



Winterbourne Wind Farm

Submissions Report

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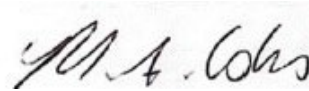
Winterbourne Wind Farm

Submissions Report

0526676



Martin Kim
Senior Environmental Consultant



Meg Coles
Managing Consultant



Simon Bennett
Principal Consultant



Mark Davey
Partner

Environmental Resources Management
Australia Pty Ltd
Level 14, 207 Kent Street
Sydney NSW 2000
T +61 2 8584 8888

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHMP	Aboriginal Cultural Heritage Management Plan
AGL	Above Ground Level
AHIMS	Aboriginal Heritage Information Management System
AIA	Aviation Impact Assessment
ALAs	Aircraft Landing Areas
AMSL	Above Mean Sea Level
ARTC	Australian Rail Track Corporation
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BDAR	Biodiversity Development Assessment Report
BESS	Battery Energy Storage System
CBF	Community Benefit Fund
CIA Guidelines	Cumulative Impact Assessment Guidelines for State Significant Projects
CIP	Copenhagen Infrastructure Partners
COP	Conference of Parties
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPE	NSW Department of Planning and Environment (now DPHI)
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EMI	Electromagnetic Interference
EPA	NSW Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cwlth)
FTE	Full Time Equivalent
GW	Gigawatt
IPC	Independent Planning Commission
kV	Kilovolt
LALC	Local Aboriginal Land Council
LGA	Local Government Area
LSALT	Lowest Safe Altitude
LVIA	Landscape and Visual Impact Assessment
Met mast	Meteorological Monitoring Masts

Acronyms	Description
MOC	Minimum Obstacle Clearance
MW	Megawatt
MWh	Megawatt hour
NASF	National Airports Safeguarding Framework
NEM	National Electricity Market
NEO	National Electricity Objective
NIA	Noise Impact Assessment
OLS	Obstacle Limitation Surfaces
OSOM	Over Size Over Mass
PAD	Potential Archaeological Deposit
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
PHA	Preliminary Hazard Analysis
RAPs	Registered Aboriginal Parties
RET	Renewable Energy Target
REZ	Renewable Energy Zone
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SSD	State Significant Development
TECs	Threatened ecological communities
TfNSW	Transport for NSW
TIA	Traffic Impact Assessment
TMP	Traffic Management Plan
UCLs	Urban Centres and Localities
Vestas	Vestas Wind Systems A/S
Visual Bulletin	Wind Energy: Visual Assessment Bulletin for State significant wind energy development
WPI	Wind Power Invest
WTGs	Wind Turbine Generators
ZVI	Zone of Visual Influence

EXECUTIVE SUMMARY

INTRODUCTION

WinterbourneWind Pty Ltd (the Applicant) is seeking approval to construct, operate and decommission the Winterbourne Wind Farm (the Project), located at its closest point about 6.5 kilometres (km) northeast of Walcha in the New England Tablelands region of New South Wales (NSW).

Approval for the Project is sought under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). and Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

In support of the SSD application (SSD-10471), an Environmental Impact Statement (EIS) was prepared and was publicly exhibited between 18 November 2022 and 23 January 2023 by the (then) NSW Department of Planning and Environment (DPE) (now NSW Department of Planning, Housing and Infrastructure [DPHI]).

During the public exhibition period, 959 submissions were received (excluding duplicates). These submissions are categorised as follows:

- 924 public submissions (excluding duplicates);
- 14 organisation submissions;
- 4 local council submissions; and
- 17 submissions with advice from government agencies.

A request from DPE was subsequently issued to WinterbourneWind to prepare a Submissions Report for the Project. This Submissions Report has been prepared in response to that request and in accordance with clause 59(2) of the Environmental Planning and Assessment Regulations 2021, and the State Significant Development Guidelines – Preparing a Submissions Report (Appendix C of the State Significant Development Guidelines).

ANALYSIS OF SUBMISSIONS

Seventeen (17) government agencies provided comment and advice on the Project (i.e., did not object or support), with some requesting further clarifications regarding environmental or social aspects of the assessment. Four councils provided submissions including Walcha Council, Uralla Shire Council, City of Newcastle Council and Muswellbrook Shire Council.

Of the 924 public submissions, 488 (53%) were in support of the Project, 428 (46%) were in objection of the Project, and 8 (1%) provided comments only.

A breakdown of the submissions by type (i.e., support, object, comment) is detailed in Table E-1.

TABLE E-1 NUMBER OF SUBMISSIONS RECEIVED

Type	Object	Support	Comment	Total
Public	428	488	8	924
Organisation	6	5	3	14
Local council	2	0	2	4

Type	Object	Support	Comment	Total
Agency advice	-	-	17	17
TOTAL	436	493	30	959

Of the 924 public submissions received, 78 (8%) were from the local area (<5 km from the Project), 351 (38%) were from the region regional (5-100 km from the Project), 374 (41%) were from the broader community (>100 km from the Project), and 121 (13%) were undetermined (i.e., did not provide a location).

Submissions in support of the Project highlighted how it would facilitate Australia's transition to a low-carbon economy and energy system and in doing so reduce emissions of greenhouse gases that are linked to anthropogenic climate change. Support themes also included comment on the significant social and economic benefits of the Project, including employment, infrastructure upgrades and the community benefit fund (CBF). Many of the submissions objecting to the Project were opposed to windfarms generally, did not support the New England Renewable Energy Zone (REZ), and argued that other energy sources should be considered and/or be located close to larger population centres.

ACTIONS TAKEN SINCE EXHIBITION

Since lodgement and exhibition of the EIS, the Applicant has continued to engage with the community and key stakeholders. Public engagement activities have included a stall at the Walcha Show in March 2023 and 2024, a street stall in Uralla in May 2023, and a Project Office in Walcha open to the public across 8 months in 2023 and since June 2024. Face to face meetings have been held with twelve local businesses. Newsletter updates have been issued periodically by mail and email and a Project website is maintained. The Applicant has also continued engagement with relevant NSW and Federal Government agencies, the surrounding community and community groups, Aboriginal groups, proximate landholders and infrastructure owners.

In response to issues raised in public submissions and by government agencies, the Project has been amended to reduce its impacts. These amendments are covered in detail in the Amendment Report and should be read in conjunction with this Submissions Report.

The key changes in the Amended Project are:

- Reconfiguration of the Project layout including relocation of 21 WTGs (moved > 100m), micro-siting of 52 WTGs (moved < 100m), removal of 2 WTGs and addition of 1 WTG;
- Changes to the Project Area with removal of 13, and addition of 1 land parcels within the Project Area, and addition of 1 land parcel along the transport route;
- Realignment of site access locations and internal access tracks, and electrical reticulation;
- Relocation of both substations, the O&M facility, construction compound, BESS and laydown areas;
- Construction of on-site quarry to supply gravel, aggregates and potentially bedding material required for Project construction;
- Construction of on-site groundwater bores to supply water required for Project construction and operation; and
- Inclusion of a new transport route to avoid Oxley Highway for inbound oversize and overmass (OSOM) vehicles.

The layout of the Project and siting of WTGs and other key infrastructure components has been subject to an ongoing iterative design and siting process, considering environmental, civil engineering and wind generation constraints and opportunities, as well as consideration of issues raised during ongoing community engagement.

The Applicant has engaged with landowners, Project neighbours, the broader community, local government, State and Federal Government agencies, and business and stakeholder groups since acquisition of the Project in 2019.

Throughout the planning phase of the Project, a range of alternative Project designs have been considered in the context of technical, environmental, social, and commercial constraints. The Amended Project has:

- Further avoided and/or minimised adverse environmental impacts;
- Protected sensitive areas and receivers identified through specialist assessments including biodiversity, noise, visual, heritage, hazards and risks, and water;
- Addressed matters raised in submissions of the exhibited Project EIS and outcomes of ongoing engagement with the community, landowners, government agencies, local council and other stakeholders;
- Maximised the yield of wind power generation through suitable positioning of WTGs on-site and in consideration of environmental constraints;
- Maintained minimum Project generation capacity to achieve commercial viability of the Project in the context of the cost required to connect to the existing electrical grid; and
- Optimised accessibility of Project elements through identifying constructability constraints and strategically positioning Project elements to minimise earthworks required during construction and thereby further reduce potential biodiversity impact.

RESPONSE TO SUBMISSIONS

This Submissions Report provides an analysis of the issues raised, explains what actions have been taken by the Applicant since the EIS was exhibited, provides a response to issues raised, and an updated justification and evaluation of the Project.

PROJECT JUSTIFICATION

The Project, as amended, is expected to generate around 2,100,000 megawatt hours (MWh) per year of clean, renewable energy — enough to power more than 375,000 NSW homes on average. The Project will deliver renewable, low-cost energy to the national grid and contribute to the NSW Government's net-zero emissions target by 2050. The Project will further provide a significant amount of the new generation capacity required as coal-fired power stations are retired over the next decade, including the 2,880 MW Eraring Power Station (scheduled to close in 2027).

The Project will primarily be developed on agricultural land which has been previously disturbed and/or historically cleared. Wind farms are very much compatible with existing farming operations as the turbines occupy only a small amount of land, and landowners can continue normal grazing or cropping activities. Livestock has often been seen using turbine towers for shade and shelter from wind and rain.

The Project layout has been designed and revised to maximise the use of existing disturbed areas and to avoid or minimise impacts, including to identified biodiversity and Aboriginal cultural heritage values. Progressive design iterations for the turbines, ancillary infrastructure, and the transmission line corridor have continued with key drivers being measures to minimise and avoid environmental and social impacts in line with the Avoid-Minimise-Mitigate-Offset design hierarchy.

The Project will create a range of social and economic benefits which will create substantial capital investment in Walcha and Uralla and the broader New England region. The Project is anticipated to generate up to 390 FTE construction jobs, in turn creating approximately \$150 million in direct wages and profits, and more than \$160 million in indirect wages and profits, per year of construction. The construction workforce will generate more economic activity at local restaurants, shops and businesses, and will possibly lead to higher occupancy rates in temporary accommodation.

During Project operations, the Project will generate up to 16 FTE jobs and \$25 million per year in direct and indirect economic benefit for the local region. The Applicant will operate and maintain the WTGs and other infrastructure to ensure safe and efficient facilities that optimise energy generation. The Project service team will include around 16 skilled staff permanently based in Walcha or surrounding towns, who will become part of the local community.

There will be opportunities for local contractors and businesses to supply services during Project construction and operation. The Project will offer training and development to upskill the regional workforce to support the growing renewable energy industry.

The Project will further provide a diversified income stream for host landholders which will help make host farms more resilient to the impacts of droughts, fires and commodity price fluctuations.

A VPA has been entered into between the Applicant, Walcha Council and Uralla Shire Council. Under the VPA, the Applicant is to allocate funds to two CBFs for the purpose of providing funding within the Walcha and Uralla Shire LGAs.

Through the implementation of best practice management, the potential environmental impacts associated with the Project can be appropriately managed, which will also address the community concerns and associated social impacts identified during the stakeholder engagement process.

1. INTRODUCTION

WinterbourneWind Pty Ltd (the Applicant) is seeking approval to construct, operate and decommission the Winterbourne Wind Farm (the Project), located at its closest point about 6.5 kilometres (km) northeast of Walcha in the New England Tablelands region of New South Wales (NSW). **Figure 1-1** provides the regional context of the Project and **Figure 1-2** the Project locality plan.

Approval for the Project is sought under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the Project is declared State Significant Development (SSD) by reason of Part 2.2, clause 2.6 and Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP).

A referral (EPBC Ref: 2020/8734) was made under the *Environment Protection and Biodiversity Conservation Act 1999* (Cwlth.) (EPBC Act). The Project was determined to be a 'controlled action' on 31 August 2020 and approval is required under Part 9 of the EPBC Act.

In support of the SSD application (SSD-10471), an Environmental Impact Statement (EIS) was prepared for the Project (ERM, 2022). The EIS was publicly exhibited between 18 November 2022 and 23 January 2023 by the (then) NSW Department of Planning and Environment (DPE) (now NSW Department of Planning, Housing and Infrastructure (DPHI)).

During the public exhibition period, 959 submissions were received (excluding duplicates). These submissions are categorised as follows:

- 924 public submissions (excluding duplicates);
- 14 organisation submissions;
- 4 local council submissions; and
- 17 submissions with advice from government agencies.

This Submissions Report has been prepared in accordance with the *State Significant Development Guidelines – Appendix C: Preparing a Submissions Report* (DPHI, 2024), and responds to the matters raised in the submissions.

This Submissions Report should be read in conjunction with the Amendment Report (ERM, 2024) and the [EIS \(ERM, 2022\)](#). The Project, as amended, involves the construction, operation and commissioning of a wind farm with up to 118 wind turbine generators (WTGs) together with associated and ancillary infrastructure. The Project layout as presented in the EIS is provided in **Figure 1-3**. The amended Project layout is illustrated in **Figure 1-4**. The proposed amendments to the Project are considered further in the Amendment Report and are summarised in **Table 1-1**.

This Submissions Report provides an analysis of the issues raised in submissions and explains what actions have been taken by the Applicant since the EIS was exhibited. The Submissions Report provides a response to the issues raised in the submissions and an updated justification and evaluation of the Project. **Appendix A** of this Submissions Report includes a submission register listing the submitters and the section where the issues raised have been addressed in either the Submissions Report or Amendment Report.

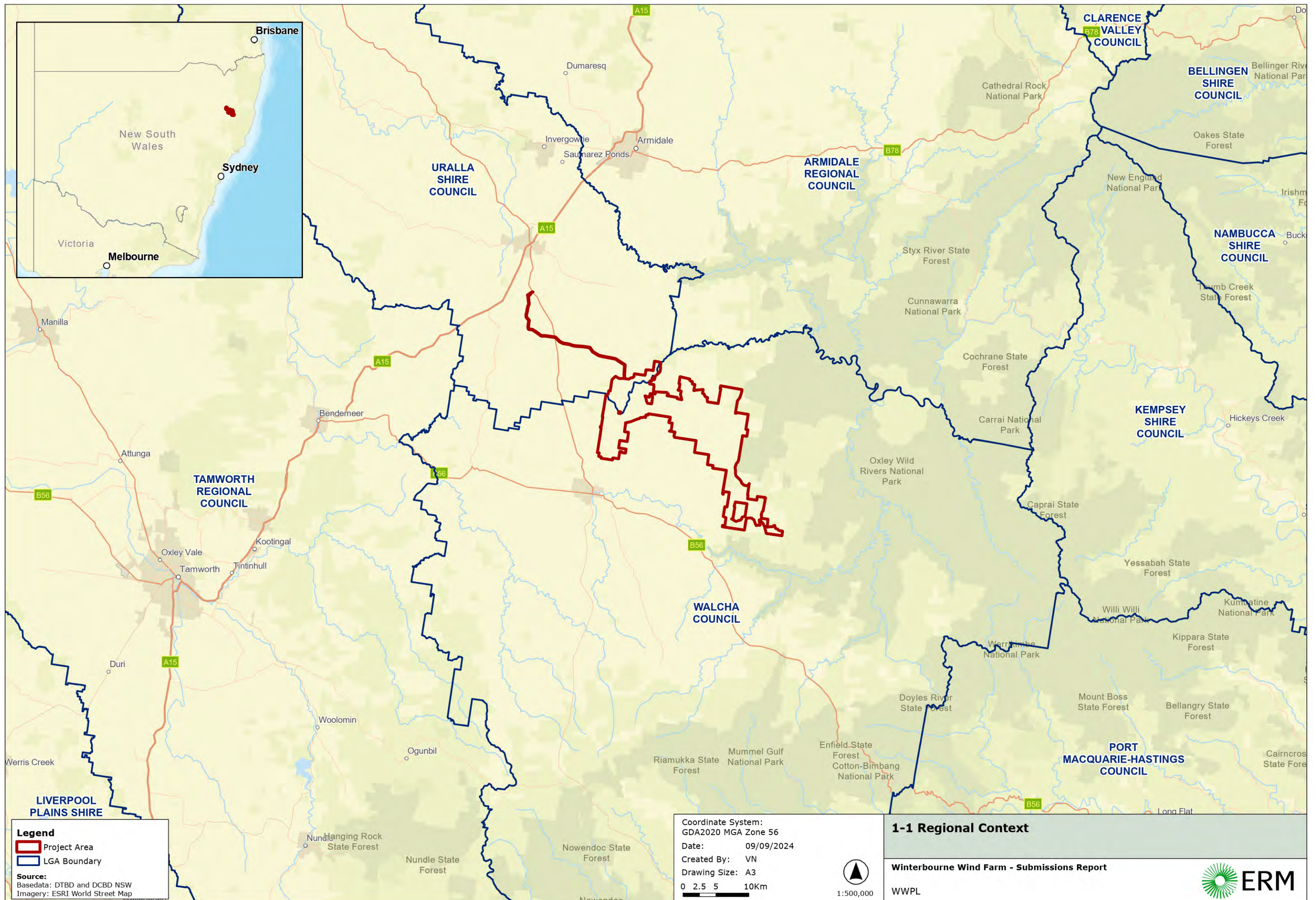
TABLE 1-1 AMENDED PROJECT SUMMARY

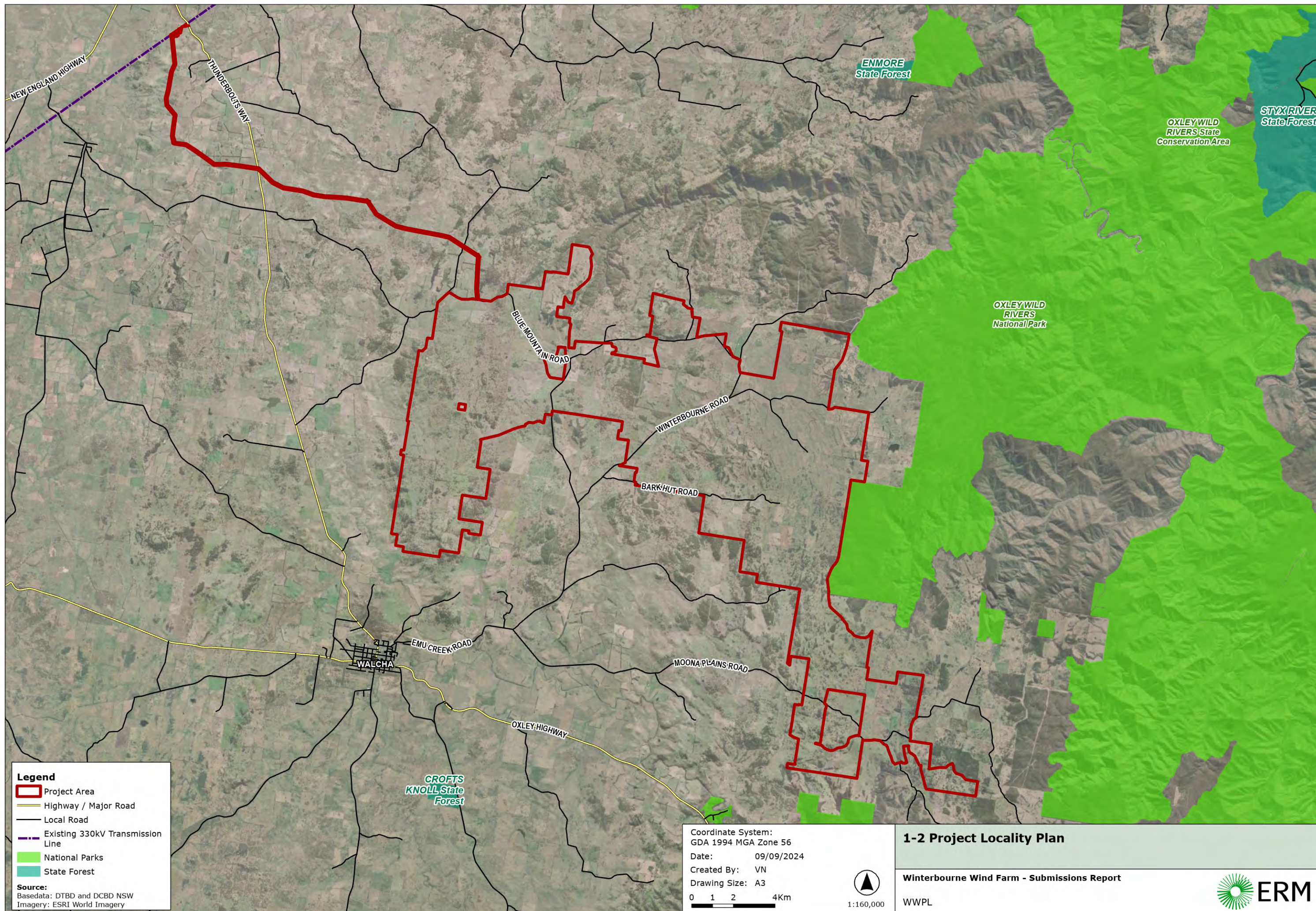
Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
Project Area	22,285 ha	21,603 ha (excl. TL) 21,844 ha (incl. TL)	Negligible (1% decrease)
Permanent disturbance Footprint	474.2 ha	216.6 ha	Decrease of 257.6 ha (54%)
Temporary disturbance footprint	107.2 ha (in addition to permanent disturbance footprint)	697.02 ha	Increase of 589.82 ha (550%)
WTG number / dimensions (maximum)	- Up to 119 230 m tip height 149 m hub height	- Up to 118 230 tip height 149 m hub height	- Reduction of 1 WTG - No change in tip height - No change in hub height
Met mast number	4x temporary 2x permanent	3x temporary 2x permanent	- Reduction of 1 temporary met mast - No change in permanent met masts
Indicative WTG Model	V162-6.2 MW	V162-6.2 MW	No change
Electrical reticulation	2 x 33/330 kV substations	2 x 33/330 kV substations	No change
	324 km of internal 33 kV electrical reticulation network, underground and overhead	210.5 km of internal 33 kV electrical reticulation network, comprising 25.6 km overhead and 184.9 km underground	Decrease of 113.5 km (35%)
	50 km of 330 kV overhead transmission line to connect the Project to the existing transmission network	44 km of 330 kV overhead transmission line to connect the Project to the existing transmission network	Decrease in overhead 330 kV transmission line length by 6 km
BESS	100 MW / 200 MWh lithium-ion battery (indicative)	100 MW / 200 MWh lithium-ion battery (indicative)	No change

