



29 August 2025

To NSW Department of Planning Housing and Infrastructure

Comments on Birriwa Solar Modification, SSD-29508870-Mod-1, Barneys Reef Road, Birriwa, by ACEN Australia Pty Ltd, by Central West Cycle Trail Incorporated.

*Note: the Central West Cycle Trail Incorporated is a not-for-profit association under NSW legislation.

SUMMARY

The Central West Cycle Trail Incorporated (CWCT Inc) is objecting to the aspects of the road design.

The renewable energy developments in the Birriwa area are in a highly cleared landscape. The remnants of grassy woodland are now concentrated along the narrow roads that provide amenity for the cyclists on the Central West Cycle Trail (CWCT). The modification proposes their removal to provide an accessway for the Birriwa Solar project.

Opportunity exists to provide accessways for renewable energy infrastructure across already cleared land rather than clearing the limited remnants centred on local roads. To achieve this outcome ACEN must be able to access land owned by the NSW State Government body Energy Co. This will avoid the need for ACEN to undertake clearing on Birriwa Bus Route South.

Offsets proposed cannot meet the policy aim of providing 'like for like' in the case of removal of centuries old hollow-bearing trees.

To preserve the qualities of CWCT alternative cycle routes (which maximise separation of bicycle from construction traffic) should be implemented. ACEN and Energy Co who are creating the impact on the CWCT should be taking responsibility for achieving the upgrade of Upper Barney's Reef Rd south of the Mid-Western Regional Council Waste Facility and using their own land to providing alternative access during construction.

General Points

1. A guiding principle in the implementation of any renewable energy infrastructure must be minimal removal of roadside vegetation. The grassy woodlands of the Birriwa renewable energy area have been very extensively cleared (see image below) with roadsides being the main area of remnants. The roadsides also provide all important corridors from the more wooded ironbark ridges of Barneys Reef to the riparian zone of the Talbragar River.



2. Given the extensive areas of already cleared land, much of which is held by renewable energy companies, accessways should be outside of the currently vegetated roadsides if that requires tree/shrub removal.
3. To manage the menagerie of developments Government planning and regulatory bodies need to have an overall co-ordinating view, ensuring that cumulative impacts are assessed and that the opportunity for co-operation across projects occurs to achieve best outcomes. The CWC is aware that ACEN's inability to gain access to Energy Co land running west from Merotherie Rd is forcing their hand to seek approval for clearing of roadside vegetation on Birriwa Bus Route South. Image below shows local Dunedoo residents Sharon Nott and Sue Stoddart on Birriwa Bus Route South, a valuable vegetation corridor of the now highly cleared grassy woodlands of the area.



4. The systems of offsets will not create a 'like for like' alternative for the removal of massive centuries old hollow-bearing tree so critical for Australian fauna. Rather than removal of roadside vegetation the direction should be reintroducing woodland vegetation outwards from these remnants. The extent of the infrastructure footprint and area of lands held by renewable energy companies means there are considerable opportunities for cleared land to be regenerated.

The vision that the renewable energy future protects the environment must not be depreciated by actions such as the clearing of extremely limited areas of grassy woodland vegetation and the loss of wildlife corridors.

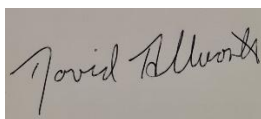
5. The ethos of cycle touring is that it is an environmentally-friendly low greenhouse gas form of recreation, that enjoys the amenity of the Australian landscape. Hence the retention/expansion of wooded areas is highly consistent with that ethos. In practical terms roadside vegetation provides sun protection to riders and reduces taxing headwinds whilst riding. Shady laneways as shown in the previous image extend the cycling season window into warmer months.
6. The CWCT along Merotherie Rd and Birriwa Bus Route South has provided quiet rural cycling. Locally the development of the quiet cycling route of the CWCT was borne out of the death of a cyclist and friend on Ulan Rd as it approaches Mudgee. It created the search for quiet cycling opportunities for both local residents and those visiting the area. Records of who has travelled on the trail indicate that the trail is highly popular with coastal residents who live in a considerably more trafficked cycling environment. It features as one of the top rides in Lonely Planet's 2023 published *Epic Bike Rides of Australia & New Zealand*.

