

26 February 2018

Mr Tim Stuckey
Planning Officer
Resource and Energy Assessments - Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Tim

RE: MODIFICATION OF WHITE ROCK WIND FARM PROJECT (10_0160)

I refer the application to further modify the White Rock Wind Farm Project (10_0160), located 20 km west of Glen Innes in the Glen Innes Severn Local Government Area. Council notes the proposed modification, submitted by White Rock Wind Farm Pty Ltd involving:

- Reducing the overall number of Stage 2 turbines from 49 to 48;
- Increasing the overall rotor tip height of Stage 2 turbines, from 150 m to 200 m;
- Increasing the overall project area, including relocation of some turbines and associated ancillary infrastructure; and
- Increasing the project's vegetation clearance limit.

Council wishes to make the following submission regarding the proposed amendments to White Rock Wind Farm Project (10_0160):

1. No details of how waste will be dealt with from the development. In this regard a Waste Management Plan should be prepared prior to construction commencing. Council is concerned regarding the amount of waste being generated from the wind farms and the general lack of effort to sort and recycling waste therefore having a significant impact on the Glen Innes Landfill capacity and life span.
2. A road opening permit will be required under the provisions of section 138 of the *Roads Act 1993* for any upgrades to the proposed access road to the Wind Farm.
3. In view of the increase in size it is recommended that the Proponent prepare a Noise Compliance Report which assesses the performance of the project against the operational noise criteria as specified in the environmental assessment.
4. In the event that the Noise Compliance Plan indicates that noise from the wind turbines exceeds the noise limits specified under the environmental assessment, as relevant, the Proponent shall investigate and propose mitigation and management measures to achieve compliance with the noise limits.
5. It appears that the EIS has not included any analysis of traffic or transport impact. A full analysis of the impact on haulage routes should be undertaken. This should incorporate an assessment of the impact that was actually incurred in Stage 1,

and whether the dilapidation agreement that was in place for stage 1 adequately captured the impacts on the network. This should be completed by the same contractor that performed the dilapidation surveys for stage 1, and all information collected with regard to road dilapidation should be made available publicly.

6. Council notes that operation of the White Rock Wind Farm commenced prior to the finalisation of the road dilapidation agreement for Stage 1. A mechanism should be incorporated that requires sign off from the roads authority prior to commencement of commercial operations.

For any further information please do not hesitate to contact Council's Director of Development, Planning & Regulatory Services on 6730 2365.

Yours sincerely

Graham Price
**DIRECTOR OF DEVELOPMENT, PLANNING &
REGULATORY SERVICES**