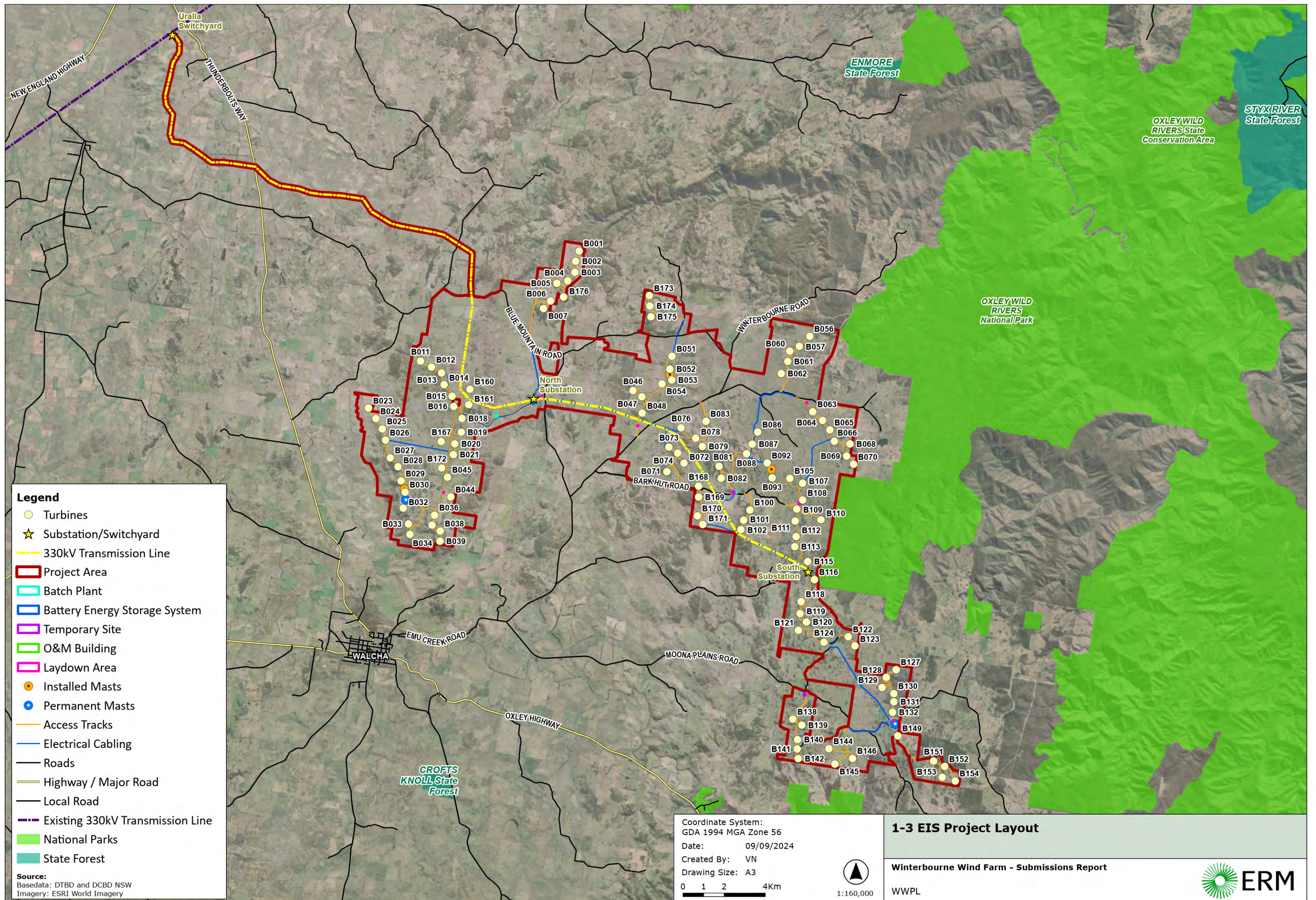
Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
New internal access tracks	- Approx. 15 m wide formation including 5.5 m roadway plus shoulders and drainage as required 113 km total length	- Approx. 15 m wide formation including 5.5 m roadway plus shoulders and drainage as required 115.3 km total length	Increase of 2.3 km (2%)
Construction			
Construction Duration	Approximately 30 months	Approximately 52 months	Expected increase in duration of construction by 22 months
Construction Workforce	Up to 400 FTE	Up to 390 FTE	Reduction of 10 FTE workforce
On-site Temporary Infrastructure	Concrete batching plants (up to 3), laydown areas (up to 8), site office, including parking etc. (up to 3)	Concrete batching plants (up to 3), laydown areas (up to 14), site office, including parking etc. (up to 3)	Increase of 6 potential contractor laydown areas
Ancillary Activities	- Import of external gravel, aggregate and sand to site for on-site construction use - Import water to site for onsite construction use	- Onsite quarry to supply gravel and potentially aggregate and bedding material for construction purposes - Onsite water supply from new groundwater bores	- Construction materials including gravel and potentially aggregate and bedding material sourced onsite - Water for construction purposes sourced onsite where possible (water for concrete batching subject to quality testing)
Transport Route	- Via Port of Newcastle - OSOM vehicle movements via Oxley Highway - Associated external road upgrades (also used for operational maintenance or decommissioning activities)	- Via Port of Newcastle - Inbound OSOM vehicle movements via new road to be constructed south of Uralla - Associated external road upgrades (also used for operational maintenance or decommissioning activities)	Avoidance of Oxley Highway for inbound OSOM vehicle movements and instead via the newly constructed road

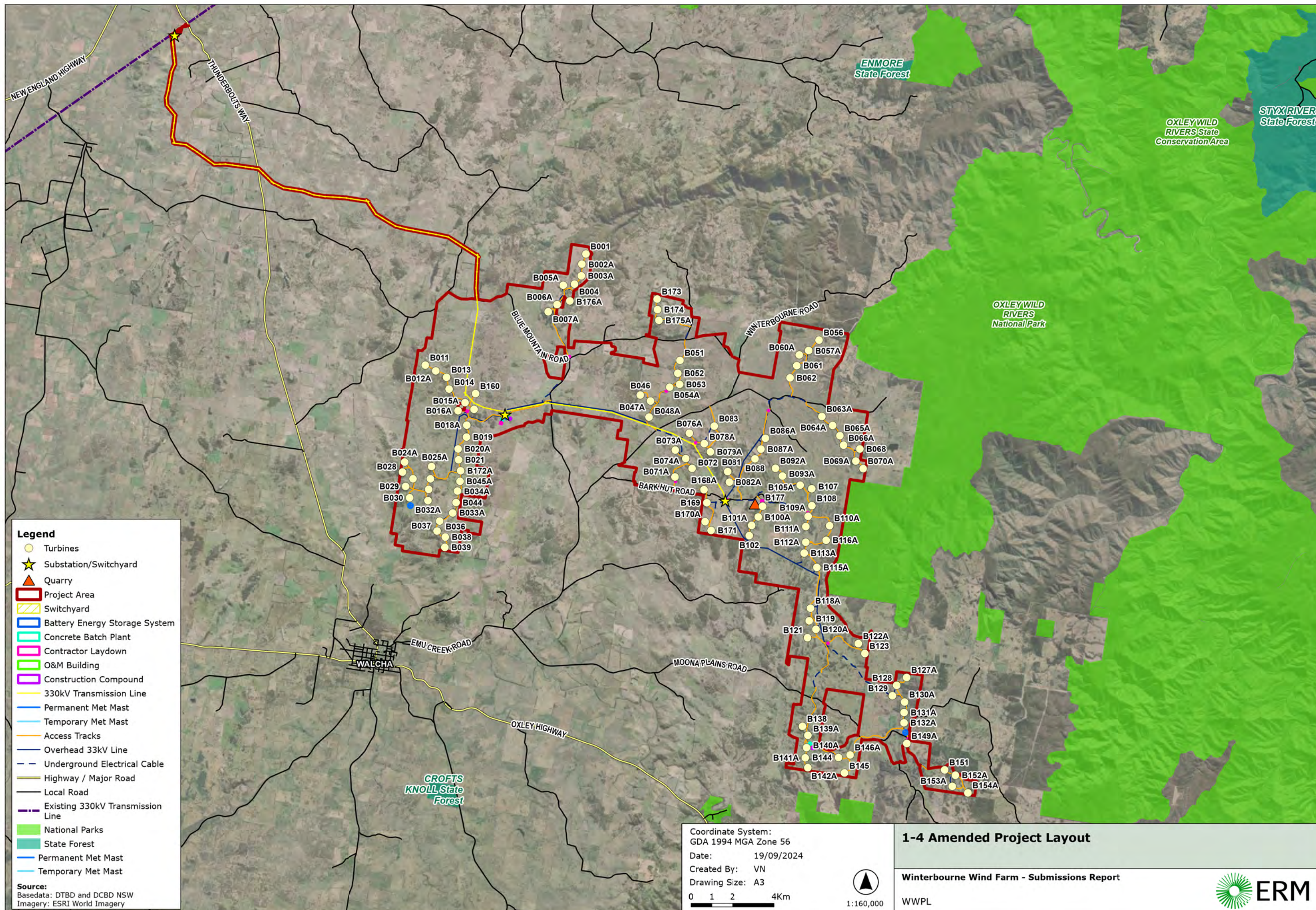
Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
Operation			
Operational Workforce	Up to 39 FTE	Up to 16 FTE	Reduction of 23 FTE
Operational Duration	30 years	30 years	No change
Impacts			
EPBC Act listed entities (SAII entities)	- Clearing of New England Peppermint Grassy Woodlands (SAII entity), comprising: 11.1 ha of woody vegetation within the Disturbance Footprint 3.32 ha of non-woody moderate condition grassland within the Disturbance Footprint	- Clearing of New England Peppermint Grassy Woodlands, comprising: 2.68 ha of woody vegetation within the Disturbance Footprint 13.70 ha of non-woody moderate condition grassland within the Disturbance Footprint 3.75 ha of woody vegetation within the local road reserve - No non-woody moderate condition grassland within local road reserve	- Overall decrease in impacts to New England Peppermint Grassy Woodlands woody vegetation by 42% - Decrease in impacts to New England Peppermint Grassy Woodlands woody vegetation within the Disturbance Footprint by 76%
	- Clearing of White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (SAII entity), comprising: 42.9 ha of woody vegetation within the Disturbance Footprint 106 ha of non-woody moderate condition grassland within the Disturbance Footprint	- Clearing of White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland: 3.26 ha of woody vegetation within the Disturbance Footprint 13.22 ha of non-woody moderate condition grassland within the Disturbance Footprint 1.35 ha of woody vegetation within the local road reserve 5.47 ha of non-woody moderate condition grassland within local road reserve	- Overall decrease in impacts to White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland woody vegetation by 89% - Decrease in impacts to White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland woody vegetation within the Disturbance Footprint by 92% - Overall decrease in impacts to White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland vegetation (both woody and derived native grassland forms) by 84%

Project Elements	EIS (original) Project	Amended Project	Difference between EIS and Amended Project
	Clearing of 426 ha of potential habitat for the Spotted-tail Quoll	Clearing of 128 ha of potential habitat for the Spotted-tail Quoll	Reduction in impacts to potential habitat for the Spotted-tail Quoll by 70%
	Clearing of 206.9 ha of potential habitat for the Koala	Clearing of 122.9 ha of potential habitat for the Koala	Reduction in impacts to potential habitat for the Koala by 41%
Visual Impact	- Visual magnitude: 20 dwellings within the black line (3,100 m); 23 dwellings within the blue line (4,550 m); - Multiple wind turbine tool: 25 dwellings with potential views in up to 2 60-degree sectors; 11 dwellings with potential views in up to 3 60-degree sectors; 1 dwelling with potential views in up to 4 60-degree sectors; - Visual impact rating: 12 non-associated dwellings with potential for moderate visual impacts; and - Five non-associated dwellings with potential for high visual impact.	- Visual magnitude: 17 dwellings within the black line (3,100 m); 21 dwellings within the blue line (4,550 m); - Multiple wind turbine tool: 19 dwellings with potential views in up to 2 60-degree sectors; 8 dwellings with potential views in up to 3 60-degree sectors; 1 dwelling with potential views in up to 4 60-degree sectors; - Visual impact rating: 13 non-associated dwellings with potential for moderate visual impacts; and - No non-associated dwellings with potential for high visual impact.	- Visual magnitude: - Dwellings within black line of visual magnitude reduced by 3; - Dwellings within blue line of visual magnitude reduced by 2; - Multiple wind turbine tool: - Dwellings with potential views in up to 2 60-degree sectors reduced by 6; - Dwellings with potential views in up to 3 60-degree sectors reduced by 3; - Visual impact rating: - Dwellings with potential moderate visual impact increased by one; and - Dwellings with potential high visual impact decreased by five, such that there are no high visual impact dwellings remaining.









2. ANALYSIS OF SUBMISSIONS

2.1 NUMBER OF SUBMISSIONS

A total of 959 submissions relating to the Project EIS were during the exhibition period. These submissions are available on the DPHI Major Projects website and are categorised as follows:

- 924 public submissions (excluding duplicates);
- 14 organisation submissions;
- 4 local council submissions; and
- 17 submissions with advice from government agencies.

All submissions received have been recorded in the Submissions Register (refer **Appendix A**). Four submissions were received after the formal exhibition period and were considered within this Submissions Report.

A breakdown of the submissions by type (i.e., support, object, comment) is detailed in **Table 2-1**.

TABLE 2-1 NUMBER OF SUBMISSIONS RECEIVED

Type	Object	Support	Comment	Total
Public	428	488	8	924
Organisation	6	5	3	14
Local council	2	0	2	4
Agency advice	-	-	17	17
TOTAL	436	493	30	959

Fourteen (14) submissions were received from organisations, including from:

- ReD4NE (Responsible Energy Development for New England);
- Save Our Surroundings;
- Save Our Woodlands;
- Hills of Gold Preservation Inc.;
- Uralla Walcha Renewable Energy Action Group;
- Voice for Walcha;
- Citizens Climate Lobby;
- Farmers for Climate Action;
- Ryde Gladesville Climate Action Energy Group;
- Uarbry Tongy Lane Alliance Inc.;
- Walcha Energy;
- RE-Alliance;
- Armidale Branch of the National Parks Association of NSW; and
- Hastings Birdwatchers.

Four (4) submissions were received from councils, including from:

- City of Newcastle Council;
- Muswellbrook Shire Council;
- Uralla Shire Council; and
- Walcha Council.

Seventeen (17) submissions were from State and Australian Government agencies including from:

- Airservices Australia;
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Biodiversity and Conservation Division (BCD) (now Biodiversity Conservation and Science Directorate (BCS));
- Crown Lands;
- Civil Aviation Safety Authority (CASA);
- Department of Primary Industries (DPI) Agriculture;
- DPI Fisheries;
- DPE (now NSW DCCEEW) Water;
- Department of Regional NSW – Mining, Exploration and Geoscience (MEG);
- Fire and Rescue NSW (FRNSW);
- Rural Fire Service;
- Heritage NSW;
- Heritage NSW – Aboriginal;
- NSW Environment Protection Authority (EPA);
- NSW Telco Authority;
- TransGrid;
- Transport for NSW (TfNSW); and
- Water NSW.

2.2 GEOGRAPHIC ANALYSIS

In accordance with the *State significant development guidelines – preparing a submissions report* (DPHI, 2024), this section geographically categorises the submissions according to the level of local (<5 km from the site), regional (5-100 km from the site) and broader community (>100 km from the site) interest in the Project.

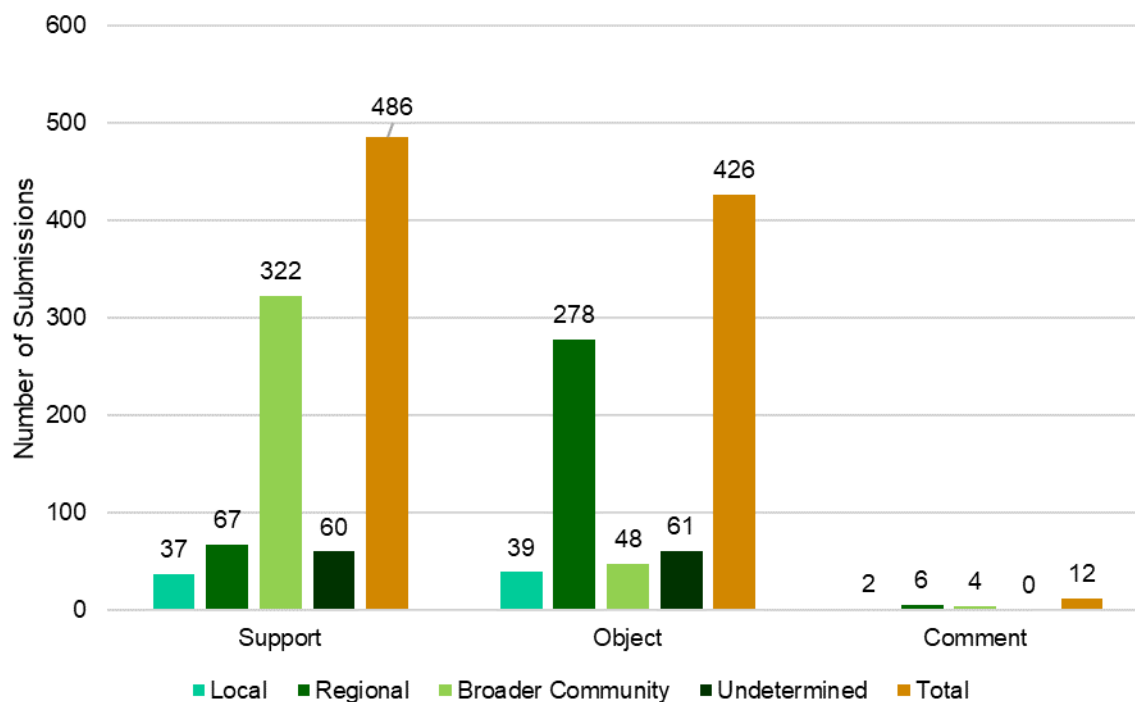
Of the 924 submissions received from members of the public:

- 78 (8%) were local (<5 km from the site), comprising 37 in support, 39 in objection and 2 with comment only;
- 351 (38%) were regional (5-100 km from the site), comprising 73 in support and 278 in objection;

- 374 (41%) were categorised as broader community interest (>100 km from the site) comprising 322 in support and 52 in objection; and
- 121 (13%) submissions did not identify the author's name or address and have been categorised as undetermined, comprising 60 submissions in support and 61 submissions in objection.