7. A key by-product is that the CWCT has provided a measurable economic boost to small towns through which it passes. The case study of Mendooran illustrates this. When the trail first started in 2020 accommodation was limited to the sole pub and a converted shop owned by the Services Club. Since then, accommodation has increased with a BnB, a re-opening of a pub as solely accommodation, and cabins on the edge of town. Cycling has proven an extremely low-cost way of boosting the fortunes of small towns that can be overshadowed by larger neighbouring towns. Cyclists will stop in small towns like Mendooran, Ballimore, Geurie seeking meals, accommodation and supplies for the next day's riding. The CWCT has been created without the contribution of one dollar of public funds to the Central West Cycle Committee showing the economic return on highlighting quiet cycle routes and their signage.

A cyclist, depending on the level of accommodation sought, will spend between \$120 to \$250 a day whilst on the trail. Normal length of time that a cyclist will spend on the CWCT is 4 to 6 days, meaning an expenditure of \$500 (low) to above \$1000 whilst on the trail. With 1500 to 3000 people cycling the trail each year, the economy of the trail can be measured in millions of dollars.

8. The traffic control provisions to cater for cyclists during construction set out in the Modification document are a positive. However, they fall short in the proponent adequately taking responsibility for providing alternatives for cyclists that maintain the essential characters of the trail that will be impacted by the proposal as it currently stands. Cycling through a construction zone is not going to attract cyclists. Proponents of renewable energy in the Birriwa area, ACEN and Energy Co, should be actively bringing online alternative routes, both across cleared lands (Appendix 1) and along Upper Barney's Reef Rd (Appendix 2). CWCT Inc should not be having to be bearing the financial and time costs of remedying the impacts of the renewable energy development.
9. The CWCT is known for providing the small town/rural landscape experience and hours of low or no motor vehicle traffic. There are sections of the trail which require getting back on busier sections of road to get to the next section. A key priority of the CWCT committee is finding alternatives to minimise the number and extent of these busier sections. Cyclists are not looking to mix it with fast traffic or ride through construction zones. The CWCT being a series of sequential day-long rides loses its appeal as busier sections increase in number and length. The Modification threatens increasing the number and length of busy sections, particularly during construction.

Yours sincerely



David Allworth
Secretary Mobile 0408 726 038

Appendix 1

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Penny Sharpe
Minister for Environment
cc Minister for Planning

25 May 2025

Dear Minister,

Re: Roadside Vegetation - Birriwa Energy Hub and Solar Power Developments -Alternatives

The Central West Cycle Trail for close to 5 years has utilised Merotherie Rd and Birriwa Bus Route South Rd as quiet country lanes lined with shady trees. Many thousands of cyclists have now travelled this route.

The Central West Cycle Trail Committee is concerned to learn that current approvals and proposals require the removal of trees along 8km to 9km of public road. Those roads being:

- a. Merotherie Rd from 4km south of the Golden Highway to a Crown road approximately 9.8km south of the Golden Highway, and
- b. Birriwa Bus Route South from Merotherie Rd to approximately 3.2km west.

We believe that alternatives to this felling of trees exist. Our proposed alternative routes are shown on Figure 1. We are not privy to all property ownership moves and landholder agreements, so this is a concept plan that needs concrete detail for implementation. Our plan is broadly that roads required for the access to accommodation camps, energy hub and solar arrays should be brought onto cleared agricultural land. Much of the land required is already or will be owned by Energy Co or ACEN.

In simple terms these roads are lined with mature trees, some with hollows. The use of biodiversity offsets or placing of felled trees as large woody debris in neighbouring paddocks are not a substitute for avoidance when this option is available.

