

1 August 2025

Kurtis Wathen

Department of Planning, Housing and Infrastructure

Subject: Submission on the Environmental Impact Statement – Tchelery Wind Farm
Application Number: SSD-59701722
EPBC ID number: 2023/09617

Dear Kurtis

Murray River Council (MRC) appreciates the opportunity to provide feedback on the Environmental Impact Statement (EIS) for the proposed Tchelery Wind Farm, located within the Edward River Council area and adjacent to the Murray River Council boundary.

Council acknowledges the potential benefits of renewable energy development. However, Council wishes to raise several concerns and provide recommendations to ensure that the project is delivered in a manner that is environmentally responsible, socially equitable, and regionally coordinated.

1. Assessment Boundaries and Impact Zones

The Environmental Impact Statement (EIS) identifies an 8 km development impact/influence zone as the furthest extent. However, given the vertical scale of the proposed infrastructure, it is recommended that a broader impact distance should be considered. Additionally, the development impact / influence zone is inconsistent across various assessments that include:

- 8 km is used for landscape and visual impact,
- 10 km for vibration and noise, and
- 8 km for stakeholder engagement and identification of affected landowners and occupants.

Where multiple assessment distances are applied, it is standard practice and strongly recommended that the most conservative (i.e., greatest) distance be adopted to ensure comprehensive evaluation.

2. Road Infrastructure, Transport Routes and Traffic Management

Council requests that the entire transport route from port to site, not just local access roads, is given consideration in relation to maintenance and upgrading requirements. This includes assessing and mitigating impacts on regional road infrastructure, particularly where Oversize and/or Overmass vehicles (OSOM) will travel through.

Detailed plans are required addressing traffic management and protection of local infrastructure. The plans should include assessment of cumulative traffic impacts from other concurrent projects within the region. The level of detailed engineering assessment should include:

- Traffic load calculations based on projected vehicle volumes and axle loads.
- Pavement design comparisons showing how existing road structures will withstand the increased traffic.
- Quantitative analysis of asset life degradation and maintenance requirements. This should include identifying the cumulative increase in single axle loads over both the construction and future operational periods.

3. Decommissioning and Waste Management

The EIS lacks clarity regarding the end-of-life waste strategy. Council seeks confirmation on the intended disposal location for waste at the time of decommissioning. This information is essential to assess any potential impact on Council-managed landfills due to increased demand at the end of the infrastructure's 30-year lifespan.

4. Potable Water Supply and Infrastructure Impacts

The Environmental Impact Statement (EIS) does not clearly identify the source of potable water for the proposed development. It references "Council-owned public fill points from standpipes based in Deniliquin, Wanganella, and Boooroban located to the east of the project site." Murray River Council notes that potable water availability at Council-managed standpipes is limited, and access is subject to an application process to ensure there are no adverse impacts on rural communities.

Council requests that any upgrades required to its infrastructure as a result of increased demand from the development be fully funded by the proponent. This includes impacts arising from third-party services, such as water carting to the development and sewer carting from the site.

Given the number of developments proposed in the region with similar resource requirements, Council further requests that the proponent ensures sufficient water supply is secured for the development. If necessary, the scale of the development should be adjusted to align with the available water resources.

Please note the proponent is required to obtain the necessary water licences for the development.

5. Worker Accommodation During Construction

Council emphasises the critical importance of addressing worker accommodation during the construction phase. It is imperative that detailed plans for temporary accommodation are provided, with facilities strategically located to minimise disruption to local communities. These plans must as a minimum include:

- Robust traffic management strategies
- Noise reduction measures
- Protection of resident well-being

6. Environmental Impact Mitigation

Council requests the application of stringent environmental safeguards, including comprehensive waste management protocols, water conservation efforts and measures to ensure accommodation does not negatively impact local wildlife or ecosystems

7. Health and Safety Provisions

The health and safety of workers must be prioritised. This includes:

- Adequate medical facilities and services
- Disease prevention measures
- Independent provision of health services by the proponent, to avoid burdening already strained local health services

8. Post-Construction Workforce Accommodation

Ongoing accommodation needs for the workforce, once the development is operational, must be addressed. Given the severe housing shortage in local communities, the proponent must:

- Provide adequate accommodation for their workers

- Avoid reliance on existing community housing supply
- Develop an Accommodation Strategy and consult the respective Councils (including Murray River Council) during the creation of the strategy.

9. Workforce Development Strategy

Council requests that the proponent prepare a Workforce Development Strategy, with Council input prior to its finalisation. The Strategy should prioritise training and employing local residents wherever possible, thereby enhancing local skillsets and delivering long-term economic benefits to the community. It should also include targeted support for Aboriginal and/or Torres Strait Islander communities, in alignment with the First Nations Guidelines referenced in the SIA.

10. Long-Term Employment and Local Business Engagement

Proponents should create long-term employment opportunities for local residents, both during construction and in ongoing operational roles. Additionally, they should engage with and support local businesses to source materials and services locally where possible.

11. Community Consultation and Engagement

Ongoing community consultation / transparent communication is essential throughout the project to address community concerns and keep residents informed. Council highlights the importance of procedural fairness and expects meaningful engagement with all directly and indirectly affected stakeholders, including landholders not directly hosting infrastructure. Council recommends a centralised and coordinated engagement approach across multiple projects would be beneficial to reduce consultation fatigue

12. Developer Contributions and Benefit-Sharing

Council expects proponents to negotiate contributions, including the establishment of Voluntary Planning Agreements with the eligible councils. These contributions should reflect the scale of the project and its cumulative impact on local infrastructure, services, and amenity. Council also requests that benefit-sharing programs be co-designed with local government to ensure alignment with community priorities and maximum local impact.

13. Cumulative Impact Assessment

Proponents must conduct comprehensive assessments of the cumulative impacts of their proposals, considering:



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- Combined effects with other existing or proposed major projects in the region
- Overall environmental, social, and infrastructure impacts evaluation to ensure sustainable development

Council is particularly concerned about the cumulative impacts and compounding effects on housing, emergency services, road infrastructure, and community cohesion.

Additionally, in the presence of other existing or approved wind farms in the surrounding area, such as Keri Keri Wind Farm, Baldon Wind Farm, and Wilan Wind Farm etc (refer to page 12 of EIS) proponents must also assess the cumulative impact on bushfire aerial firefighting capacity. This assessment should be conducted within a 100 km radius, in accordance with the *Cumulative Impact Guidelines for State Significant Projects*.

14. Balanced Development Approach

While Council recognises the potential economic benefits of these projects, we stress the need for a balanced approach. Adhering to the outlined requirements and strategies will help ensure the project is delivered safely, sustainably and with minimal impact on the environment and local townships of Murray River Council.

Council looks forward to continued engagement with the Department and the proponent/developer to ensure these matters are addressed.

Should you require further information, please contact Leeyana Thokala on during business hours on 0455780059 / 1300 087 004 or email lthokala@murrayriver.nsw.gov.au.

Yours sincerely
Jessica McFarlane
Manager Development Services
Murray River Council