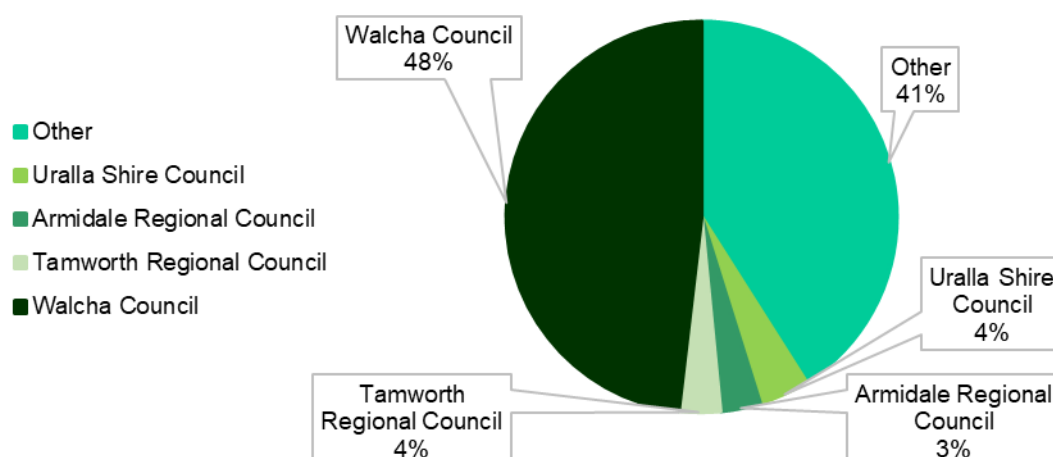
Figure 2-1 and **Figure 2-2** illustrate the geographic distribution of public submissions by distance to the Project and by local government area (LGA).

FIGURE 2-1 SUBMISSION ANALYSIS BY DISTANCE FROM PROJECT AREA



On balance, 488 public submissions were in support of the Project, while 428 public submissions were in objection of the Project, and 8 public submissions provided comments only. A significant number of the submissions in support of the Project were from the broader community. Most submissions which objected to the Project were regional, while local submissions were almost evenly split. Overall, 59% of the total submissions were received from LGAs that are located within 100 km of the Project (i.e., Walcha LGA, Uralla Shire LGA, Armidale Regional LGA and Tamworth Regional LGA).

FIGURE 2-2 ANALYSIS OF SUBMISSIONS BY LGA



2.3 SUBMISSION CATEGORISATION

Each submission received was reviewed and the key themes categorised as summarised below in **Table 2-2**. Once submissions were assigned to those categories, they were categorised further into relevant sub-categories aligning with economic, environmental and social aspects to avoid oversimplifying or misrepresenting any of the issues.

TABLE 2-2 CATEGORIES OF ASPECTS RAISED IN SUBMISSIONS

Category	Description
The Project	The site, Project Area, physical layout and design, key uses and activities, timing
Procedural matters	The level or quality of engagement, compliance with the SEARs, identification of relevant statutory requirements
Economic, environmental and social impacts	Biodiversity, noise and vibration, landscape and visual, transport and traffic, social and economic, aviation, bushfire, BESS hazards, human health / blade throw, heritage, agriculture, soil and water, flooding, air quality, waste and cumulative impacts
Justification and evaluation	Consistency of Project with Government plans, policies or guidelines
Issues beyond scope of Project	Broader policy issues or not relevant to the Project

A breakdown of the key matters raised by councils, government agencies and in supporting and objecting submissions from members of the public is displayed in **Sections 2.3.1, 2.3.2** and **2.3.3** respectively.

2.3.1 COUNCIL AND GOVERNMENT AGENCY SUBMISSIONS

A total of 17 submissions from councils and government agencies were received. A summary of the key matters raised in the council and government agency submissions is provided below in **Table 2-5**.

TABLE 2-3 SUMMARY OF KEY MATTERS RAISED IN COUNCIL AND GOVERNMENT AGENCY SUBMISSIONS

Theme	Matter raised
The Project	Mitigation measures are not clearly defined
	Decommissioning of the Project
Procedural matters	Voluntary planning agreements and community benefits
	Limited information regarding neighbour benefits
Justification and evaluation	-
Issues beyond Project scope	-
Economic, environmental and social impacts	Refer to responses in Table 2-4

TABLE 2-4 SUMMARY OF KEY ENVIRONMENTAL, ECONOMIC AND SOCIAL MATTERS RAISED BY COUNCIL AND AGENCY SUBMISSIONS

Theme	Description
Biodiversity	Impacts along the haul route
	Insufficient survey effort
	Bird and bat impact
	Avoidance and mitigation measures
Noise and Vibration	Construction traffic noise impacts along haul routes
Visual	Consideration of agricultural landscape
	Negative impact on visual amenity
Transport	Road upgrades along haul routes
	Rail corridor impacts
	Road degradation and dilapidation
	Road safety
Social and Economic	Workforce accommodation
Hazards	Safety concerns regarding fires associated with the BESS
Agriculture	Decommissioning
Bushfire	Impacts to the National Park
Heritage	Consultation with Registered Aboriginal Party's (RAPs)
	Impacts to cultural heritage values within the Project Area
Soil and Water	Impacts of erosion and sedimentation
	Water resources and availability
Air Quality	Air quality impacts from dust or vehicle emissions
Aviation	Aviation hazards associated with turbine lighting

Theme	Description
Electromagnetic interference (EMI)	Impacts to communication links across the Project Area
Waste	Transportation of waste on local roads
Cumulative Impacts	Traffic impacts throughout the road network from Newcastle to the Project Area

2.3.2 COMMUNITY SUPPORT

A total of 488 (53%) public submissions were in support of the Project. A summary of the key matters raised in the public and community submissions in support of the Project is provided below in **Table 2-5** and **Figure 2-3**.

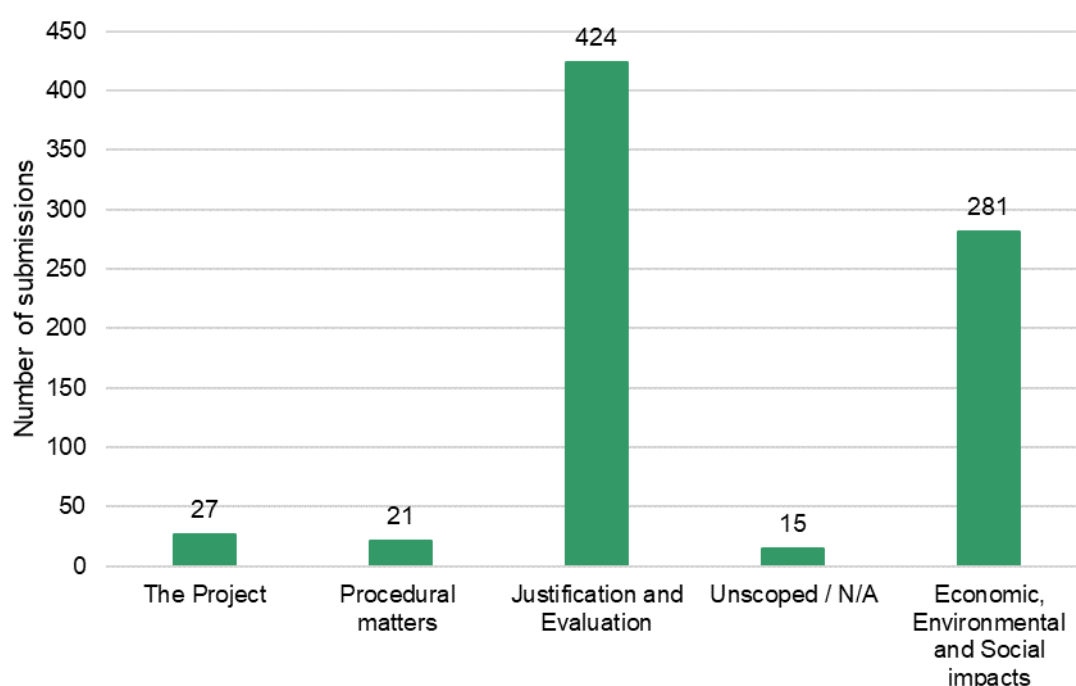
TABLE 2-5 SUMMARY OF KEY MATTERS RAISED IN SUPPORT PUBLIC SUBMISSIONS

Theme	Matter raised
The Project	Impacts have been assessed and appropriately mitigated
	Turbines are mostly sited on unproductive land
	Decommissioning will be managed and has been considered
	Site is close to transmission lines and power grid
	The Northern Tablelands region has lots of wind
Procedural matters	The Applicant has developed a code of conduct to protect the community
	Long, widely canvassed and effective community consultation has been conducted
	Community Consultation Plan provides the opportunity for all voices to be recognised
	Abundant public information available in the Applicant's office
	Developers have listened to the community feedback to meet local aspirations
Justification and evaluation	Increased energy security and reduced reliance on fossil fuels
	Provide a cleaner and more affordable alternative energy supply
	Help to meet NSW Net Zero Emissions target through renewable energy solution
	Improved air quality and environment
	Benefits outweigh the short-term cost
Issues beyond Project scope	Belief that Vestas Wind Systems A/S (Vestas) is a responsible wind energy company and will consult with landholders about decarbonisation opportunities
Economic, environmental and social impacts	Key impacts within this category were primarily related to the positive social and economic impacts for the Walcha community, and the diversification of income for host landowners to support continued agricultural operations. These themes are further presented in Table 2-6 .

Of the 488 public submissions in support of the Project, the major themes were that:

- The Project would assist NSW and Australia transition to an alternative, low-carbon energy supply using renewable resources, and in turn minimise the impacts of climate change;
- The location of the Project was well selected in proximity to existing transmission infrastructure and in an area that has excellent wind resource;
- The Project stakeholder consultation process was inclusive and informative, with ample information made available for individuals interested in learning more about the Project;
- The developer was a responsible company that had generated trust within the community through the development and implementation of a Community Consultation Plan; and
- Feedback from the consultation sessions was incorporated into the Project design.

FIGURE 2-3 BROAD THEMES OF SUPPORT PUBLIC SUBMISSIONS



The environmental, social and economic impact submissions had more layers than the other submission categories. Accordingly, the key environmental, social and economic issues raised in submissions of support were further broken down relevant to the potential impacts that were assessed within the EIS. A summary of these is presented in **Table 2-6** and **Figure 2-3**.

TABLE 2-6 ECONOMIC, SOCIAL AND ENVIRONMENTAL SUPPORT PUBLIC SUBMISSIONS SUMMARY

Theme	Description
Biodiversity	Placement of the turbines does not impede stakeholder revegetation goals
Noise and Vibration	Noise impact has not been noticed when working around other wind farms
Visual	Wind turbines will have a positive or neutral impact on visual amenity
Transport	Upgrade of roads for transport routes will be beneficial for the community

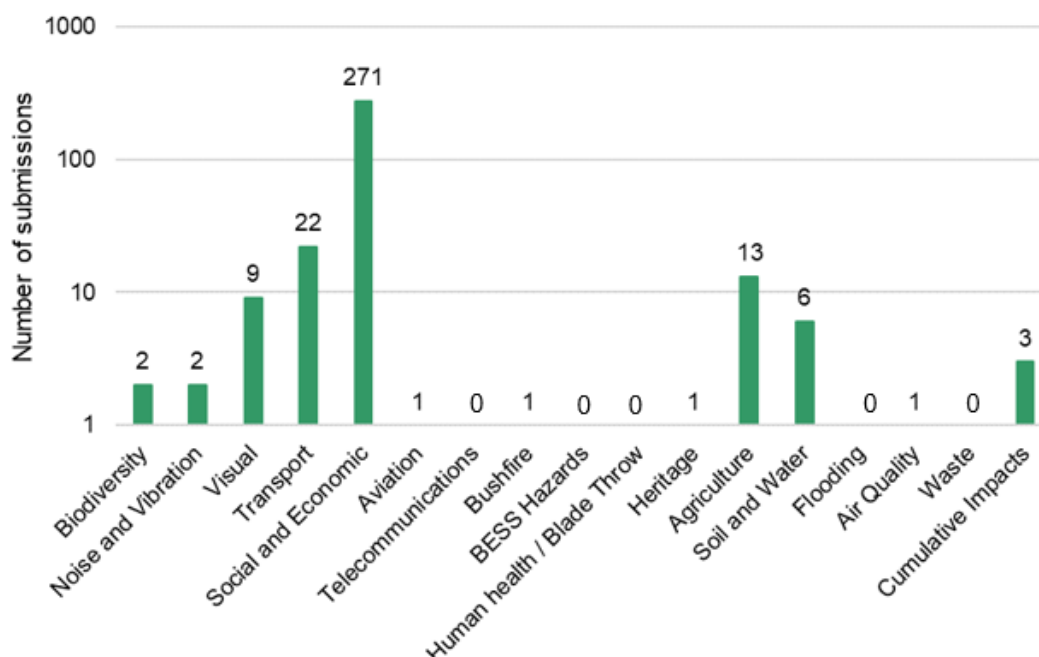
Theme	Description
Social and Economic	The Project will maintain population growth by providing more diverse job opportunities and increased skills for future employment or industry
	Provide capital for on-going local development and businesses
	Community benefit funding will have a positive economic impact for Walcha and Uralla Shire LGAs
	Host farmers will have increased income for drought resilience and to spend at businesses in the area
	Help to avoid council amalgamation
	Active community opposition creating social pressure
Bushfire	Development of access roads and local road upgrades will improve conditions for firefighters
Agriculture	Diversification of income for landowners
	Greater ability to fight noxious weeds and pests from improved access
	Will not impact farming operations
Soil and Water	Will not impact groundwater
	Turbines are spread out on less productive land
	Reduces contamination of water and soil
Air Quality	Reduces pollution from fossil fuels
Cumulative Impacts	All impacts have been considered and adequately mitigated

Submissions in support of the Project generally highlighted the social and economic benefits associated with both the construction and operation of the Project, including:

- Annual revenue for landowners is believed to help stimulate the local economy and businesses;
- The establishment of a community benefit fund (CBF) supporting projects and programs that would benefit the local region;
- The increased revenue and job opportunities that are linked to the wind farm are perceived to provide opportunities for the local youth to gain employment and upskill such that they can remain within Walcha or the local area; and
- Local road upgrades providing benefits for residents, improved access for landowners and the ability for emergency services to fight bushfires within the area.

A breakdown of the total submissions for each category is included in **Figure 2-4**.

FIGURE 2-4 ENVIRONMENTAL, ECONOMIC AND SOCIAL ASPECTS RAISED IN PUBLIC SUBMISSIONS IN SUPPORT OF THE PROJECT



2.3.3 COMMUNITY OBJECTIONS

A summary of the key matters raised in public and community submissions in objection to the Project is provided in **Table 2-7**.

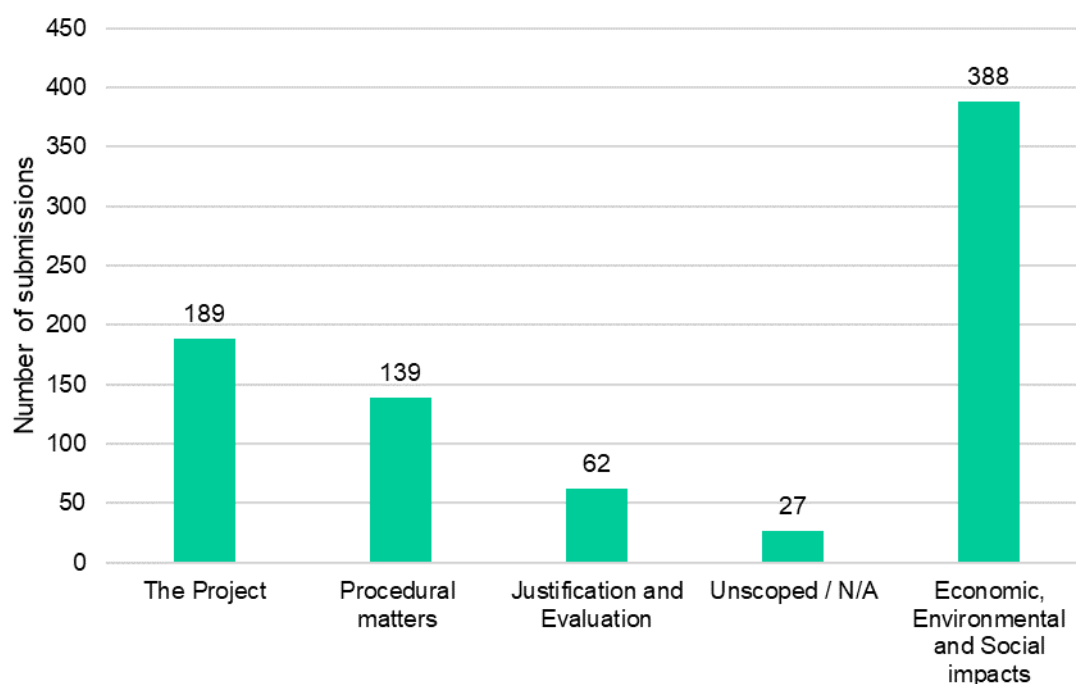
TABLE 2-7 SUMMARY OF KEY MATTERS RAISED IN OBJECTION PUBLIC SUBMISSIONS

Theme	Description
The Project	Majority of profits are going offshore (international company)
	Inappropriate turbine siting
	Lack of detail, legislation or clear funding about the decommissioning of wind turbines at the end of Project life
	The Project is too large in relation to population density and resources within the area
Procedural matters	Lack of transparency with consultation between landowners and the rest of the public
	Drop-in community consultation method was not effective or up to standard
	Communication breakdowns with the community benefit funding and neighbour benefit fund
	Community benefit funding is insufficient compared to overall revenue and impact to community
	Inaccurate information in EIS

Theme	Description
Justification and evaluation	Needs to be more in line with the Council concerns, will cause grid instability and increase power costs
	Temporary and resource intensive materials
Issues beyond Project scope	Insufficient land use planning
	Other forms of renewable energy have a lower carbon footprint
	Wind energy is unable to provide baseload power
	Wind energy is outdated and has a large footprint. Alternative energy types such as nuclear could be more beneficial
	Renewable energy should be developed closer to the state's large population centres where there is higher demand for electricity
Economic, environmental and social impacts	As majority of the objection submissions (92%) included reference to social, economic and environmental impacts to the Project, these issues are discussed further in Section 5 .