It takes centuries to achieve the size of the some of the trees along the roadside. An outcome of the renewable energy projects surely should be the enhancing of the environment. Roadside vegetation should be being planted not felled.

The overall concept of our alternative is shown in the accompanying map, and if fully implemented would protect close to 9km of roadside vegetation. The following points are important:

1. Energy Co owns land from 4km south of the Golden Highway and hence is readily positioned to implement Route 1 shown, which would protect 1.8km of roadside vegetation.
2. Energy Co must co-operate with ACEN to give access for the construction of Route 2, which will allow ACEN to avoid clearing along 3.4km of Birriwa Bus Route South. ACEN is keen for to be able to use Energy Co land for access.
3. Route 3 allows ACEN to use 3.5km of Merotherie Rd to access its Narragamba Solar Project. Route 3 has the issue of 250 metres of box-gum woodland mature trees if the current Crown

road alignment is followed. Discussions are needed with the adjacent landholders to see if some land swap arrangement could be reached.

In ending, local groups have put variations of this alternative proposal to Energy Co's construction body ACEREZ in the past months. This has been met with a solid 'no'. We believe it is incumbent on the state agency for protecting the environment to be the forefront of ensuring at every possible turn the environment is protected. In this case there is a very clear option to do so.

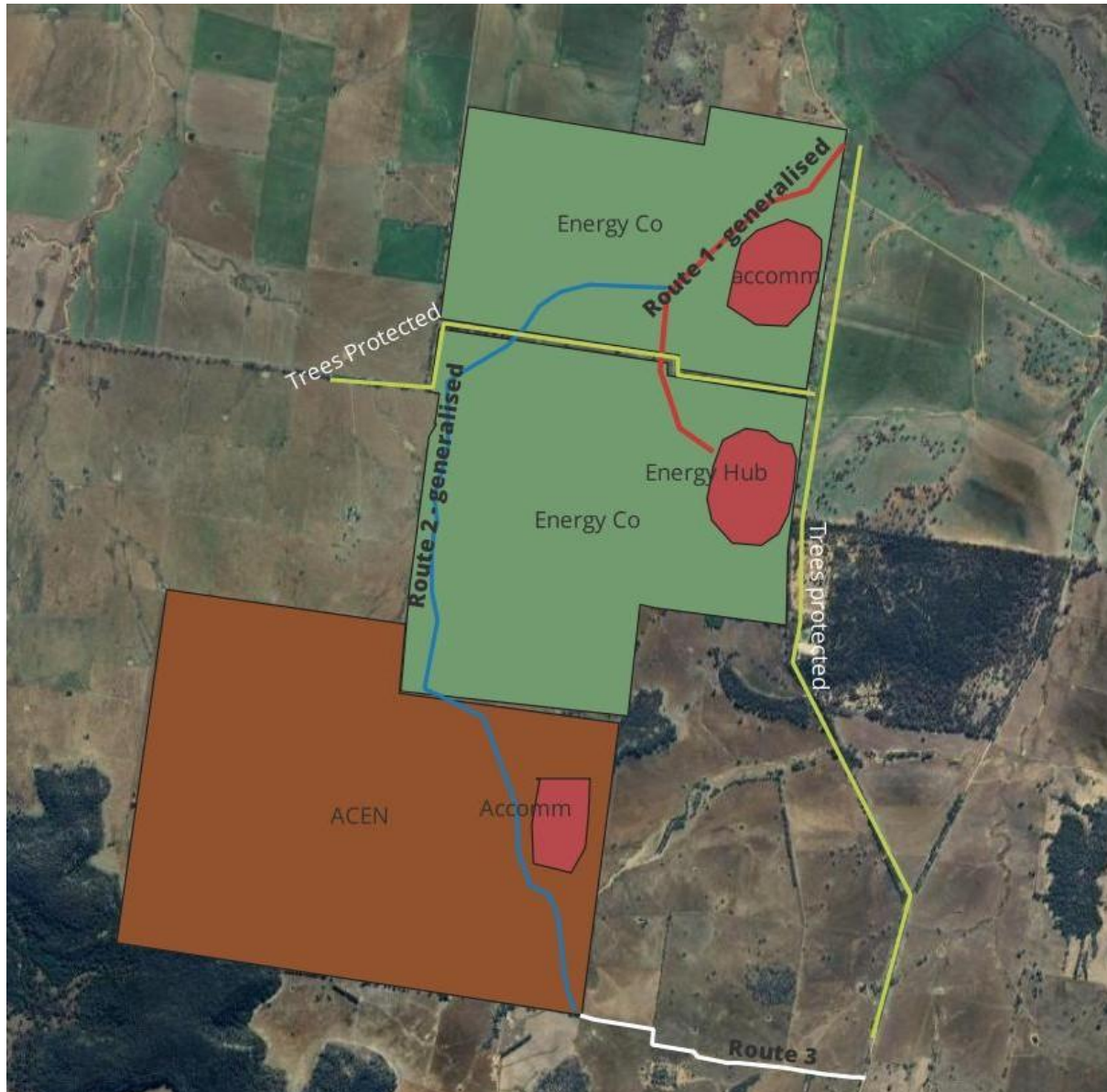


Figure 1: Route 1 leads to from Merotherie Rd 4km south of Golden Highway to Energy Hub, Route 2 leads to ACEN's accommodation, and Route 3 leads from ACEN accommodation to Merotherie Rd.

Yours sincerely

David Allworth, Secretary Mobile 0408 726 038

Barney's Reef Rd north of junction with Merotherie Rd (aka Slap Dash Creek Adventure Trail)
cycle track upgrades for avoiding
renewable energy traffic volumes on current CWC trail



Central West Cycle Trail Inc

16 March 2025

Background

