the transmission line. Sources of the material have not been identified consequently they must be imported from outside the footprint or sourced from quarries

within. The source and approval conditions for these quarries must be approved by the relevant Council.

According to the EIS the project will involve the construction of 113 km of internal roads. A conservative estimate indicate that this requires approximately 300,000 tonnes of rock and aggregate for road construction. The EIS does not identify the source of this material, nor the transport routes to get it to the site.

The EIS goes on to state: "*The existing B-double (26m length) approved routes in the broader vicinity of the Project are detailed on the TfNSW combined Higher Mass Limits and Restricted Access Vehicle Map website and is provided within Figure 5. The figure demonstrates that all roads within the vicinity of the Project are rated to accommodate B-double vehicles.*" These roads have been rated for B-double use in the context of use by the local farming businesses. They have been rated on the road capacity to take a limited (but undefined) number of B-doubles per week. This rating is not based on structural capacity to carry the sustained numbers associated with the Wind Farm construction.

The EIS further states: "*The cement and the aggregates needed for concrete production will be sourced locally where possible. Several quarries are available locally as a source of raw materials for concrete production.*" However, in then listing and geographically locating several local quarries, it locates them at their administrative offices, not the material source. This does not enable an effective analysis of impact on roads and road users nor the development of an effective response.

Solution: To meet council expectations the EIS must specify details of:

- Sources of rock, aggregate and water
- Transport routes
- Responsibility for upgrades and maintenance of transport routes
- Rehabilitation of disturbed areas including roads, hardstand areas, and quarries
- Details of the approval process for rock and aggregate extraction

This must involve:

i. an assessment of road capacity and road structural capacity along the transport routes to ensure roads meet the Austroads Standards for the maximum traffic volume and loads they will be subject to.
ii. A pre-condition survey before the project commences and a post-condition survey to ensure the roads are effectively restored at no net cost to the Uralla or Walcha councils.
iii. An assessment of the transport route for the major components associated with the Uralla switchyard and batteries.
iv. An imposition of a Local Government Act s7.11 charge for every kilometre of road used as a transport route that is maintained by Uralla Shire. The charge needs to be negotiated with the Council.
v. Council involvement in the location and conditions applied to approvals for quarries associated with the project. The conditions must be equivalent to conditions Councils have imposed on recent quarry developments in their Council area.

3. **The definition of mitigating measures in a qualitative rather than quantitative manner.**

Risk: The definition of mitigating measures in a qualitative rather than a quantitative manner does not allow measurable monitoring of the mitigating measures. Consequently, there is no way of knowing if the measures have been successful.

Several issues will be addressed by "having plans developed" or have "will be mitigated". There are no quantitative statements that lend themselves to monitoring and management. Where plans are proposed there is no mention of the standard of the plans, the standard of the work or who will have the ultimate decision as to whether or not the actions proposed by the plans to mitigate the issues are adequate; or whether the resultant actual implementation is adequate.

For example:

i. Waste management
ii. Sediment and erosion control:
iii. Dust control
iv. Biodiversity

Solution: A organisation responsible for oversighting the mitigation measures that can define quantitatively the impact of the measures, should be specified in the documents along with specifications for the proponent to bear the financial responsibility for this oversighting.

4. **Failure to adequately address disposal of general waste and solid non-recyclable waste management issues or to address the impact of their transport on Council roads.**

Risk: That local waste management facilities may be overwhelmed with the cumulative impact of receiving general, recyclable and non-recyclable waste from renewable energy projects. The facilities that will receive the non-recyclable waste have not been specified or defined.

The impact of the transport of waste on council roads and on road users will not be adequately recognised or recompensed.

The SEARs requires *the EIS to identify, quantify and classify the likely waste streams to be generated during construction and operation, and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste."* The Environmental impact statement has classified the likely waste streams. However, the EIS does not consider this issue in detail and only proposes the development of a Waste Management Plan and a Decommissioning Plan. There is no mention of the criteria by which these plans will be assessed or who will have responsibility for approving the Plans.

Uralla and Walcha landfills are relatively small, designed to serve their communities with minimal impact from major sources of industrial waste such as that produced by renewable energy projects. Whilst the Uralla Landfill may have the capacity to assist in waste disposal from one renewable project, the cumulative impact of the renewable energy projects proposed for the Shire will overwhelm the Facility.