A total of 428 (47%) public submissions were raised in objection to the Project. Many of these opposed the location of the New England Renewable Energy Zone (REZ), arguing that renewable energy should be developed closer to the state's large populations centres where there is higher demand for electricity. Many also suggested alternate energy generation technologies, such as nuclear, should be considered rather than developing wind farms.

FIGURE 2-5 BROAD THEMES OF OBJECTION PUBLIC SUBMISSIONS



The majority (278) of objecting public submissions were from the region (5-100 km from the site), while 39 were received from the local area, 48 from the broader community, and 61 did not disclose their location. The main themes of the objections raised in this context related to:

- The location of the Project relative to the Oxley Wild Rivers National Park and World Heritage Area;
- Perceived impact to the general high quality (prime) agricultural land within the Walcha region, including the land on which the Project is proposed;
- Proximity of the Project to the Walcha township;
- The town's economy and community culture would be unable to withstand the impacts of itinerant workers; and
- Increased prices for goods and services (including rent) for the local community.

Key themes from social, economic and environmental aspects of the Project are presented in **Table 2-8**.

TABLE 2-8 ECONOMIC, SOCIAL AND ENVIRONMENTAL OBJECTION SUBMISSIONS SUMMARY

Theme	Description
Biodiversity	Likely impacts to threatened species (flora and fauna) associated with the Oxley Rivers National Park
	Negative impact to biodiversity due to Project proximity to a World Heritage Area
	Significant impact to birds and bats with little mitigation measures provided
	Disruptions and clearing of natural habitat will cause further extinction of endangered species
	The proposed biodiversity offset does not outweigh the loss of the World Heritage National Park
Noise and Vibration	Significant noise pollution to neighbours
	Lack of transparency surrounding results from noise monitoring provided to neighbours
	Impacts from infrasound
Visual	Reduced visual amenity for tourists and residents
	Neighbours will be unfairly impacted
	Red lights on turbines at night are a form of visual pollution that may impact sleep
	Visual surveys had a lack of transparency
Transport	Delivery of turbine components will cause significant traffic congestion to local residents
	Safety of local road users (both drivers and pedestrians) using the road due to increased traffic and road degradation
	Impact to the road condition from OSOM use and construction workers following road upgrades
	Emergency services will be negatively impacted by road congestion

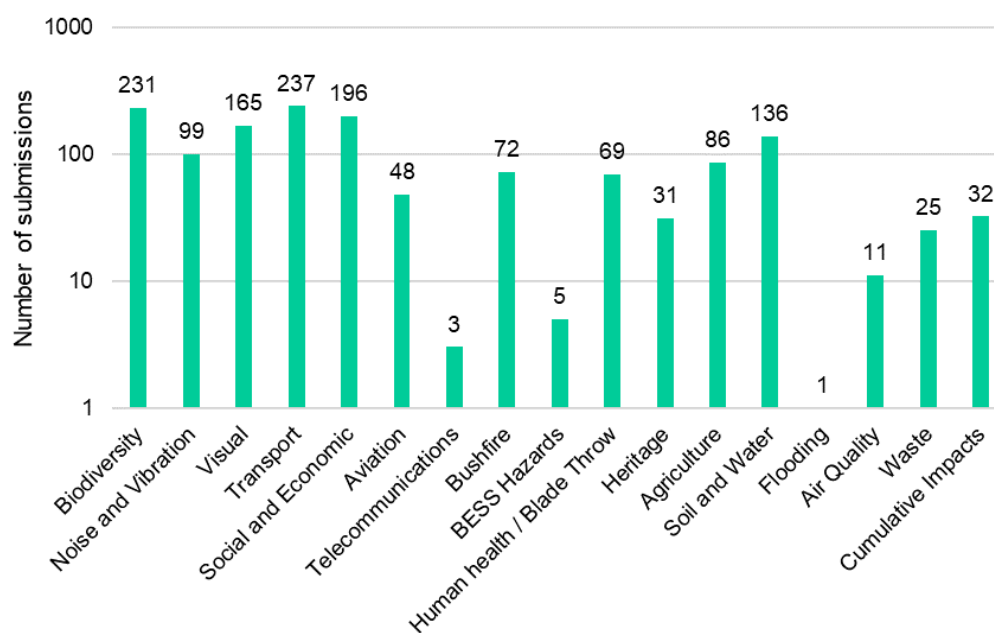
Theme	Description
Social and Economic	No long-term economic gain from the Project, and the Project will ultimately damage the long-term economic outlook of Walcha
	Increase in cost of rent if construction workers try to stay in town
	Disruption to the local community culture (has caused a divide in town)
	Devaluation of surrounding properties
	Reduction in tourism due to reduced visual amenity of the area
	Increased cost of contractors if Walcha workers are used during construction phase
	Only associated farmers with direct funding will benefit, other farmers will be impacted by increased costs of goods and services
	Lack of local workforce to work on other developments if the workers are used for the Project
Bushfire	Water required for the Project may reduce the water available for firefighting (particularly for water bombing in the National Park)
	Increased risk of fires due to reduced aerial firefighting capability
Aviation	Use of muted colours on turbines a hazard for local pilots
	Concerns about impacts to medical helicopters when flying at high altitude and their ability to access Walcha
	Lack of consultation with ALA owners and operators
Agriculture	Significant impact to use of local neighbouring farm airstrips, resulting in lack of weed control and fertiliser application
	Biosecurity risk from increased workers and sedimentation run-off
	Reduced productivity due to stress of animals on neighbouring farms
	Reduce the productivity of prime agricultural land
Soil and Water	Clearing of trees will cause significant erosion and sedimentation run-off
	Quantities of required soil and water not accurately displayed or calculated in the EIS
	Insufficient water in the region to support the development
	BPA resin from turbine components may contaminate water and soils
	Insufficient supply of local aggregate to support the development of the Project
Air Quality	Dust impacts from construction not adequately addressed
Heritage	First Nations people were not adequately consulted
BESS Hazards	Increased risk of fire associated with a BESS
Human Health	Wind farms can have significant health impacts from Bisphenol A (BPA) shedding and electromagnetic fields

Theme	Description
Waste	A waste management plan has not been provided as part of the EIS
	No consideration of wind turbine disposal at end of life (belief that it will go to landfill)
	New England is a waste levied area, with no discussions recorded with landfills in Armidale and Tamworth
Cumulative Impacts	Impacts from the REZ not adequately addressed, with some developments not included

Submissions in objection to the Project generally highlighted a wide range of issues associated with the construction and operation of the Project. The objections that were raised through submissions are addressed in **Section 5**.

A breakdown of the total objecting submissions received from the public and the community for each sub-category is included in **Figure 2-6**.

FIGURE 2-6 ECONOMIC, SOCIAL AND ENVIRONMENTAL ASPECTS RAISED IN PUBLIC SUBMISSIONS IN OBJECTION TO THE PROJECT



3. ACTIONS TAKEN SINCE EXHIBITION

Since lodging the EIS in October 2022 and the subsequent public exhibition period, the Applicant has continued to engage with the community, organisations, local councils and local, State and federal government agencies. The Applicant has also commissioned additional assessments and surveys and progressed Project design in response to agency advice and public submissions received, and constructability considerations.

3.1 ENGAGEMENT

3.1.1 COMMUNITY AND STAKEHOLDER ENGAGEMENT

Since the lodgement of the EIS in October 2022, the Applicant has continued to engage with and seek feedback from the community and other stakeholders as detailed in **Table 3-1** below.

TABLE 3-1 COMMUNITY AND STAKEHOLDER ENGAGEMENT OVERVIEW

Engagement Activity	Description
EIS Information Days	The Applicant hosted a community information event over two days in December 2022 at the Walcha Bowling Club to provide information about the Project and key findings of the EIS. The Project team spoke with community members and provided information on poster boards and handouts to describe the results of key environmental assessments and provide information about the community benefit funding and the types of jobs and skills required for the Project.
Walcha Show 2023 and 2024	The Applicant provided a booth over two days at the Walcha Show in March 2023 and March 2024. The Project team spoke with many members of the community who stopped by to learn more about the Project and read information presented on poster boards about the Project layout, expected timeline, and the CBF. Questions were answered about wind technology, planning approval processes and construction issues, and ideas were received about how the CBF could be used in the local area.
Uralla Street Stall	The Applicant hosted a street stall in Uralla on 3 May 2024 to share information about the proposed Project with the Uralla community. The Project team spoke with Uralla locals and presented poster boards about the Project layout, the development timeline, the transport route and the CBF.
CBF Community Survey	A survey was distributed between April - May 2023 to ask the Walcha and Uralla community to rank their preferences for use of the CBF across a range of options, and to identify specific community groups or community needs which could be supported through the fund. The survey received 62 responses which indicated a preference for the CBF to be spent on upgrading local parks and sporting facilities, creating new community infrastructure, providing skills training and youth scholarships, and supporting local programs and events. In addition, the community identified more than 40 specific sporting clubs, community groups, health services, education services, environmental initiatives and general concepts which could benefit from funding provided by the Project.

Engagement Activity	Description
Face-to-face Meetings	Twelve (12) local businesses in Walcha were visited on 18 January 2023. Business owners were informed about the exhibition period and the closing date for submissions. A guide to making submissions was distributed. Most of the businesses visited indicated support for the Project. The Applicant has also met with and provided briefings to several local, regional and state stakeholders.
Newsletter Updates	The Applicant has continued to provide periodic newsletter updates about the Project, with the latest updates provided in February 2024, April 2024 and July 2024. The February 2024 update outlined the status of the Project and the next steps in the planning process and outlined the community benefit funding. The April 2024 update provided an update on the expected Project permitting timeline and information about the proposed new oversize and overmass transport route. The July 2024 provided information about the Voluntary Planning Agreement and the proposed onsite quarry. The Project updates are distributed via Post and an email subscriber list and are also downloadable from the Project website: www.winterbournewindfarm.com.au/downloads/. The email subscriber list reaches an audience of approximately 250 people as of 1 July 2024.
Project Office	The Project Office in Walcha was open to the public for 60 days across 8 months in 2023. This provided opportunities for community members, landholders and potential suppliers to visit the office and discuss the Project with a member of the Project team. There were 26 visits to the office over the 60 days by people making enquiries about the Project. When the office was not attended, a sign was provided on the office door to direct the public to our contact number and information-email to ensure there was always an avenue for the public to contact the Project Team. The office was re-opened in June 2024 and is occupied three days per week.
Direct Communication Channels	The Project contact number, Project email, and postal address has continued to be operational and monitored since its establishment during preparation of the EIS. Since the EIS Exhibition, there have been 54 calls to the contact number and 255 engagements via email, meeting, phone and SMS that have been received and addressed by the Project team.

3.1.2 REGULATOR ENGAGEMENT

Several state and Commonwealth regulatory agencies have been consulted regarding the proposed responses to submissions, including:

TABLE 3-2 AGENCY ENGAGEMENT SUMMARY SINCE EXHIBITION

Engagement Activity	Description
DPE (now DPHI)	
Meetings, emails and phone conversations held on: • 24, 25 and 31 January 2023; • 2 February 2023; • 7 and 21 March 2023; • 1 and 23 May 2023; • 14 and 21 September 2023; • 17, 27 and 31 October 2023; • 1, 11 and 15 November 2023; • 7 and 12 December 2023; • 18 and 30 January 2024; • 26 February 2024; and • 15 August 2024.	• Discussed DPHI requirements and expectations regarding submissions from several agencies (TfNSW, RFS, BCS and Councils) and outlined proposed refinements to the Project in response to submissions received and the need for an Amendment Report and Project submission timeline; • Submissions raised relating to the Preliminary Hazard Analysis (Sherpa Consulting, 4 April 2022) (PHA) were addressed in October 2023 via email and included a memorandum to DPE (now DPHI) justifying the approach undertaken for the PHA in response to the specific submission raised; • Additional issues raised by DPE (now DPHI) relating to transport and traffic impacts via emails in October and November 2023; • Additional issues raised by DPE (now DPHI) relating to landscape and visual impacts via emails in November and December 2023; • Briefing in respect of proposed onsite quarry in January and February 2024; and • On 15 August 2024, the Applicant discussed outcomes of actions taken during response to submissions phase, finalisation and submissions of Submissions Report, Amendment Report and associated supporting documentation.
BCS	
• Meetings, emails and phone conversations held on: • 13, 15 April 2023; • 4, 11, 12 May 2023; • 27 June 2023; • 2, 15, 17 August 2023; and • 16 August 2024.	• The Applicant engaged with BCS in April 2023 to discuss native vegetation regulatory mapping, data licencing and relevant spatial layers for incorporation into the land category assessment and vegetation mapping. These data layers were provided to the Applicant in late April; • The Applicant engaged with BCS in May and August 2023 to discuss survey requirements for bird and bat species; • The Applicant engaged with BCS in June and August 2023 to discuss threatened species survey requirements in generally, and specifically for the Eastern pygmy possum; and • The Applicant engaged with BCS in August 2024 to provide an overview of the survey effort and revisions to the BDAR undertaken since EIS exhibition and in response to agency advice received.

Engagement Activity	Description
NSW Telco Authority	
- Emails from 8 June 2023 to 26 July 2023; - Phone calls on 14 June 2023 and 28 June 2023; and - Emails from 3 May 2024 to 10 May 2024.	- The Applicant has engaged with NSW Telco Authority on several occasions via phone and email regarding the NSW Telco Authority submission which raised the potential for conflicts between NSW Telco Authority point-to-point links and WTGs B138, B139, B152, B153 and B15; and - The Applicant has worked with NSW Telco Authority to understand the perceived issues and has amended the locations of the disputed turbines to avoid such issues. NSW Telco has advised that they are satisfied with the proposed new locations of the turbines in question.
TfNSW	
- Meetings on 18 May 2023 and 31 May 2023; - Emails between 26 May 2023 and 7 July 2023; and - Meetings and emails on 9 and 16 May 2024 and 7 June 2024.	- The Applicant has engaged with TfNSW to discuss the approach to resolving submissions raised relating to the proposed transport route for Project component; and - The Applicant has engaged with TfNSW regarding the proposed oversize and overmass transport route through Muswellbrook LGA and Tamworth LGA.
Heritage NSW	
Meeting on 17 April 2023.	- The Applicant has engaged with Heritage NSW to discuss the issues raised in their submission. This included discussion about the consultation process, testing of the predictive model, recording of scarred trees, and need for subsurface testing at Green Range OS-3 with PAD and Ranch OS-1 with PAD; - The consultation process with Aboriginal groups was accepted although Heritage NSW would prefer a gap of no more than 6 months in consultation; - Additional records will be included in the ACHAR including a new AHIMS search, survey coverage mapping, and scarred tree records; and - It was agreed that no subsurface testing was required at Ranch OS-1 with PAD as it is being avoided by the Project. The Applicant will consider Heritage NSW's suggestion to monitor sites not being impacted, in particular scarred trees.

Engagement Activity	Description
EnergyCo	
- Meetings on 17 February and 21 July 2023; - Emails, phone and meetings on 18 August, 27 and 8 November 2023; and - Meetings and emails 7 and 19 February, 20 and 27 March, 11 and 15 April 2024 and throughout June and July 2024 and August 2024.	- The Applicant spoke with and held meetings with representatives from EnergyCo in February 2023 to discuss the proposed transport route for OSOM components to the site. The Applicant spoke with a representative of EnergyCo in July 2023 to discuss connection to the electricity network and potential cumulative impacts in the New England region; - The Applicant also exchanged emails, spoke on the phone and met in-person with EnergyCo between August and November 2023 to discuss community benefit funding and wider benefits for the New England region from the Project; and - The Applicant has held meetings and exchanged emails with EnergyCo in relation to the proposed oversize and overmass transport route to the New England region throughout the first half of 2024.
Department of Regional NSW	
Email and in-person meetings on 8 February, 1 March and 22 March 2023.	The Applicant has engaged with the Department of Regional NSW between February and March 2023 in relation to renewable energy opportunities and benefits for the New England region and for First Nations peoples.
Crown Lands	
- Meeting on 1 September 2023; and - Emails between 1 September 2023, 10 October 2023, and 26 March 2024, and August 2024	The Applicant spoke with the Crown Lands section of DPE (now DPHI) in relation to licencing and easement arrangements for access to Crown Land, specifically Crown Roads. The applicant also spoke with and exchanged several emails between September and August 2024 in relation to access to a Traveling Stock Reserve proposed to be used for transport of Project components.
Regional Development Australia	
Meeting on 9 March 2023.	The Applicant met with Regional Development Australia to discuss the regional benefits of jobs and skills development from the proposed Winterbourne Wind Farm Project.
Commonwealth DCCEEW	
17 April 2023.	The Applicant spoke with the Commonwealth DCCEEW on 17 April 2023 in relation to the barriers to increasing renewable energy generation and getting to net zero emissions.

Engagement Activity	Description
Walcha Council	
- Email, phone and meetings from late 2022; and - Emails, phone and meetings throughout 2023 and 2024.	- The Applicant has engaged extensively with Walcha Council members and officers since submission of the EIS in late 2022. Key matters of discussion have included negotiation of a Voluntary Planning Agreement (VPA) for the Project and the use and maintenance of local roads during Project construction; - The Applicant provided briefings about the revised transport route and proposed onsite quarry to Council officials; and - Additional points of discussion have included waste management, water supply, transport of heavy components, accommodation for workers, and overall community sentiment in the context of the New England REZ.
Uralla Shire Council	
Email, phone, meetings in 2023 and 2024.	- The Applicant has engaged with Uralla Shire Council members and the Council General Manager via email, phone, videoconference and in-person meetings throughout 2023 and early 2024. Key matters of discussion have included negotiation of a VPA for the Project and the potential for creating and utilising a new proposed OSOM transport to the south of Uralla as an alternative to OSOM transport along the Oxley Highway. - Additional points of discussion have included transport of components, materials and workers along Thunderbolts Way, as well as waste management, water supply, and materials sourcing for the Project.
Muswellbrook Shire Council	
Meeting on 9 March 2023 and 22 August 2024.	The Applicant met with representatives from Muswellbrook Shire Council in relation to the proposed transport route for OSOM loads through the Muswellbrook LGA.
Armidale Regional Council	
Email on 27 March 2023.	The Applicant contacted a representative of Armidale Regional Council to provide information on the proposed CBF and offer a briefing about the Project and potential economic benefits and opportunities for the Armidale LGA.