Currently the principal Central West Cycle Trail between Gulgong and Dunedoo travels via Barney's Reef Rd, Merotherie and Bus Route South to Birriwa, thence onto Dunedoo.

Construction work around the corner of Birriwa Bus Route South and Merotherie Rd has now increased traffic volumes, making this route a far less attractive and less safe cycling option.

An alternative route option is to use Barney's Reef Rd north of its junction with Merotherie Rd to Birriwa Bus Route South (near Birriwa Refuse Depot). This route is currently an 'adventure side trail' in the CWC circuit and is used by technically more confident riders looking for creek crossings and rutted roads to test skills.

This alternative route is 15.5km long. The southern 8.9 km is an attractive quiet cycling experience suitable for a wide range of cyclists. However, the northern 6.5km is not maintained and is suited to a more limited range of cyclists.

The CWC seeks to upgrade the track to cater for the full spectrum of trail users with:

1. 750m of grading and installation of cross drains from the crest of Barney's Reef range north,
2. Culverts installed in 3 creek crossings with narrow concrete track to top of embankment. In one creek crossing the option of an expanded metal walkway/cycle bridge of 7 to 10m length should be considered,
3. A raised gravel bicycle track (0.2 to 0.3m height) over 450m of seasonally boggy area, and
4. Slashing of existing track which provides a very sound smooth surface for cycling.

Figure 1 shows the general location of works and Figure 2 outlines the construction works needed at each location.

Creation of a trail to cater for a bicycle does not require demanding engineering. It is emphasised that it would be of great benefit to the trail if the installed works were designed for bicycles and not motor vehicles. This would provide an outstanding cycle route on the CWC trail.

CWC is looking for costs of works to be met by renewable energy companies ACEN and ACEREZ whose works are creating or will create extra traffic volumes.