Solution: A "cradle to grave" approach should be adopted to ensure the project is environmentally sustainable during construction, operation and decommissioning. Additional details should be

provided regarding how the recycled components will be handles and where the non-recyclable component of the waste stream will be disposed of. It be specified in the EIS that the Waste Management Plan and Decommissioning Plan will be developed to the satisfaction of the Local Councils, The Council responsible for the area in which the waste will be disposed and the Environment Protection Authority.

Transport of waste should be managed as for delivery and construction vehicles, also noting road capacity and local impact and ensuring the roads are effectively restored at no net cost to the Uralla or Walcha councils.

5. **Failure to adequately address the cost and responsibility for decommissioning.**

Risk: That the owner of the infrastructure when decommissioning is required, will not have sufficient resources to safely and effectively decommission the infrastructure. The cost will then fall to the Landowner, the Shire Council, or the State Government.

In our free market economy, there are little constraint on who a company can be sold to. If the owner of the infrastructure in 25 to 30 years does not have the resources to decommission there will be no recourse. There is also no reason why the dividends to investors could not be paid out at a level that will allow the accumulation of sufficient resources for decommissioning. This is the reason why mines and large quarries have bonds imposed during the development approval process. While understanding that projects may continue over the 25-30 years, there will eventually be a need to decommission.

Solution A decommissioning plan should be developed and approved by Uralla and Walcha Councils prior to construction commencing. The plan should be accompanied by lodgement of a bond with the State Government as either an upfront payment or an annual payment calculated on a 30 year life of the project is necessary to ensure sufficient resources are available for decommissioning.

6. **Failure to identify the source of water, nor take into account the potential impact on Council roads and road users of water cartage for concrete production and dust suppression.**

Risk: Construction of the infrastructure on the site will require up to 100Ml of water over eighteen to twenty-four months. Two batching plants for concrete will be operating continuously for some months, road construction will require water to enable compaction, and there will be a major need for water for dust suppression during construction and an ongoing need for water for dust suppression and potentially fire-fighting during operation of the wind farm. If this water is carried on any council roads it will have a considerable impact on road condition and on other traffic.

The EIS states: *Because high quality water is required for concrete production, water for this purpose will likely be sourced offsite and transported to the batching plant via water tanker trucks.*
Uralla Shire is concerned that if water is sourced from within the Shire the potential impact of the trucks will be substantial.

Solution: Either the source of water should be identified and impact on local infrastructure defined, or potential options defined along with local infrastructure impact, how they will be addressed and the organisation with the responsibility to see they are addressed.

7. **Negative impact on visual amenity**

Risk: There is no doubt the turbines will dominate the skyline. Some individuals find them intrusive to the extreme in an otherwise rural landscape in close proximity to National Parks. However, in addition to their overall appearance there are potential major issues with shadow flicker and night lighting impacting on individuals.

Shadow flicker has been considered in detail in the report and despite the EIS conclusion on the bases of geometric modelling only (no comparative field data) that "no dwellings have the potential to experience more than 30 hours of shadow flicker per year" and because the impacted roads "have a low frequency of use the potential impact is likely to be low" to potentially affected residents these impacts could be substantial..

Night lighting has two components. Light pollution resulting from security lighting of the infrastructure into this otherwise dark landscape and the red obstacle lights. Despite the EIS analysing and discussing both these components affected residents remain unconvinced that appropriate shading will be effective or that there will be no need for obstacle lighting.

Solution: Favourable determination of the project in relation to these issues should only occur if the theoretical analyses can be supported by the demonstration of acceptable impact from residents affected by similar developments. Radar activated lights on WTG are approved by CASA and could be utilised to lessen impact.

8. **Failure to adequately address significant heritage items**

Risk: The EIS considers in some detail the Aboriginal heritage of the area impacted. Unfortunately, it does not adequately address significant heritage items associated with European settlement and occupation. For example, it does not address the proximity of the Transmission lines to Salisbury Court Homestead and infrastructure. The transmission line will run within 2 km of one of the oldest homesteads in New England, affecting the view.

Solution: The Heritage report should include detail on affected items associated with European settlement.

Thank you for the opportunity to comment.

Yours Sincerely,

Robert Bell

Mayor, Uralla Shire.