3.1.3 OTHER STAKEHOLDER ENGAGEMENT

The Applicant has continued to engage with a range of government, local and regional stakeholders in relation to the Project, including:

- **Transgrid** – the Applicant has engaged extensively with Transgrid throughout 2023 and 2024 in relation to the connection of the Project into the electricity grid and construction of the Project transmission line. The Applicant has engaged Transgrid’s business development company, Lumea, to prepare electrical assessments, costings, and designs in relation to the proposed transmission line and network cut-in for the Project.
- **Business NSW** – the Applicant emailed Business NSW with an offer to provide a Project briefing on 22 February and 26 July 2023.
- **Community Power Agency** – the Applicant spoke with the Community Power Agency on 24 February 2023 in relation to decommissioning of the Project and recycling opportunities for waste generated by construction of the Project.
- **NSW Farmers** – the Applicant offered a Project briefing to NSW Farmers on 12 April 2023 and 31 July 2023 and met with this organisation via video meeting on 11 December 2023, to discuss issues and benefits of renewable energy development in agricultural regions.
- **UNE Smart Region Incubator** – the Applicant attended a stakeholder forum held by the University of New England on 20 March 2023 to discuss the benefits and issues associated with renewable energy development.
- **New England Visions 2030** – the Applicant met with the Convenor of this organisation on 4 July 2023 to provide a briefing about the Project and the benefits of renewable energy for the New England region. The Applicant also attended a public forum held by this stakeholder on 8 November 2023.
- **Northern Region Local Aboriginal Land Council (LALC)** – the Applicant contacted the Northern Region LALC on 23 October 2023 to discuss appropriate contact points for First Nations employment opportunities related to the Project.
- **Amaroo Local Aboriginal Land Council** – the Applicant contacted the Amaroo LALC by email on 23 October 2023 and by phone on 11 December 2023 and met with an LALC representative at the LALC office on 5 June 2024 to offer a meeting to discuss First Nations employment opportunities. In addition, the Applicant has engaged with the LALC as a Registered Aboriginal Party in relation to the archaeological investigation conducted in July 2023 at one artefact scatter site, and in relation to additional field surveys conducted in January 2024.
- **Armidale Secondary College** – the Applicant joined with the Community Power Agency to attend a stall at the Careers Day held at the college on 26 July 2023 to chat with students interested in careers in renewable energy.
- **Department of Education** – the Applicant met with a representative from the Department on 26 July 2023 to discuss opportunities for skills training for renewable energy careers.
- **Tamworth Business Briefing** – the Applicant attended and participated in a public forum held on 31 July 2023 by the Tamworth Business Chamber to discuss how the region can maximise benefits from renewable energy development.

- **NSW State Emergency Services** – the Applicant contacted the local State Emergency Services on 2 August 2023 to offer a briefing about the Project.
- **Walcha Rotary Club** – the Applicant presented an in-person Project briefing to Walcha Rotary Club members on 19 September 2023.
- **NSW Jobs Advocate** – the Applicant met with a representative from this stakeholder via video conference on 3 October 2023 to discuss skills, training requirements and job opportunities for renewable energy projects.

3.2 FURTHER ASSESSMENT OF IMPACTS

In response to the matters raised in agency advice and public submissions, the Project layout has been amended to avoid and mitigate biodiversity, noise and visual impacts. A detailed assessment of the Amended Project is provided in the Amendment Report. Where amendments have been made to specifically address submissions, these issues are identified in **Section 4** as well as the corresponding section in the Amendment Report.

The Amendment Report (ERM, 2024) provides an assessment of changes in environmental and social impacts due to the amendments to the Project.

3.3 VOLUNTARY PLANNING AGREEMENT

Since exhibition of the EIS in 2022, the Applicant has maintained dialogue with both Walcha Council and Uralla Shire Council regarding the VPA for the Project.

In 2024, the proposed VPA was placed on public exhibition by Walcha Council and Uralla Shire Council. Following the public exhibition of the proposed VPA by each local council, the terms of the VPA were agreed by the Applicant, Walcha Council and Uralla Shire Council.

On 24 August 2024, the Applicant entered into a VPA governed by Subdivision 2 of Division 7.1 of Part 7 of the EP&A Act with Walcha Council and Uralla Shire Council.

The VPA establishes (amongst other things) two CBFs, comprising:

- A CBF for the purpose of providing funding within the Walcha LGA; and
- A CBF for the purpose of providing funding within the Uralla Shire LGA.

The Applicant has committed to making an initial contribution (indexed to CPI) in accordance with the VPA in the amount of \$1,000,000 (excluding GST).

Following the initial contribution, the Applicant will also make further contributions (indexed to CPI) in accordance with the VPA in the amount of \$750,000 per annum (excluding GST) for the life of the Project and an additional \$1,000 per annum (excluding GST) for every installed one (1) megawatt over 600 MW for the Project.

Based on the VPA, the allocation of funds from the Applicant to the two CBFs will be split as follows:

- 90% of funds to the CBF for the Walcha LGA; and
- 10% of funds to the CBF for the Uralla Shire LGA.

This allocation of funds has been informed by the relative geographic and infrastructure split of the Project within each LGA.

Walcha Council and Uralla Shire Council must each establish a community advisory committee. The committee for each council will make recommendations for the expenditure of monetary contributions made in connection with renewable energy developments, including the allocation of funds from the relevant CBF.

4. RESPONSE TO GOVERNMENT AGENCY AND LOCAL COUNCIL SUBMISSIONS

TABLE 4-1 NSW DEPARTMENT OF CLIMATE CHANGE, ENERGY, THE ENVIRONMENT AND WATER (DCCEEW) – BIODIVERSITY, CONSERVATION AND SCIENCE (BCS) DIRECTORATE SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
BCS_1 (formerly BCD)	Biodiversity – Land category assessment	The land category assessment for the development site must be amended in accordance with the mapping and advice provided by the BCD.	The BCS remarked that the Land Category Assessment report (LCA report) prepared by NGH did not incorporate the Native Vegetation Regulatory (NVR) mapping data which was provided by BCS to NGH in April 2022. In addition, the BCS stated that a site-based floristic assessment should be undertaken to demonstrate the presence or absence of Critically Endangered Ecological Communities (CEECs) and the habitat of critically endangered plants and if these features are present, the area must be mapped as Category 2 Regulated Land. NVR mapping spatial data for the Project Area was obtained from the Office of Environment and Heritage, BCS Directorate within the NSW DCCEEW. This draft NVR map combined with the field survey data and further analysis has informed the land category assessment and vegetation mapping across the Project Area. In particular, the draft NVR map been used as a starting point for the land category assessment and this spatial data has been augmented with field survey data and detailed vegetation. The results of this analysis are included in an updated LCA Report. A site-based floristic survey is not necessary because the Environment Agency Head is responsible under s60 of the <i>Local Land Services Act 2013</i> (NSW) for mapping land containing a CEEC (not the Applicant).	Section 4.1 of Amended BDAR
BCS_2	Biodiversity – Avoidance and minimisation	Further avoidance and minimisation measures are required for the proposal and documented in the BDAR to reduce impacts on biodiversity, particularly impacts on existing native vegetation in good condition, threatened and SAII entities, and the NPWS estate.	The EIS BDAR assessed that 425 ha of native vegetation will be impacted by the proposal, comprising 205 ha of woodland and 220 ha of native grassland areas. The BCD recommended further avoidance of biodiversity impacts by removing proposed infrastructure that has a direct or indirect impact on areas of native vegetation with moderate to high VI score, known threatened species habitat, areas of CEEC, and areas in proximity to National Parks and Wildlife Service (NPWS) estate. In response, the Project Layout has been amended with 21 WTGs relocated (moved > 100 m) and 52 WTGs micro-sited (i.e., moved < 100 m) to further avoid and minimise impacts to biodiversity values. As a result of the project amendments there has been a 28% reduction in impacts (to those presented in the EIS) to native vegetation. This includes a significant reduction in impacts to threatened ecological communities (TECs), which are also SAII entities. Specifically, overall impacts to White Box-Yellow Box-Blakely’s Red Gum Grassy Woodland and Derived Native Grassland have been reduced by 84%. In response to submissions received the Project layout has been further refined to increase the setback between turbines and the NPWS estate (i.e., Oxley Wild Rivers National Park). A minimum setback of 600 m has been achieved for all turbines.	Section 7 of Amended BDAR
BCS_3	Biodiversity – Vegetation mapping	The vegetation mapping must be refined to represent the native vegetation extent, composition and condition on the site more accurately, reassign Plant Community Types where required, and partition the vegetation into vegetation zones, to satisfy the requirements of the BAM 2020.	Vegetation mapping across the Project Area has been revised in accordance with the updated land category assessment, further field investigation, additional analysis of plant community types (PCTs). In particular, the vegetation mapping has been refined using a more granular method to define the boundaries of PCTs and vegetation zones including using detailed aerial imagery to create polygons that follow tree lines instead of straight lines. Large polygons have been broken down into smaller polygons and additional condition states have been created to allow more accurate mapping of vegetation.	Section 4.2 of Amended BDAR
BCS_4	Biodiversity – Vegetation Integrity Scores	Further justification and analysis are required to ensure seasonal variability and survey timing are considered when determining final Vegetation Integrity scores for the vegetation zones.	In December 2022, BCS visited the Winterbourne Wind Farm site and observed that some of the vegetation zones had significant annual weed growth. Following the visit BCS remarked that if BAM plots were undertaken during a time where exotic weeds were prolific, this would reduce the VI score for these areas. ERM can confirm that the VI scores for each vegetation zone were calculated in accordance with the BAM and that only native vegetation cover was included in the calculation of the VI score.	Section 4.2 of Amended BDAR

Ref No.	Theme	Submission	Response	Where addressed
BCS_5	Biodiversity – SAII	The current impacts to SAII entities are at an unacceptable level and further avoidance of these areas is required.	The vegetation mapping, including land category assessment has been updated in response to BCS’s submission. The refined mapping presents a more accurate categorisation of vegetation mapping across the Project area, and specifically refined mapping of areas of TECs that are SAII entities. Through refinements to the design since EIS exhibition, the Applicant has reduced the impact to areas of TEC and SAII entities, including: • Overall decrease in impacts to New England Peppermint Grassy Woodlands woody vegetation by 42%; and • Overall decrease in impacts to White Box-Yellow Box-Blakely’s Red Gum Grassy Woodland and Derived Native Grassland vegetation by 84%.	Section 9 of Amended BDAR
BCS_6	Biodiversity – Bird and bat	The bird and bat risk assessment must be updated by including consideration of survey data collected for the project and analysis of the relative likely strike risk of individual turbines for birds and bats.	Additional bird and bat utilization surveys (BBUS) have been undertaken at various times throughout 2023 to further inform and refine the assessment of potential impacts to bird and bat species, including collision risk modelling. The surveys were designed in consultation with BCS and in accordance with guidance that was released by the BCS post submission of the EIS. Assessment of survey data collected from the site informed the relative strike risk of individual turbines for bird and bat species. The following species were observed within the rotor swept area (RSA): • Wedge-tailed Eagle (<i>Aquila audax</i>); • Australian Raven (<i>Corvus coronoides</i>); • Nankeen Kestrel (<i>Falco cenchroides</i>); • Brown Falcon (<i>Falco berigora</i>); and • Whistling Kite (<i>Haliastur sphenurus</i>). Modelled collision risk for these species combined estimated 0.63 collisions per annum based on 99% avoidance scenario, 1.27 collisions per annum based on 98% avoidance scenario, and 3.17 collisions per annum based on 95% avoidance scenario.	Section 7.3 of BDAR
BCS_7		Further assessment of turbine barrier effects on fauna is required.	Further assessment of turbine barrier effects has been included in the Amended BDAR. The assessment determined that at a regional scale there is connected habitat through the centre of the Project area from north to south. At a local scale, there are smaller patches of remnant vegetation that connect areas of habitat adjacent to the Project area to connected habitat that runs through the Project area. The assessment concluded that turbines do not substantially affect the functionality of either the regional or local habitat pathways.	Section 7 of Amended BDAR
BCS_8		Further bird utilisation survey effort must be undertaken in consultation with the BCD.	Additional BBUS have been undertaken at various times throughout 2023 to further inform and refine the assessment of potential impacts to bird and bat species, including collision risk modelling. The surveys were designed in consultation with BCS and in accordance with guidance that was released by the BCS post submission of the EIS.	Section 2.2 and Section 7.3 of BDAR,
BCS_9		Further surveys to identify raptor nesting sites within the Project Area are required.	Additional surveys have been undertaken to identify raptor nesting sites across the Project Area. The surveys demonstrate that there are few raptor nesting sites within the Project Area, and those that were identified are buffered from turbine locations.	Section 2.2.4 of Amended BDAR

Ref No.	Theme	Submission	Response	Where addressed
BCS_10		Further work must be undertaken to map glossy black-cockatoo habitat, identify known or likely flight paths for the species and apply turbine-free buffers to habitat and flight paths to reduce the risk of strike impacts.	Additional surveys have been undertaken to map glossy black-cockatoo habitat and known or likely flight paths across the Project Area, including identifying suitable hollow-bearing trees. Glossy-black cockatoos are generally associated with larger patches of remnant vegetation, and the Applicant has not placed any Project infrastructure within such areas and has provided significant buffers between Project infrastructure and such habitat. Observations of Glossy Black-cockatoos from the Project area demonstrated that they typically fly at just above canopy height, below the turbine rotor swept area. Glossy Black-cockatoos are forest species and therefore their flight paths tend to follow vegetated areas. As discussed previously, there is connected habitat through the centre of the Project area from north to south. At a local scale, there are smaller patches of remnant vegetation that connect areas of habitat adjacent to the Project area to connected habitat that runs through the Project area. The assessment concluded that turbines do not substantially affect the functionality of either the regional or local habitat pathways.	Section 2.2.4 of Amended BDAR
BCS_11		Further bat utilisation survey effort must be undertaken in consultation with the BCD, with surveys to include additional sites where data gaps are evident and the use of ultrasonic detectors at-height on wind masts.	Additional BBUS have been undertaken at various times throughout 2023 to further inform and refine the assessment of potential impacts to bird and bat species, including collision risk modelling. The surveys were designed in consultation with BCS and in accordance with guidance that was released by the BCS post submission of the EIS.	Section 7.3.2 of Amended BDAR
BCS_12		Further micro-siting of the proposed turbine locations is required to minimise the risk of bat strike impacts and to achieve the 120m buffer required between rotor blade tips and treed areas.	The design has been refined with consideration of previous (EIS) and additional (post-EIS) bird and bat survey data. ERM have generally followed the Draft guidelines.	Section 5.2 of Amended BDAR
BCS_13	Biodiversity – Threatened fauna survey effort	Additional targeted surveys must be undertaken for target frog species, eastern pygmy possum, rufous bettong and little eagle to satisfy BAM 2020 requirements. Alternatively, the assessor may obtain expert reports or assume presence for species for which sufficient survey / habitat assessment has not been completed.	Additional targeted surveys for target frog species, eastern pygmy possum, rufous bettong and little eagle were undertaken in August, September and November 2023. Survey methodology was in accordance with the BAM and was discussed with BCS prior to undertaking surveys. An expert report has been prepared for the yellow-spotted tree frog (<i>Litoria castanea</i>) and concludes that this species was not ever present within the locality and therefore there is no reason to produce a polygon to protect PCTs within a 200 m radius of available ponds.	Section 7.2.4 of Amended BDAR
BCS_14		Additional habitat assessments must be undertaken for hollow-bearing trees and stick nests within the development site and buffer area.	Additional surveys have been undertaken to map hollow bearing trees across the Project Area.	Section 2.2.4 of Amended BDAR
BCS_15	Biodiversity – Threatened flora survey effort	The adequacy of the targeted threatened flora surveys should be reviewed with an updated land category map, with further targeted surveys undertaken as required by the BAM 2020 and further justification provided in the BDAR for excluding areas of exotic vegetation from such surveys.	The revised vegetation mapping has been used to refine targeted flora survey requirements. Additional targeted flora surveys were undertaken in May 2023, August 2023, September 2023, October 2023, November 2023, December 2023 and January 2024. Justification has been provided (Section 2.2.3 of the Amended BDAR) for excluding areas of exotic vegetation from surveys.	Section 2.2.3 of Amended BDAR
BCS_16	Biodiversity – Species polygons	Species polygons for the barking owl and glossy black-cockatoo must be revised to include all areas of potential breeding habitat.	Species polygons for the barking owl and glossy black-cockatoo have been revised to include all areas of potential breeding habitat.	Section 5.2 of Amended BDAR
BCS_17		Further detail and justification must be provided for the buffer distance used to exclude isolated patches of habitat from the greater glider species polygon.	The buffer distance used to exclude isolated patches of habitat for the greater glider species polygons has been reviewed and refined.	Section 5.2 of Amended BDAR
BCS_18	Biodiversity – Listing status of threatened species	The revised BDAR must include up-to-date listing status for threatened species and any additional assessment required based on that changed status.	The listing status of threatened species and communities has been reviewed and revised as necessary and additional assessment undertaken as required. Note that listing status was current to October 2023.	Section 5.2 of Amended BDAR
BCS_19	Biodiversity – Offsets	A more detailed Bird and Bat Adaptive Management Plan framework should be prepared in consultation with the BCD and included with the revised BDAR.	A framework Bird and Bat Adaptive Management Plan (BBAMP) is provided with the Amended BDAR.	Section 7.3 of Amended BDAR

Ref No.	Theme	Submission	Response	Where addressed
BCS_20	Biodiversity – Indirect impacts	Further information is required to address the full extent of indirect impacts associated with the proposal, including calculating biodiversity credits to offset the indirect impacts as described in the BAM Operational Manual Stage 2.	The Amended BDAR includes additional assessment of indirect impacts and as necessary an update to the biodiversity offset credits (ecosystem and species credits) required to offset those indirect impacts.	Section 8.2 of BDAR
BCS_21	Biodiversity – Haul Route Biodiversity Risk Assessment	Detailed biodiversity surveys and assessment for the haulage route must be undertaken in accordance with the BAM 2020 and included in the BDAR prior to the proposal being determined.	The Applicant has engaged with both Transport for NSW and DPHI on requirements for the assessment of the transport route from the Port of Newcastle to site. The Submissions Report and Amendment Report assume that the upgrades proposed by EnergyCO for the Central West Orana REZ, and by the proponent of a consented development north of Bendemeer will be completed prior to the commencement of construction of the Project. These upgrades will be sufficient to accommodate the dimensions of the infrastructure proposed for the Project. Therefore, the Applicant has assessed only the sections of the transport route from Tamworth. Impacts to biodiversity values along the relevant sections of the transport route has been undertaken and included in the amended BDAR.	Appendix B of Amended BDAR
BCS_22	Hazards (Bushfire)	Further detailed assessment of the proposal's impacts on NPWS firefighting and park management operations is required, consistent with the SEARs, with explicit consideration of: - The impacts of the loss of any waterbodies on or near the development site that are currently available to support fire management in the national park as sources of water for helicopter bucketing; - The extra distance and time taken for insertion/extraction of remote firefighters in the Winterbourne and Apsley Gorge sections of the national park, assuming flight paths from Armidale and Walcha; - The loss of Westpac Life Saver Rescue Helicopter Service's assistance in search and rescue operations in the national park; and - Implications for future use of Very Large Air Tankers and Large Air Tankers to suppress fires in the area.	The NSW RFS reviewed the EIS and commented that the bushfire mitigation measures, as outlined in Section 6.5.2.4 of the EIS, dated 27 October 2022, are accepted and should be included in any approval granted.	Section 6.5.4.2 of the EIS NSW RFS Agency Advice
BCS_23		The proposal should be referred to the Civil Aviation Safety Authority for a determination of the need for obstacle lighting for the turbines and towers.	The Applicant engaged with CASA during the development of the EIS. The EIS was also sent to CASA for review by DPE (now DPHI) during the public exhibition period. Further engagement with CASA has been undertaken during the response to submissions phase. A safety risk assessment of the Project undertaken by the Applicant's aviation consultant concludes that the WTGs and WMTs will not require obstacle lighting to maintain an acceptable level of safety to aircraft.	Amended Aviation Impact Assessment, Appendix M of Amendment Report
BCS_24		Conditions of consent must be included to require engagement with local aerial firefighting and agricultural operators to develop procedures for such flight operations in the vicinity of the Project, for approval by the Secretary and subject to annual review and updates as required.	The NSW RFS reviewed the EIS and commented that the bushfire mitigation measures, as outlined in Section 6.5.2.4 of the EIS, dated 27 October 2022, are accepted and should be included in any approval granted.	Appendix L to EIS
BCS_25		Further detailed assessment of the proposal's bush fire risks is required consistent with the SEARs.	The NSW RFS reviewed the EIS and commented that the bushfire mitigation measures, as outlined in Section 6.5.2.4 of the EIS, dated 27 October 2022, are accepted and should be included in any approval granted.	Section 6.5.4.2 of the EIS NSW RFS Agency Advice
BCS_26		The wind farm layout should be reconfigured so that no turbines are located within 600m of key water points and no other turbines are within at least 600m of the national park boundary.	The design has been refined such that turbines are at least 600 m from the boundary of the Oxley Wild Rivers National Park.	Figure 1-4
BCS_27	Landscape and Visual	Reassessment of the visual impacts in the wilderness must be undertaken using a 3-D Digital Elevation Model to identify those turbines that will intrude into the skyline when viewed from the wilderness areas of the national park – including the Green Gully walk and other points within the wilderness where there is currently no intrusion above the skyline – and all turbines having such impacts must be relocated/removed to eliminate those impacts.	Turbine B116 has been relocated such that it is no longer adjacent to the national park boundary. Turbines B070 and B110 have been micro-sited (i.e., moved < 100 m) to ensure turbines are at least 600 m from the national park boundary. An updated ZVI has been prepared with the new layout and indicates very limited parts of the Green Gully Track with potential visibility to the Project. These views are distant (in excess of 20 kms).	Appendix F of Amendment Report