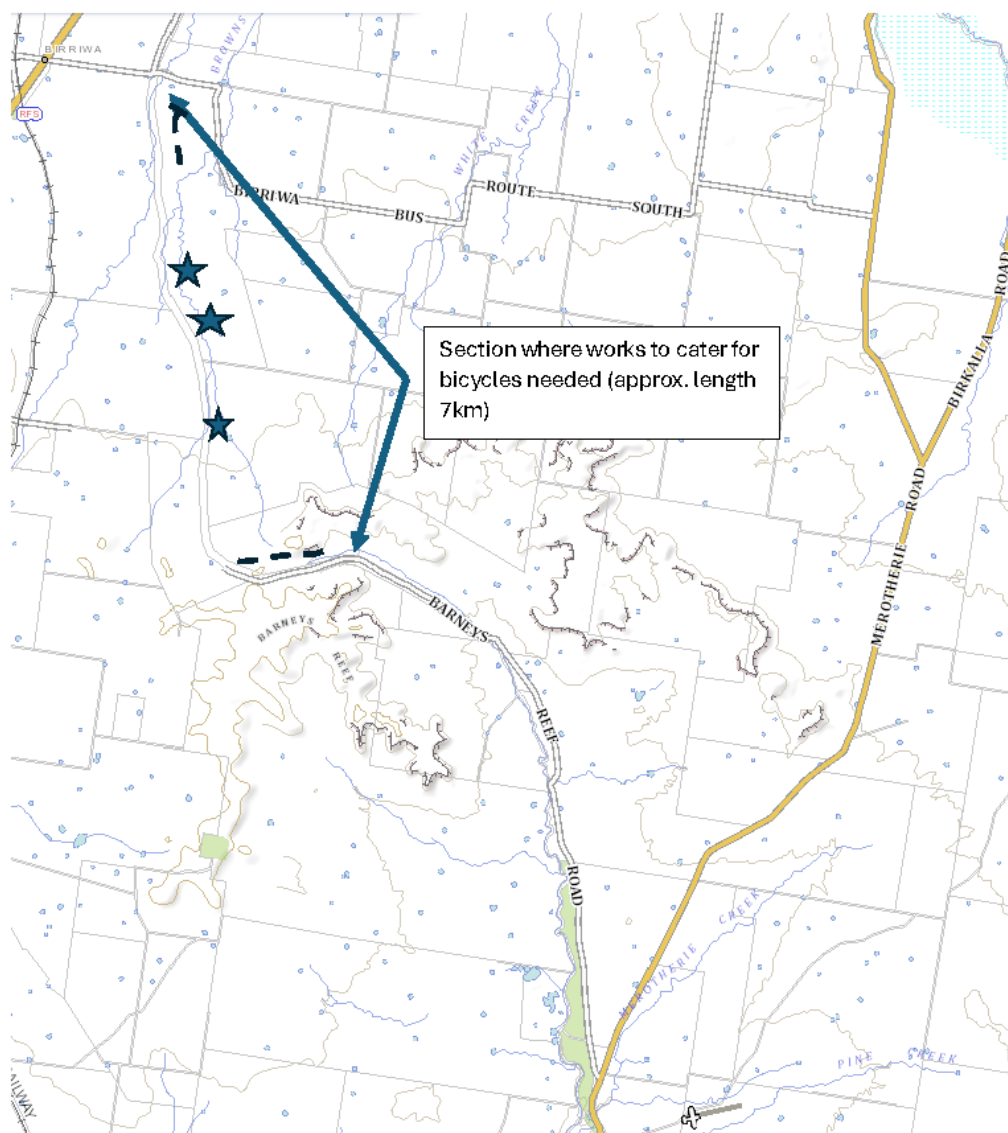


Figure 1: Barney's Reef Rd from junction with Merotherie Rd to Birriwa Bus Route South.