Ref No.	Theme	Submission	Response	Where addressed
BCS_28	Noise	Further noise assessment is required that considers anyone camping within the national park, including in areas remote from designated campgrounds, as highly sensitive receivers, and which assesses noise impact on those receivers using noise contours and attenuation relevant to those locations and uses.	The SEARs reference the Noise Policy for Industry (NPfI) as the method of assessment for noise from the Project to the National Park. The NPfI sets a criterion of 50 dB(A) for National Parks to be achieved within 'areas that are reasonably expected to be used by people, for example, picnic areas or walking tracks'.	Appendix G of the Amendment Report
BCS_29		Turbines that are audible within the national park must be removed.	The Noise Impact Assessment submitted with the EIS (Sonus, 2022) includes predicted noise levels within the Oxley Wild River National Park. It adopts a 35 dB(A) baseline criterion for campgrounds within the National Park, consistent with the criteria applied by the Wind Energy Noise Assessment Bulletin (DPE, 2016) at permanent dwellings. This level is 15 dB(A) below the requirement of the NPfI and therefore the SEARs. In addition, the noise contours presented in the NIA indicate that noise levels will not exceed 40 dB(A) within any other commonly used areas of the park (including, walking trails, lookouts or other points of interest), and will therefore also readily achieve the 50 dB(A) criterion applicable under the NPfI and therefore the SEARs. It is therefore considered that the SEARs are satisfied with respect to noise impacts within the National Park. Inaudibility is not an appropriate or relevant consideration. Notwithstanding the above, the noise assessment has been updated and compares the Amended Project to the EIS proposal. The updated Noise Assessment shows that the predicted noise levels of the revised Project layout will be similar or lower at the National Park compared to the original Project layout.	
BCS_30	Biodiversity	Development infrastructure must be removed from proximity to the national park where it will have an adverse effect on any corridors of native vegetation that connect to the national park.	Project infrastructure, excluding existing farm access tracks that will be used by the Project, has, where necessary, been moved so that it provides at minimum a 500 m buffer to the National Park boundary. The BDAR has not identified any significant impacts on fauna corridors adjacent to the National Park.	Figure 1-4
BCS_31		No turbines are to be located within at least 500 m of the national park boundary (noting that, as recommended for safe fixed-wing aircraft operations, this buffer should be at least 600m).	Turbine B116 has been relocated such that it is no longer adjacent to the national park boundary. Turbines B070 and B110 have been micro-sited (i.e., moved < 100 m) to ensure turbines are at least 600 m from the national park boundary. The design refinements have achieved at minimum a 600 m separation between Project WTGs and the boundary of the Oxley Wild Rivers National Park.	Figure 1-4
BCS_32	Electromagnetic interference	Turbines B071 and B073 must be relocated out of the interference zone of the NPWS point-to-point link as recommended in Appendix N of the EIS.	While turbines B071 and B073 were identified within the potential interference zone of the NPWS point-to-point link; however, the assessment states that these interference zones are conservative. Engagement with NPWS was undertaken to during the preparation of the Telecommunications EMI Study that informed the EIS. The response received from NPWS was that they 'do not expect the Project to cause interference to their point-to-point links crossing the Project Area'. Furthermore, according to NPWS, modelling undertaken by the NSW Rural Fire Service on their behalf has shown that the link is expected to be sufficiently clear of WTGs in the vertical plane to avoid any material interference. NSW Telco Authority have also confirmed that the WTG locations in the amended layout are acceptable.	Telecommunications EMI Study (DNV, 2022); Appendix L of Amendment Report
BCS_33		Conditions of consent must be included that require rectification of any issues with multipoint communications encountered in the first five years of the wind farm's operation.	The Telecommunications EMI Study recommends that the Applicant commits that any interference caused by the Project following construction will be rectified.	Telecommunications EMI Study (DNV, 2022); Appendix L of Amendment Report
BCS_34	Biodiversity – MNES	Due to the numerous changes required to the BDAR and the effect that mapping changes will have on Matter of National Environmental Significance (MNES), the BCS is currently unable to undertake a detailed review of the information provided in accordance with the assessment bilateral agreement with the Australian Government under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999. We will undertake our review under the assessment bilateral agreement after the updated BDAR has been prepared and submitted to the consent authority.	Noted, an Amended BDAR has been prepared.	Amended BDAR, Appendix E of Amendment Report

TABLE 4-2 CROWN LANDS (CL) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
CL_1	General	The map of Crown lands shown on page 41 of the report 'Crown Lands and Paper Roads' is not accurate, as it shows sections of National Park and freehold lands as being Crown land.	The figure on page 41 of the EIS 'Crown Lands and Paper Roads' (Figure 3-7) has been updated.	Updated Project Description, Appendix A of Amendment Report
CL_2	Planning and Permits – Post Approval	The Department will need to be referenced, prior to any use or occupation of any Crown roads. Authority to use, traverse, access or build infrastructure on Crown land and roads is required under the <i>Crown Land Management Act 2016</i> and/or the <i>Roads Act 1993</i> . It is recommended that the proponent contact the Department as early as possible to discuss and initiate the processes required to authorise the use of and/or access to Crown roads. Crown roads required for access or infrastructure will require application be made to close and purchase the roads. Interim tenures may be provided to allow works to proceed prior to the road closing process being completed.	The Applicant has contacted the Department to discuss the process required to authorise the use of and/or access to Crown roads, and such process will be initiated should the Project achieve development approval. This requirement has been included as a mitigation and management commitment in Appendix B.	Updated Mitigation Measures, Appendix B of Amendment Report
CL_3		Crown reserves affected for the proposed transport route including road upgrades include Lot 7010 DP 1058937 and Lot 7031 DP 1058953 (being reserved for Travelling Stock) being 'Saleyard Road' and part Lot 7016 DP 94120 (being reserved for Racecourse). It is important to note that authority must be in place before Crown land can be used. The Proponent should contact Crown Lands regarding any requirements for widening formed roads that may impact Crown reserves.		
CL_4		In order for transmission lines to traverse Crown roads, the proponent will need to apply for easements. As the easement process may be lengthy, it is recommended that the proponent apply for a licence under the <i>Crown Land Management Act 2016</i> or a s138 deed of agreement under the <i>Roads Act 1993</i> for each Crown road as soon as possible.		

TABLE 4-3 NSW ENVIRONMENT PROTECTION AUTHORITY (EPA) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
EPA_1	Recommended Conditions (Planning Approval)	The EPA has reviewed the EIS and notes that the EIS does provide the information required by the SEARs. The EPA has the following additional comments and recommendations: Except as expressly provided by the general terms of approval, works and activities must be carried out in accordance with the Winterbourne Wind Farm Environmental Impact Statement.	Noted and included as commitment in Appendix B.	Updated Mitigation Measures, Appendix B of Amendment Report
EPA_2		Except as expressly provide by an Environment Protection Licence (EPL) under the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) in relation to the development, section 120 of the POEO Act must be complied with in, and in connection with, the carrying out of the development. Any variations to the EPL are to be negotiated with the EPA.	Noted and included as commitment in Appendix B.	
EPA_3	Recommended Conditions (Soil and Water)	Except as expressly provided for by the EPL, the Proponent must not discharge any wastewater from the Concrete Batching Plant(s) associated with the Project.	Noted and included as commitments in Appendix B.	
EPA_4	Recommended Conditions (Soil and Water)	An Erosion and Sediment Control Plan (ESCP) must be prepared for all aspects of the construction / operation phase of the development and must be implemented. Implementation of the scheme must avoid or minimise the impacts of stormwater runoff from and within the premises during construction / operation. The Stormwater Management Plan should be consistent with the practices and principles contained in <i>Managing Urban Stormwater – Soils and Construction</i> , Volumes 1 and 2 (Landcom, 2004; DECC, 2008).	Noted and included as commitments in Appendix B.	

Ref No.	Theme	Submission	Response	Where addressed
EPA_5		The proponent must prepare a Soil and Water Management Plan to address all proposed activities and potential impacts associated with the Project. The Plan must set out the procedures for investigating, and if necessary, mitigating surface water, erosion and /or sedimentation impacts of the Project.	Noted and included as commitments in Appendix B.	
EPA_6	Recommended Conditions (Air Quality)	The proponent must, as far as practicable, prevent or minimise the generation of air emissions, including dust generation, from the site.	Noted and included as commitments in Appendix B.	
EPA_7	Noise and Vibration – Construction Traffic Noise	The EPA does not have a statutory role in regulating traffic noise impacts as any EPL is premise based, however has provided the following advice on construction noise impacts in an advisory context: The modelling algorithm/package to predict traffic noise levels has not been provided in the NIA. Based on the noise levels presented in the NIA, construction noise traffic noise impacts exceeding the recommended noise level thresholds in the Road Noise Policy (RNP – EPA, 20213) are predicted to occur. The NIA concludes that: “there is the potential the traffic noise criteria to be exceeded at any residence within: 80m of a Local Road outside of townships; or, 50m of a Local Road within townships”. The NIA then goes on to state that locations were the road traffic noise criteria may be exceeded include: “residences without identity in the Wind Farm Assessment on Saleyard Road and Darjeeling Road”. These roads are located on the northern fringe of Walcha. However, there are indications that additional residences on Thunderbolt Way, Uralla Road, Jamieson Street and EMU Creek Road are also within the offset distances likely to result in noise exceeding the RNP recommendations. The EPA recommends that DPE (now DPHI) evaluate the above points and determine if additional information is required to consider potential construction noise impacts as part of the planning determination.	The road traffic noise levels presented in the Noise Impact Assessment (the Sonus Report) were conservatively predicted based on previous noise measurements of construction vehicles, adjusted based on the distance of noise sensitive receptors from the road and the traffic volumes predicted during peak construction. The predictions have now been reviewed based on the widely accepted Calculation of Road Traffic Noise (CoRTN) algorithm using the same inputs. The results of the CoRTN predictions confirm that the predictions presented within the report are conservative (i.e., higher than those predicted using CoRTN). It should be noted that the Road Noise Policy criteria are designed around permanent changes to the road network (such as upgrades of existing roads or construction of new roads). While exceedances of the Road Noise Policy criteria due to construction of a large-scale project (such as the Project) are often inevitable, the impacts will be temporary (even if construction occurs over multiple years), with noise largely returning to present levels once construction is completed. Any exceedances of the Road Noise Policy criteria should therefore be considered in this context.	This table
EPA_8	Air Quality – Dust	The EPA recommends that mitigation measures outlined in section 6.10.4 of the EIS are updated to include additional measures to address any air quality issues arising from rock crushing and screening activities.	Noted: Impacts to air quality will be managed through the implementation of specific measures to be documented in the Environmental Management Strategy to be prepared prior to construction. The Environmental Management Strategy will address air quality issues arising from rock crushing and screening activities (e.g., crushing and screening plant to operate with dust extraction system, use of dust suppression sprays) and Appendix B has been updated to include this as a commitment.	Updated Mitigation Measures, Appendix B of Amendment Report

TABLE 4-4 CIVIL AVIATION SAFETY AUTHORITY (CASA) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
CASA_1	Hazards - Aviation	The Aviation Impact Assessment (AIA) advises that the W128 route LSALT should be increased by 200 ft from 5900 ft to 6100 ft to accommodate WTGs within a 5 nm buffer area of this air route. The Airservices assessment of 30 October 2020 advises that the wind farm will not affect any published air route LSALTs. An updated Airservices assessment is recommended.	Airservices Australia advised in its correspondence dated 30 October 2020, having reviewed a draft version of the AIA (v0.2 dated 28 September 2020) that the air route safety height would not be impacted. The AIA (Aviation Projects, 2022) submitted with the EIS identified a potential impact on the protection surface of air route W128 and recommended the safety height be increased by 200 ft from 5900 ft above mean sea level (AMSL) to 6100 ft AMSL. Airservices Australia made a submission on the EIS confirming the recommendation in AIA and that the Project would not have an impact on any Airservices designed instrument procedures, CNS facilities or ATC operations at Armidale aerodrome.	Amended Aviation Impact Assessment, Appendix M of Amendment Report

Ref No.	Theme	Submission	Response	Where addressed
CASA_2		CASA considers the proposed Winterbourne Wind Farm will be a hazard to aviation safety, but the risk to aviation safety could be mitigated to some extent by the provision of obstacle lighting. CASA recommends that the wind farm is obstacle lit with medium intensity steady red lighting in accordance with the NASF Guideline D and section 9.31 of the CASA Part 139 (Aerodromes) Manual of Standards. The Defence assessment of 22 October 2020 advises: <i>If CASA determines that obstacle lighting is to be provided, it should be compatible with persons using night vision devices. If LED lighting is proposed, the frequency range of the LED light emitted should be within the range of wavelengths 665 to 930 nanometres. Defence has no objection to the proposed wind farm provided that the project complies with the above conditions.</i>	CASA publishes Advisory Circular AC 139.E-05v1.1 Obstacles (including wind farms) outside the vicinity of a CASA certified aerodrome. As defined in AC 139.E-05v1.1, 'outside the vicinity of an aerodrome' is outside the limits of the obstacle limitation surface (OLS) of a CASA certified aerodrome. The proposed WTGs are outside the vicinity of any certified aerodromes (refer Section 6.6 of the AIA). These extracts from AC 139.E-05v1.1 are relevant: <i>2.2.4.1 Part 139 of the Civil Aviation Safety Regulations 1998 (CASR), regulates obstacles within the vicinity of certified aerodromes. This is supported by Part 139 (Aerodromes) Manual of Standards (MOS) which provides the definition of an obstacle as well as the standards for marking and lighting of an obstacle.</i> <i>2.4.3.3 CASA has no authority or regulatory powers in relation to a wind farm or tall structure approval outside the vicinity of a certified aerodrome but advice from CASA will inform the planning authority in regard to any decisions or conditions on any approval the planning authority might place on a development.</i> <i>Regardless of any CASA advice, planning authorities make the final determination via conditions of consent as to whether a wind farm or tall structure not in the vicinity of a CASA regulated aerodrome will require lighting or marking.</i> Because the WTGs are outside the vicinity of an aerodrome, the requirements of CASR Part 139 and the associated Part 139 Manual of Standards (MOS) 2019 are not strictly applicable. The AIA includes a comprehensive risk assessment to consider the need for obstacle lighting as a mitigator of the identified aviation hazard and concluded that the wind farm would not require obstacle lighting to maintain an acceptable level of safety to aircraft.	Amended Aviation Impact Assessment, Appendix M of Amendment Report EIS: Appendix K, Aviation Impact Assessment
CASA_3		While international standards require, and the NASF guideline recommends 2,000 candela lighting intensity; CASA would accept 200 candela lighting intensity. If the lighting fails, it should fail in the 'on' condition until it can be rectified	Aviation Projects has undertaken a safety risk assessment of the Amended Project and concludes that the WTGs and WMTs will not require obstacle lighting to maintain an acceptable level of safety to aircraft.	Amended Aviation Impact Assessment, Appendix M of Amendment Report
CASA_4		CASA is prepared to review a lighting plan that indicates which turbines are proposed to be lit, if requested. CASA only considers aviation safety and does not consider the effect of lighting on neighbours. However, CASA notes there are recommended treatments including measures such as baffling and Aircraft Detection Lighting Systems listed in Page 82 Table 17 Risk ID 5 ('Effect of obstacle lighting on neighbours') of the AIA. Also, Annexure 5 describes shielding to restrict the downward component of light. The Visual Impact Assessment Annex I Section 12.4 also describes mitigations to reduce the potential visual impact of obstacle lighting.	The Amended AIA has not recommended obstacle lighting.	Amended Aviation Impact Assessment, Appendix M of Amendment Report
CASA_5		CASA agrees with the recommendations at Section 11 starting on page 87 of the Aviation Impact Assessment; except for Recommendation 8 Lighting of Turbines.	Noted.	Amended Aviation Impact Assessment, Appendix M of Amendment Report
CASA_6		Further to Recommendation 3, on commencement of the (vertical) construction of the first turbine, or a 149 m high Wind Monitoring Tower if preceding the turbines, Airservices Australia should be requested to publish a NOTAM.	Noted and included as commitments in Appendix B.	Updated Mitigation Measures, Appendix B of Amendment Report Amended Aviation Impact Assessment, Appendix M of Amendment Report

Ref No.	Theme	Submission	Response	Where addressed
CASA_7		Further to Recommendation 7, the Wind Monitoring Towers in the order of 149m AGL should be marked to some extent, depending on the proximity to the surrounding turbines. CASA recommends marker balls on the upper guy wires as a minimum.	The AIA recommends markings on WMTs in accordance with NASF Guideline D at paragraph 39: - The top 1/3 of wind monitoring towers to be painted in alternating contrasting bands of colour; - Marker balls or high visibility flags or high visibility sleeves placed on the outside guy wires; and - Ensuring the guy wire ground attachment points have contrasting colours to the surrounding ground/vegetation.	Amended Aviation Impact Assessment, Appendix M of Amendment Report
CASA_8		Further to Recommendation 5, and noting that AIA Section 4.4 advises: ‘each conductor bundle will include orange balls for visual identification and an earth shield wire/s, protecting the line from lightning strikes’, the proponent should liaise with Aerial Agricultural Operators to determine which transmission lines should be marked, for example with additional marker balls. The following Australian Standard could be considered regarding the overhead transmission lines: AS 3891.2, Air navigation — Cables and their supporting structures — Marking and safety requirements, Part 2: Low-level aviation operations.	Noted and included as commitments in Appendix B.	Amended Aviation Impact Assessment, Appendix M of Amendment Report Updated Mitigation Measures, Appendix B of Amendment Report
CASA_9		If the permanent 149m AGL Wind Monitoring Towers are to be installed a significant duration before the turbines and are in a prominent position, then they should incorporate a medium intensity red obstacle light at night and in poor visibility.	Obstacle lighting is not required on the WMTs to maintain acceptable levels of safety to aircraft.	Amended Aviation Impact Assessment, Appendix M of Amendment Report

TABLE 4-5 NSW TELCO AUTHORITY (NSW TA) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed																		
NSW TA_1	Telecommunications	Based on the maximum WTG tip height of 230 m and blade size of 81 m, NSW TA recommend: - B138 – move 40m Northeast, or 50m North - B139 – move 120m Southwest, or 140m South - B152 – move North, minimum 500m - B153 – move West, minimum 400m - B154 – move East 1km or South East minimum 650m.	Based on this advice and subsequent consultation with NSW TA, turbines B138, B139, B152, B153 and B154 have been relocated. The revised turbine locations as shown in the Table below were accepted by NSW TA (email correspondence dated 26 July 2023 and 9 May 2024), providing the Applicant consults with NSW TA for further review and endorsement if any turbine locations deviate from the coordinates listed below.	Amended Telecommunications and Electromagnetic Interference Study, Appendix L of Amendment Report																		
			<table><tr><th>Turbine</th><th>Latitude</th><th>Longitude</th></tr><tr><td>B138A</td><td>-31.014478</td><td>151.808280</td></tr><tr><td>B139A</td><td>-31.018366</td><td>151.810928</td></tr><tr><td>B152A</td><td>-31.036334</td><td>151.884838</td></tr><tr><td>B153A</td><td>-31.041216</td><td>151.883154</td></tr><tr><td>B154A</td><td>-31.043973</td><td>151.891112</td></tr></table>		Turbine	Latitude	Longitude	B138A	-31.014478	151.808280	B139A	-31.018366	151.810928	B152A	-31.036334	151.884838	B153A	-31.041216	151.883154	B154A	-31.043973	151.891112
			Turbine		Latitude	Longitude																
			B138A		-31.014478	151.808280																
			B139A		-31.018366	151.810928																
			B152A		-31.036334	151.884838																
			B153A		-31.041216	151.883154																
B154A	-31.043973	151.891112																				

TABLE 4-6 FIRE AND RESCUE NSW (FRNSW) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
FRNSW_1	Hazards – BESS	FRNSW make the following recommendations: That a comprehensive Fire Safety Study (FSS) is developed. The FSS is to be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.21 and is to meet the operational requirements of FRNSW.	These are standard conditions of approval. A Fire Safety Study for the BESS will be prepared following approval of the Project and will address the requirements of HIPAP and the FRNSW guidelines.	Updated Mitigation Measures, Appendix B of Amendment Report
FRNSW_2		That the development of the FSS consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence. The FSS should consider worst-case fire scenarios including a full BESS unit fire and demonstrate no fire propagation within the facility.		
FRNSW_3		That the FSS be submitted, reviewed, and meet the operational requirements of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).		
FRNSW_4		That the development of a FSS be a condition of consent.		
FRNSW_5		That a comprehensive Emergency Response Plan (ERP) is developed for the site in accordance with HIPAP No.1.2 The findings of the FSS should inform the development and content of the ERP.		
FRNSW_6		That an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.		
FRNSW_7		That an Emergency Responders Induction Package is developed for the site in consultation with, and to the satisfaction of FRNSW prior to commissioning of the site. The package should inform first responders of site-specific features and safety measures to ensure they are able to undertake their duties effectively in accordance with agency specific Standard Operational Guidelines. The format of the Induction Package should be such that it can be readily shared across all Agencies.		

TABLE 4-7 NSW RURAL FIRE SERVICE (NSW RFS) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
NSW RFS_1	Hazards – Bushfire	NSW RFS has reviewed the EIS and comments that the bushfire mitigation measures, as outlined in Section 6.5.2.4 of the EIS prepared by ERM, dated 27 October 2022 are accepted and shall be included in any approval granted.	Noted.	This table

TABLE 4-8 DEPARTMENT OF REGIONAL NSW – MINING, EXPLORATION AND GEOSCIENCE (MEG) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
MEG_1	Stakeholder Engagement	Exploration Licence (EL) 9338, held by Iolanthe Minerals Pty Ltd, overlaps the far northern portion of the Project. As required by the SEARs, the proponent must consult with the holders of all current mineral title that overlap the Project Area. If not already undertaken MEG-GSNSW requests that consultation takes place with Iolanthe Minerals.	The Applicant has attempted to contact Iolanthe Minerals Pty Ltd via email on 16 March 2022 and again on 23 June 2023 to advise that EL9338 is within the far northern portion of the Project Area. Spatial data of the Project layout and an extract of the Project description were also provided. No response has been received to date from the EL holder. The Applicant will make further attempts at consultation with the EL holder.	This table

TABLE 4-9 TRANSGRID SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
Transgrid_1	N/A	Please be advised a Connection Process Agreement (CPA) is underway for Winterbourne Wind Farm and Transgrid will continue to liaise directly with the customer. Transgrid has no further comment at this stage.	The Applicant entered into a Connection Process Agreement with Transgrid for the Project in July 2020.	This table

TABLE 4-10 WATERNSW SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
WaterNSW_1	Project description	Please note that as the subject site is not located close to any WaterNSW land or assets, and as an SSD any flood works or licensing approvals will be assessed by others, WaterNSW has no comments or particular requirements.	Noted.	This table

TABLE 4-11 HERITAGE NSW SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
Heritage NSW_1	Aboriginal Heritage – Stakeholder Engagement	The applicant should request additional information of the consultation process, and need to provide evidence that consultation was kept continuous as the last consultation recorded in the ACHAR is dated November 2021, with an additional gap in 2021. Heritage NSW requires that consultation with Registered Aboriginal Parties (RAPs) is continuous. Under our guidelines, breaks in consultation of over six months may not constitute continuous consultation. If an unexpected break of greater than six months has occurred, the applicant may be required to restart the consultation process.	During the completion of the ACHAR that informed the EIS, there was no break in consultation with RAPs longer than six months from notification of the Project and registration of interest in March 2020 i.e., Stage 1 of the Aboriginal cultural heritage consultation requirements (ACHRs), and the conclusion of the review of draft Aboriginal Cultural Heritage Assessment Report (ACHAR) on 17 December 2020, i.e., Stage 4 of the ACHRs. The requirement for continuous consultation is not specified in the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW, 2010); however, the Applicant is now aware that this is the expectation of Heritage NSW for SSD projects. The Applicant met with Heritage NSW on 17 April 2023. Notwithstanding Heritage NSW’s preference for gaps in consultation to not exceed 6 months, it was acknowledged that the <i>Aboriginal cultural heritage consultation requirements for proponents</i> had been followed correctly.	This table
Heritage NSW_2		Clarification of why the Northern Daily Leader was chosen as the local newspaper for the advertisement as required for Stage 1 of Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) rather than a newspaper from the Armidale area.	The placement of the advertisement for Stage 1 of the ACHRs occurred in April 2020 concurrent to the first wave of the COVID-19 pandemic. This event caused considerable disruption to local newspapers, particularly those in rural areas. As the Project Area was not entirely confined to the Walcha area, newspapers with a broader distribution area were sought. The Armidale Express had suspended publication due to COVID-19 so subsequently the Daily Leader was selected as they were still publishing and stated that their distribution covered the Project Area. See below a map of distribution shown on the Daily Leader website (www.acmadcentre.com.au/brands/the-northern-daily-leader-tamworth/): 	This table
Heritage NSW_3	Aboriginal Heritage – Assessment Methodology	Section 5 of the ACHAR has presented limited number of case studies and predictive models for the New England region. In accordance with Requirement 1a of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) please provide a more detailed and up to date synthesis of the archaeological and ethnohistory of the region and describe and evaluate the existing predictive models for the region. Following this updated assessment, the predictive model may require updating.	Section 5.3 of the Revised ACHAR has been updated to include a current synthesis of the archaeological context of the region of the Project Area. This analysis allowed the predictive model (Revised ACHAR Section 5.5) to be reassessed and refined.	Revised ACHAR, Amendment Report: Appendix G

Ref No.	Theme	Submission	Response	Where addressed
Heritage NSW_4		Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. Heritage NSW requires, as per Requirement 1b of the Code of Practice, that AHIMS searches are contemporaneous with the Project. We consider that AHIMS searches of over 12 months old need to be updated. Please update the AHIMS search.	Two new AHIMS searches were undertaken on 11 April 2024; one for the east of the Project Area, and one for the west (Client Service ID: 758054 and Client Service ID: 758047). The results of the search show that no additional sites have been recorded within the Project Area beyond those shown in Section 6 of the Revised ACHAR. The new site search is shown on Appendix 4 of the Revised ACHAR. All sites within the Project Area are identified by their AHIMS ID. Apart from previously recorded AHIMS site 21-4-0041, all the identified sites were recorded during the assessment phase for the EIS. AHIMS site 21 4 0041 is identified and discussed in the ACHAR.	Revised ACHAR, Amendment Report: Appendix G EIS: Appendix O, ACHAR
Heritage NSW_5		Provide detailed and thorough mapping which includes all survey track logs, as per Requirement 5 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010), to enable Heritage NSW to assess the efficacy of the survey coverage. The example provided in Figure 6-1 show limited survey coverage of the wind turbine generators, while the ACHAR notes that access tracks, underground reticulation, ETL alignments, ancillary infrastructure, and substations were only sampled. If the areas were not subject to survey, Heritage NSW recommends that a thorough survey occur prior to Project approval.	The archaeological fieldwork component of this assessment was undertaken by OzArk and RAPs (or their representatives) in five stages (including a test excavation program) between July 2020 and January 2024. The survey methodology sent to RAPs for the Project was followed. The survey methodology stated (Revised ACHAR Appendix 3): <i>The field assessment will include:</i> • <i>Turbine locations. All proposed turbine locations will be assessed through full survey</i> • <i>Access tracks, existing unsealed roads in the Project Boundary and the 330kV ETL: sample survey will occur in areas with minimal disturbance and good ground surface visibility within landforms possessing Aboriginal archaeological potential, i.e. areas within 200 m of water, along ridgelines and crests, as well as areas of outcropping rock on slopes</i> • <i>All trees deemed to be of sufficient maturity to contain cultural modification within the Survey Boundary will be inspected. Care will be taken to inspect fallen or felled trees for signs of cultural modification</i> • <i>Some areas may not be physically surveyed if RAPs and archaeologists agreed they were too disturbed or possess a very low likelihood of sites.</i> The RAPs for the Project were very aware of the potential for Aboriginal objects to be located along ridges where the turbines are proposed, and large portions of this landform were surveyed. As required by the Code of Practice, the survey adequately characterised all landform types with the Survey Boundary. This included large areas of ridge lines and substantial portions of lower elevation landforms. This was achieved by pedestrian transects in the most part, or vehicle transects to ensure that the landform type was the same. In some cases, the team walked between turbine locations while the team member who was running the GPS with the survey tracks attempted to drive along the ridge to collect the team at the other end. Therefore, in the mapping shown on Figure 6-1 in Appendix 5 of the Revised ACHAR the dichotomy of pedestrian and vehicle transects is not strictly accurate minimal representation due to the real-world constraints of surveying in difficult terrain. The survey tracks are also those of one team member whereas there were an additional three members in each survey team (an archaeologist and two RAPs). Therefore, the actual survey coverage is greater than what is shown in Appendix 5 of the Revised ACHAR. Other linear features such as electricity reticulation lines or access tracks were surveyed by sample survey whereby the route was driven, and landforms of archaeological potential were surveyed on foot. Where these components crossed steep sloping landforms, both the archaeologists and the RAPs agreed that survey was not warranted, although all such slopes were visually inspected from a distance to ensure that there were no topographical features that required closer inspection. As often happens with large projects, the location of turbines was altered following the principal survey mobilisation for project/landholder reasons. In each case, the changes were examined carefully. If the turbine was shifted within the same ridge landform that had been surveyed, it was determined that the archaeological characteristics of that ridge were understood. Where the turbines were shifted to a ridge landform that was not previously surveyed, a renewed site mobilisation was initiated, and the ridge surveyed ((cf. Fieldwork Stages 3 and 5).	This table and revised ACHAR, in Amendment Report, Appendix G

Ref No.	Theme	Submission	Response	Where addressed
			It is noted that despite large areas of ridge landforms being surveyed no Aboriginal objects were recorded in these landforms as opposed to lower gradient landforms where a range of Aboriginal objects were recorded. This result provides confidence that ridge landforms in this area have low archaeological potential. The Revised ACHAR provides a comprehensive understanding of the archaeological potential of the Project Area, extensive surveys of ridge lines, and care taken by archaeologists to characterise the archaeological potential of all landform types as required by the Code of Practice. In total, there were 25 days of fieldwork consisting of 286 person days of survey and test excavation (including both OzArk archaeologists and RAPs) or 2,288 hours of assessment effort.	
Heritage NSW_6	Aboriginal Heritage – Assessment Methodology	Further justification is required on the designation of Green Range OS-3 with PAD as being of moderate significance. The ACHAR states that it is an exemplar site that contains potential contact archaeology (i.e., knapped glass), a large number of artefacts, and potential archaeology deposit (PAD).	Green Range OS-3 with PAD is assessed as having moderate scientific significance as it displays a range of tool types on the surface (including a knapped glass artefact) and a low density of artefacts apart from one isolated cluster in a subsurface context. The site is in a field that has been ploughed (presumably for some time) and the integrity of the site within the plough zone is diminished. Therefore, the site may have once had high scientific values, but because of the impact of ploughing, this has been reduced to moderate scientific significance.	This table
Heritage NSW_7		The ACHAR recommends surface collection of artefacts at Green Range OS-3 with PAD and Ranch OS-01 with PAD if they are to be impacted through the development. Consideration must be given to the impacts, both direct and indirect, that the development may have of the subsurface deposit associated with these sites. As standard practice, Heritage NSW requires the identification of potential archaeological deposits and the subsurface testing of those deposits to establish their nature, extent, and archaeological significance. As test excavations have not been undertaken as part of the EIS, the impacts to ACH values remain unknown. Testing upfront informs the potential of the project area to contain Aboriginal objects, whether future salvage excavation is required, and would allow the Applicant to redesign the Project to avoid any significant objects or sites if necessary. Without the completion of test excavations and significance yet to be established, the RAPs could not have provided informed consent.	The portion of the site within the road corridor is listed as one of the sites that will be harmed by the Project from road widening works along Winterbourne Road. A collection of surface artefacts from within the disturbed road corridor is recommended. The portion of the site within the adjacent ploughed paddock is outside of Project impacts but is at risk of harm from continued ploughing by the landowner. It is therefore recommended that this portion of the site be managed to conserve Aboriginal cultural values. The portion of the site within the ploughed paddock was subject to test excavation in 2023. The excavations demonstrated that Green Range OS-3 with PAD is essentially a surface manifestation with approximately 69 per cent of artefacts being recorded in the top-most 10 cm and only seven per cent being recorded at depths greater than 20 cm. As the test excavation demonstrated that intact subsurface archaeological deposits are not present at Green Range OS-3 with PAD, it is recommended that a prudent measure would be to record, collect, and relocate Aboriginal objects from the surface at within the southern, ploughed portion of Green Range OS-3 with PAD. Ranch OS-01 with PAD is a low-density artefact scatter of nine artefacts with potential archaeological deposit (PAD). However, the Applicant has undertaken to avoid the PAD extent through the design of the electricity transmission line. As the site will be avoided, it was not considered warranted to impact the site through subsurface investigations.	Revised ACHAR, Amendment Report, Appendix G EIS: Appendix O, ACHAR
Heritage NSW_8	Aboriginal Heritage – Assessment Methodology	As per Requirement 23 of Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) the recording of the site must be consistent with Aboriginal scarred trees in New South Wales, a field manual (DEC and Andrew Long 2005). As such, please provide a sketch of the tree and scar that includes the location and shape of scar, location of features (e.g., tool marks), and overall condition of the tree and scar.	Photographs of the two recorded scarred trees are provided in Figure 6.43 and Figure 6.45 of the Revised ACHAR. Each scar is described in Section 6.4 of the Revised ACHAR and a sketch of each scar completed during the survey is included in Figure 6.43 and Figure 6.45 of the Revised ACHAR.	EIS: Appendix O, ACHAR
Heritage NSW_9		Further explication is required on the determination of scarred trees as of low significance. Heritage NSW queries this determination owing to the rarity of such object across the region, its presence in largely cleared area, and as it is a non-renewable and dwindling aboriginal cultural heritage resource.	Neither site is a good exemplar of its type, and both were recorded as a precaution due to RAP interest in the trees. Tarwonga ST-1 appears to be too young to contain cultural scarring and Talisker ST-1 was noted in the ACHAR as being problematic. While good examples of scarred trees are becoming rarer in the landscape, the assessment of these sites does not warrant assigning them a higher heritage significance.	This table

Ref No.	Theme	Submission	Response	Where addressed
Heritage NSW_10		Greater explication and justification on the proposed lopping, capping, and potential removal of the scarred trees before Heritage NSW can assess whether the proposal is appropriate for the conservation of the objects. This must include: The details of other design options considered for the avoidance of harm and whether these were presented to the RAPs during consultation. If no alternatives were considered, justification is required as for why the only option for the development is for harm to this highly culturally significant Aboriginal object; Justification for the felling and relocation of a scarred tree rather than a redesign of the development to leave the tree in situ; Provide an assessment of relevant case studies that have employed similar methodologies for the conservation of scarred trees and the long-term effectiveness of these conservation measures; and Please provide detailed description of the long-term conservation and management of the scarred trees if they remain in situ or require removal.	The Applicant has undertaken to avoid Tarwonga ST-1. As noted above, the cultural origin of Tarwonga ST-1 is very problematic, however, the site will be protected during construction by temporary fencing and from longer-term inadvertent harm from electricity easement maintenance by the installation of permanent signage.	This table
Heritage NSW_11	Aboriginal Heritage – Aboriginal Cultural Heritage Management Plan (ACHMP)	The ACHAR recommends that an ACHMP be developed and implemented for the Project. Heritage NSW recommends the ACHMP should be included in the Conditions of Approval and that an ACHMP be created and approved by Department of Planning and Environment prior to any development activities occurring within the Project Area. Recommended conditions for an ACHMP have been included in Attachment B.	This comment is Recommendation 1 of the Revised ACHAR. This recommendation stipulates that the ACHMP will be developed in consultation with RAPs and Heritage NSW and approval will be sought from DPHI prior to any development activities occurring within the Project Area.	Revised ACHAR, Amendment Report, Appendix G
Heritage NSW_12		The ACHAR and ACHMP must take into consideration secondary impacts (e.g., road grading, road widening, public road upgrades, compaction, erosion) and long-term conservation options to areas of PAD, artefact sites, quarry, and stone arrangement within and adjacent to the Project Area. Avoidance of ACH does not denote its long-term conservation and protection. Provisions should include regular (e.g., annual, bi-annual) monitoring of the sites and if secondary impacts are present (e.g., erosion) then PADs should be subject to test excavations so that areas of conservation value and moderate to high significance are adequately avoided and protected.	All Project impacts have been considered in the ACHAR and it is not considered that impacts will extend beyond those discussed in the ACHAR. The nature of the Project as wind farm makes it difficult to recommend ongoing monitoring of sites out of impact, as the sites are located on land that is not owned or managed by the Applicant. While significant sites such as Queenlee OS-1 with PAD and Queenlee E-1 have recommendations for further research (with landowner permission), other recorded sites do not warrant further investigation beyond informing the landowner of their presence and protection under the NPW Act. The Project will consider funding additional research to take place at Queenlee OS-1 with PAD and Queenlee E-1 with landowner consent. The study will involve non-invasive recording, mapping, and photography at each site.	This table
Heritage NSW_13		If there is potential for the PADs to be impacted and/or extend further into the construction impact area, then Heritage NSW recommends test excavations to identify the nature, extent, and significance of any subsurface deposit. This will ensure that further impacts can be avoided, and the sites adequately conserved.	The portion of Green Range OS-3 with PAD that will not be harmed by the Project is within a frequently ploughed paddock. As the surface artefacts are at risk from continued impacts from ploughing, it is recommended that the site be managed through a collection of surface artefacts. As test excavation at Green Range OS-3 with PAD demonstrated, the site is largely a surface manifestation. A collection of surface artefacts will change the status of the site on the AHIMS register to ‘destroyed’.	Revised ACHAR Amendment Report, Appendix G

TABLE 4-12 DPE (NOW NSW DCCEEW) WATER SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
DPE Water_1	Water Supply and Use	The Applicant should confirm the requirement for new water supply works (e.g., bores or pumps) for the Project. If the works are required, it is recommended an impact assessment be completed to confirm the necessary yields and quality, and to address impacts on the water source and water users.	It is anticipated that water required for construction will be supplied mainly from groundwater bores (subject to water license permissions) or alternatively from an offsite local source (subject to approval). The Applicant will apply for and obtain all required water access approvals and entitlements prior to commencing groundwater extraction for construction.	EIS: Section 3.4.7
		Demonstrate the ability to access sufficient entitlement by identifying potential willing sellers or available entitlement to trade with.		
		Insufficient information has been provided to understand the ability to obtain relevant entitlements in the required water source. Clear demonstration is requested as obtaining these entitlements can be a risk to the Project. This can be shown through indications of landholders which are willing to trade, trading history in the source or controlled allocations.		
DPE Water_2		Quantify operational water take and its proposed source.	The Applicant estimates that approximately 50 megalitres (ML) of water will be required as a component of concrete for construction of wind turbine and transmission line footings and substation/switchyard concrete pads and approximately 350 ML of water be required for pavement construction for access tracks, hardstands and public road upgrades. Whilst the potential water demand for dust suppression may vary considerably depending on climatic conditions during construction, the Applicant conservatively estimates up to 300 ML of water required for dust suppression. This volume of water would be utilised over approximately four years of construction. It is expected that this water can be sourced from groundwater, subject to approvals, acquisition of entitlements and water quality testing. Small quantities of potable water will be imported for human consumption and cleaning at site construction compounds and the operations and maintenance building.	This table
DPE Water_4		The Applicant must ensure sufficient water entitlement is held in a water access licence/s to account for the maximum predicted take for each water source prior to take occurring unless an exemption applies.	Noted and included as commitments in Appendix B.	Updated Mitigation Measures, Appendix B of Amendment Report
DPE Water_6	Activities on Waterfront Land	The Applicant should demonstrate the Project has shown due consideration to the Guidelines for Controlled Activities on Waterfront Land.	The Project is SSD and is therefore exempt from requiring a controlled activity approval in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> .	EIS: Appendix P, Soil and Water Assessment
DPE Water_7		The Applicant should ensure works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land.	Regardless, the Applicant has and will continue to consider and apply, where relevant and practicable, requirements of these guidelines. Such commitments would be specified in relevant management plans.	
DPE Water_8		The Applicant notes that 3rd order and above watercourses within the site do not meet the definition of waterfront land under the Water Management Act 2000 (Section 6.8.3.3 of the EIS). This does not appear to be correct as many of these do show banks, flows and/or vegetation changes. All works within waterfront land should show due consideration to the Guidelines for Controlled Activities on Waterfront Land including setbacks, outlets and crossings. It is noted that if works are assessed as a part of the State Significant Development application, then a controlled activity approval would not be required.		