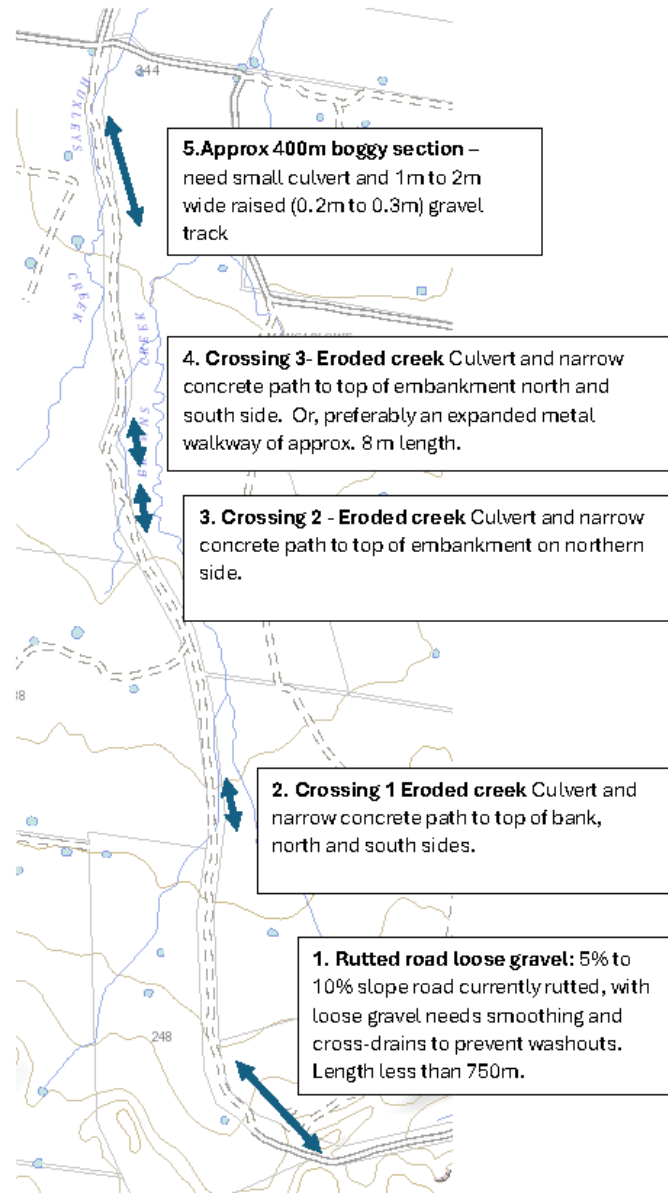
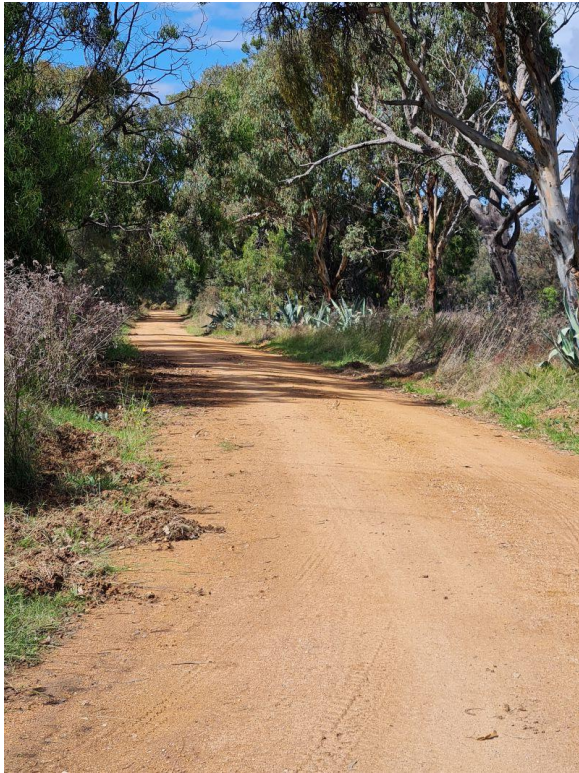


Figure 2: Works required in northern section of unmaintained Barney's Reef Rd between crest of Barney's Reef range to Birriwa Bus Route South distance of 7km.



Start of the Barney's Reef Rd alternative route. These 'champagne gravel' road conditions extend for 6 km of the 15.5km. This section is well maintained by the local council.



From kilometre 6 to kilometre 8.9 the road is less maintained but still provides an excellent cycle trail.



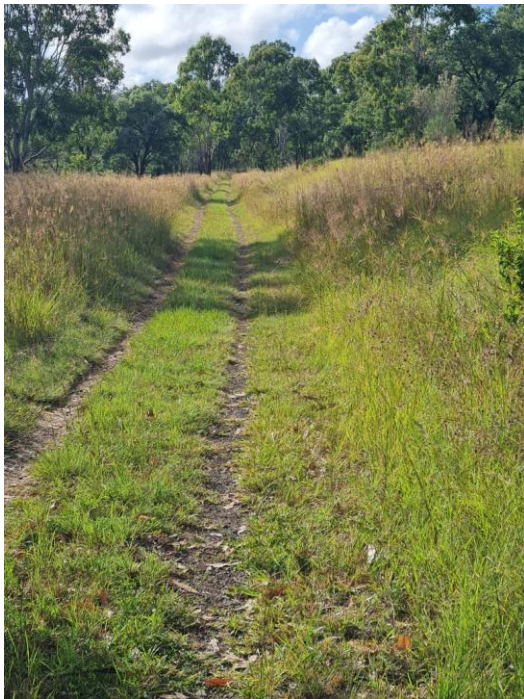
From km 8.9 to km 9.5 there is steep section of track which is eroded and has loose gravel. Track has a slope of 5% to 10%. **Grading and installation of cross drain needed to prevent future erosion.**



Typical style of track for km 9.5 to km 15.0. The surface is usually smooth, following old wheel tracks. Generally good cycling facility other than the challenge of 3 creek crossings and a seasonally boggy area of 500m at the northern section just before reaching Birriwa Bus Route South.



However, in parts the smooth wheel/stock pads are overgrown with grass after a good season. **Slashing needed.**



Slashing of an overgrown track immediately makes the track very rideable. Image of the Brisbane Valley Rail Trail after slashing of section.



Some parts of the trail on sloping land are eroded. **Repair of these ruts is a secondary priority but would enhance the trail. The installation of cross drains would be valuable.**





Crossing 1: This crossing is the least challenging for cyclists currently but **warrants a culvert and concrete track to top of embankment** as shown below. Culverts shown are on the Brisbane Valley Rail Trail.





Crossing 2 – similar treatment as needed for Crossing 1 – culvert plus concrete track to top of embankment.

. Cycylists are happy to go through water but banks with rough and loose surfaces in conjunction with steep ascent grades cause problems for both riding and pushing a loaded bicycle.



Image below is immediately adjacent to Crossing 2 and shows the common phenomena of sheer walls on flowline. Crossing options are limited



The Slap Dash Creek Adventure trail has provided challenge and amusement for many trail cyclists, but the few pinch points has limited the spectrum of riders.



Crossing 3 – this crossing is steep sided creek. **Needs culvert and concrete track to top of embankment on grade of preferably less than 7%. Alternatively, an expanded metal walkway across gully next to fence pictured in lower image.** Some work would be needed to ensure stabilised flowline so sides do not move erode laterally.





The very northern end of the trail (next to Birriwa Refuse Depot) is a zone where water spreading creates a boggy area, which can persist for many weeks, sometimes months. To make this area passable in all-weather a raised gravel track needs to be built and water allowed to flow away with insertion of culvert pipes in the shallow flowline.



In a normal season the boggy area dries out, but ruts caused by the occasional vehicle movement are problematic for cycling.



Example of the type of gravel path that is needed across the boggy section at very northern end of Barney Reef Rd, near Birriwa Refuse Depot. Track in picture is at Putta Bucca wetlands, Mudgee.