TABLE 4-13 DEPARTMENT OF PRIMARY INDUSTRIES (DPI) AGRICULTURE SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
DPI Agriculture_1	Recommendations (Economics)	The EIS describes Walcha as ‘sparsely populated’, a ‘predominantly rural landscape that has not been identified as significant or rare’ (6.3.4.7, p175). However: - The gross value of agricultural production was over \$131 million in Walcha, and Uralla \$50.2 million in 2021. Walcha is well-known for beef breeding and fattening enterprises and the merino sheep breeding industry, producing exceptional fine wool that is sought internationally. - Walcha has a higher livestock carrying capacity than most districts in NSW due to soil type, pasture management, rainfall, and high-altitude climate. The area is also relatively unencumbered by fragmentation for lifestyle development and land use conflict. - While the Project is not expected to disrupt agriculture, it would be useful for the EIS to demonstrate the importance of agriculture to Walcha and Uralla and reinforce the need to mitigate any impacts on communities and industries.	We consider that this statement does not consider all relevant context. In particular, the terminology quoted by DPI Agriculture is specific to the landscape and visual impact assessment and relates to the categorisation of the landscape in accordance with the Wind Energy: Visual Assessment Bulletin for State significant wind energy development (DPE, 2016) (Visual Bulletin). Regardless, the Applicant concurs that the Project Area and surrounds support significant agricultural production value. This is acknowledged and discussed in the EIS, particularly relating to cumulative impacts. Wind energy projects are not detrimental to agricultural production. The two practices can coexist. Importantly, the Project offers significant long-term benefits to agricultural production, both within the Project Area and broader community. These are detailed within the EIS. The submission acknowledges that the Project is not expected to disrupt agriculture, which was the conclusion reached in the EIS.	This table
DPI Agriculture_2	Recommendations (Land and Soils)	The EIS estimates there is approximately 325 ha of Biophysical Strategic Agricultural Land (BSAL) in Walcha LGA, with 22.5 ha being utilised in the development footprint and therefore removed from production potential for the life of the Project. It would be prudent to consider moving infrastructure away from BSAL given the scale of the Project and relative scarcity in the wider New England region.	There is a total of 347.6 ha of BSAL across the amended Project area. The amended Disturbance Footprint will overlap about 44 ha of BSAL; however, only 24% of this is within the permanent Project footprint. Therefore only 10.12 ha of BSAL will be permanently impacted. The areas of temporary impact will be rehabilitated and will be available for continued agricultural purposes through the operation of the Project. The agricultural potential of the remainder of BSAL within the Project area will remain the same. This land is currently used for grazing and these practices will not be impacted by the infrastructure as wind farms and agricultural production can coexist.	This table
DPI Agriculture_3	Recommendations (Visual)	It is suggested the photomontage on page 32 [Figure 3-1 of EIS] include images of the predominant agricultural landscape around Walcha and the Project site.	Photographs of the predominant agricultural landscape within the Project Area and surrounds can be found in the Landscape and Visual Impact Assessment (LVIA) (Appendix I of EIS), including the main volume of the LVIA, and Appendix B to Appendix D of the LVIA.	EIS: Appendix I, Landscape and Visual Impact Assessment
DPI Agriculture_4	General	We note the extension of the EIS submission timeframe to January 2023. Effort should be made to mitigate the issues arising in Walcha, for example workforce housing arrangements, CBF distribution, local procurement, visual impacts, use of water resources, disruption to transport routes, decommissioning and rehabilitation.	These matters have been further considered in the Addendum Social Impact Assessment provided in (Appendix J) and the Amendment Report. The Applicant has set a target of sourcing about one third of the construction workforce from within the Social Locality. The Addendum SIA concludes that if the remaining workforce are sourced from outside the Social Locality, there is sufficient capacity available in existing housing stock and in short term accommodation. The CBF will be managed by Walcha Council and Uralla Shire Council under a Voluntary Planning Agreement. The CBF will support local community initiatives and programs, non-profits and charities, and provide services and infrastructure in the Walcha and Uralla communities. The Amended Project involves the relocation of several turbines to reduce the visual impacts. In particular, visual impacts have been reduced to sensitive receivers surrounding the Project Area. The Project does not result in adverse visual impacts on the town of Walcha. The Amended Project identifies on-site groundwater resources for use during construction and negates the need for water supply from external sources and reduces the amount of construction traffic using local roads to transport water. An onsite quarry is also included in the Amended Project and will significantly reduce the amount of construction traffic on local roads as more raw materials will be sourced from within the Project Area. As stated underneath, the Project includes decommissioning and rehabilitation of infrastructure at the end of the Project’s operations.	Amendment Report and Appendix J, Addendum Social Impact Assessment

Ref No.	Theme	Submission	Response	Where addressed
DPI Agriculture_5	Decommissioning	In relation to decommissioning, we note the EIS refers to the removal of structures and infrastructure to 200mm below ground surface. NSW DPI requests that underground infrastructure is removed to a depth of 500mm to allow land to be used for agriculture post project retirement.	Section 3.9 Decommissioning and Rehabilitation of the EIS refers to the removal of structures and infrastructure to 500 mm below ground surface. Section 6.11.3.4 of the EIS incorrectly refers to the removal of structures and infrastructure to 200 mm below ground surface. The Project commits that when decommissioning occurs, all above ground structures not required for the ongoing agricultural use of the land, including the WTGs, transformer stations, and substation, will be removed and the land rehabilitated to ensure it can be returned to agricultural use. Below ground infrastructure will be removed to a minimum of 500 m below the ground surface and where required will be covered in clean fill material and topsoil prior to revegetation. Rehabilitated areas will be adequately graded to reflect the slope of the surrounding area and to mitigate the risk of soil erosion	EIS: Section 3.9 Decommissioning and Rehabilitation Updated Mitigation Measures, Appendix B of Amendment Report
DPI Agriculture_6	Recommendations (Land and Soils)	Walcha is part of the Namoi Regional Jobs Precinct, a government-led initiative investigating potential for further investment in intensive agriculture and value adding. Recent research shows that Walcha’s climate and location has potential to establish controlled environment horticulture and orcharding to complement existing extensive agriculture. This reinforces the unique agricultural conditions in Walcha and the importance of the area for food security, particularly in a changing climate.	Agricultural production can coexist with wind farms. The Project does not restrict the ability of host landowners to undertake controlled environment horticulture or orcharding on their property.	This table

TABLE 4-14 DPI FISHERIES SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
DPI Fisheries_1	Watercourse Crossings	The construction or upgrade of permanent or temporary access tracks, cabling, transmission line construction, roads and services upgrades across Key Fish Habitat should be in accordance with DPI Fisheries Guideline document: Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013). This is to ensure that the works are designed and constructed in accordance with best management practice to ensure fish passage and with minimal impact on the aquatic environment.	Noted and included as a commitment in Appendix B.	Updated Mitigation Measures, Appendix B of Amendment Report
DPI Fisheries_2	Riparian Buffer Zones	DPI Fisheries policy advocates the use of terrestrial riparian buffer zones adjacent to areas of Key Fish Habitat as per the Policy and Guidelines for Fish Habitat Conservation and Management (Update 2013) in order to maintain the riparian buffer zone and limit disturbance and susceptibility to bed or bank erosion.	Noted and included as a commitment in Appendix B.	Updated Mitigation Measures, Appendix B of Amendment Report

TABLE 4-15 AIRSERVICES AUSTRALIA SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
Airservices Australia_1	Aviation – Airspace procedures	- With respect to procedures designed by Airservices in accordance with ICAO PANS-OPS and Document 9905, at a maximum height of 1562.4m (5132ft) AHD, the wind farm will not affect any sector or circling altitude, nor any instrument approach or departure procedure at Armidale aerodrome; and - The wind farm will affect the following published air route LSALTs - W128 – this will need to be increased 200ft from 5900ft to 6100ft to accommodate. - The maximum height the Wind Farm can be within the assessment area of LSALT W128 is 1493 m (4900ft) AHD. - Note: procedures not designed by Airservices at Armidale aerodrome were not considered in this assessment.	Noted, and addressed in Table 6-34 Aviation Mitigation Measures of the EIS and included as a commitment in Appendix B.	EIS: Section 6.5.1 Aviation Safety EIS: Appendix K, Aviation Impact Assessment Updated Mitigation Measures, Appendix B of Amendment Report
Airservices Australia_2	Aviation –Communications / Navigation / Surveillance (CNS) Facilities	- This wind farm, to a maximum height of 1562.4m (5132ft) AHD, will not adversely impact the performance of any Airservices Precision/Non-Precision Navigation Aids, Anemometers, HF/VHF/UHF Communications, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links. - Based on the above assessment, our view is that the proposed wind farm would not have an impact on any Airservices designed instrument procedures, CNS facilities or ATC operations at Armidale aerodrome.	Noted.	EIS: Section 6.5.1 Aviation Safety EIS: Appendix K, Aviation Impact Assessment

TABLE 4-16 TRANSPORT FOR NSW (TFNSW) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
TfNSW_1	Transport Routes	Not all rail related infrastructure has been identified along the proposed transportation route/s from the Port of Newcastle. In particular it is noted that a road over rail bridge along the Oxley Highway, west of Surveyors Creek Bridge is not mentioned in either Section 5.4.3 of the TIA, the Route Survey or the Transport Route Map in Figure F6 in the TIA. It is unclear whether any other rail related infrastructure is missing from the assessment, which may be impacted by construction traffic of the development.	An Amended Traffic Impact Assessment has been prepared which provides an updated review of the transport route including identification of railway bridges along the route. It is no longer proposed to utilise Oxley Highway including Surveyors Creek Bridge for the transport of OSOM components. The relevant asset manager for the rail crossings has also been contacted to ascertain load ratings for relevant structures along the proposed transport route.	Appendix I: Amended Traffic Impact Assessment in Amendment Report
TfNSW_2		TfNSW notes, consultation was undertaken with TfNSW by the traffic consultants, Amber Organisation Pty Ltd in preparation for the EIS. In an email dated 24 June 2021, TfNSW highlighted the need for the development to undertake a formal review of the proposed transport route/s, in particular referring to the need to include bridge assessment/s. The email further advised that Rex J Andrews (RJA), OSOM transport consultants, were familiar with the process outlined for undertaking a formal review and assessment of the proposed transport route/s with TfNSW. However, this does not yet appear to have been undertaken as the (RJA) Route Survey notes that the capacity of each identified structure will need to be checked, and Section 5.4.1 of the TIA proposes use of an alternative route should the capacity of Surveyors Creek Bridge on the Oxley Highway be insufficient.	Rex J Andrews Pty Ltd, on behalf of the Applicant, contacted Transport for NSW to ascertain load ratings for relevant structures along the proposed transport route. All structures were deemed to meet the requirements for the transport of Project components. The Applicant is proposing an alternate transport route that eliminates the use of Oxley Highway for inbound OSOM movements. The proposed new route will travel along New England Highway until just south of Uralla at Staces Road. From Staces Road, a new road will be constructed through Crown Land which connects Staces Road to Thunderbolts Way.	Appendix I: Amended Traffic Impact Assessment in Amendment Report
TfNSW_3		The EIS, TIA and Route Survey all appear to rely solely on the OSOM route/s utilising the Oxley Highway to access the Project site for OSOM loads, yet present uncertainty regarding the viability of the proposed route/s to accommodate the loads transported to the Project site, furthermore not all relevant bridge / culvert structures along the proposed route/s have been identified.	As above, it is no longer proposed to utilise Oxley Highway including crossing Surveyors Creek Bridge for the transport of OSOM components. An alternative route is proposed via New England Highway, Staces Road and Thunderbolts Way.	Appendix I: Amended Traffic Impact Assessment in Amendment Report
TfNSW_4		TfNSW reiterates this assessment must be undertaken prior to determination to ensure the route/s are suitable to accommodate the proposed OSOM / HV loads being transported to site. Where the Preferred Access Route/s is found to be unsuitable, further assessment will be required for any alternative route/s.	Noted.	This table.
TfNSW_5		Figure F6 identifies Thunderbolts Way as a route between Walcha and the approximate location of the proposed switching yard, however does not show Thunderbolts Way as an access route to site for construction traffic coming from further north. This traffic is noted to include, approximately 50% of Light Vehicles transporting workers, 40% of the MRV/HRV and 30% of the Truck and Dog/AV/B-Doubles traveling to site from the Armidale and Uralla regions. Furthermore, no intersection assessment appears to have been undertaken at the key intersection of New England Highway & Thunderbolts Way. The TIA must be updated to clearly demonstrate ALL access routes to site, in particular from the key intersections of the classified (State & Regional) roads, further addressing traffic impacts at the key intersections along those route/s.	Additional surveys of Thunderbolts Way and New England Highway have been undertaken and are presented in the Amended TIA. The surveys and subsequent analysis indicate that each intersection modelled (refer Section 4.5.1 of Appendix I) is expected to operate with minimal queue lengths and delays on intersections and to operate at a Level of Service (LoS) A for all traffic movements during the peak construction period.	Appendix I: Amended Traffic Impact Assessment in Amended Report
TfNSW_6	Alternative Transport Routes	Although not directly proposed, TfNSW advise that any use of the Oxley Highway, East of Walcha will not be supported by TfNSW. This particular road corridor is prone to flooding, and hazards including land slips. It is currently undergoing significant rehabilitation works which may continue for several years, which may at times include single lane alternate flow, stop/slow, reduced lane / shoulder widths and the potential for road closures.	Noted, it is not proposed to utilise any section of Oxley Highway east of Walcha for project traffic.	This table.

Ref No.	Theme	Submission	Response	Where addressed
TfNSW_7		Alternative transport routes for OSOM and Heavy Vehicles via Kentucky and Uralla are mentioned in Sections 5.4.1 and 5.5 of the TIA, (bypassing the Oxley Highway). Each route is stated not to be the preferred route due to a variety of constraints, however none of these route/s are entirely discounted either. Furthermore, on occasion are used to suggest alternatives are available to the Preferred Access Route/s, if needed. These routes have not been sufficiently detailed in the TIA or Route Survey to be considered suitable viable alternatives, at this time. Further assessment is required if they are to be considered for this development.	The TIA included this route to show that the assessment had explored all options to arrive at the preferred transport route. This route will not be used.	This table.
TfNSW_8		A Tamworth Bypass route for Blade transportation, is detailed in both the TIA and Route Survey. This route is acknowledged to have a number of constraints, including being limited to a maximum of 25T. The proposed single piece 81m Blades are noted (in TIA Table 4) to have a mass of 28.1T, exceeding that maximum. It is unclear if this mass is for the blade component only or is inclusive of the specialist transportation vehicle’s weight. The proposal includes extensive traffic control & reversing manoeuvres to accommodate this route, in particular at the intersection of Whitehouse Lane & the New England Highway, south of Tamworth, and along Nundle Road between O’Brien’s Lane & the intersection at the New England Highway, East of Tamworth at Nemingha. The Route Survey (11.0 Route Survey 3: Alternative Route through Tamworth), appears incomplete in addressing the relevant impacts, timeframes and distances of particular reversing movements.	The Route Study provides an alternate bypass route for blade transport vehicles to avoid travelling through Tamworth and is considered feasible, though the nominated route is preferred.	This table.
TfNSW_9		Section 6.6 of the TIA states that there is potential for the construction period to overlap with the Hills of Gold Wind Farm. Further information is required to directly address the cumulative impacts of both wind farm development’s construction traffic occurring concurrently, in particular at the two identified intersections of the New England Highway and along Nundle Road. Further information is also required to further address any relevant pull over bays and / or procedures to enable the OSOM vehicles to wait, without blocking traffic, prior to traffic control processes being implemented to enable the proposed manoeuvres to occur.	The timing of the commencement of construction of Hills of Gold Wind Farm and Winterbourne Wind Farm is still unknown; however, the Amended TIA has included the potential for overlap of these construction periods to provide a comprehensive assessment of all possibilities. Should the construction period of these projects overlap the management and coordination of OSOM movements would be detailed in the Construction Traffic Management Plan. This has been included as a commitment in Appendix B.	Appendix B: Updated Mitigation Measures
TfNSW_9		TfNSW do not support the closing statement of Section 5.5, that the Tamworth Bypass will be further investigated prior to construction. Any route proposed to be included in any future consent, must address and identify any impacts on the classified road network, including the extent of works within the classified road reserve, which may require further consent and / or concurrence from TfNSW. Any associated environmental approvals are required to be identified & addressed prior to determination.	The Route Study provides an alternate bypass route for blade transport vehicles to avoid travelling through Tamworth and is considered feasible, though the nominated route is preferred. The Applicant has engaged with Neoen (developer of Thunderbolt Wind Farm), EnergyCo and TfNSW in respect of the alternate bypass route, and notes that EnergyCo supports development and use of the bypass for transport of components to projects in the New England Renewable Energy Zone.	This table.
TfNSW_10		Uncertainty remains regarding the viability of the Preferred Access Route/s via the Oxley Highway (from the New England Highway), in particular regarding, impacts to relevant road and rail corridors, the need to undertake bridge and culvert assessments and further details required for the proposed works at Surveyors Creek Bridge. Until such details are provided to confirm the viability of the Preferred Access Route/s, TfNSW require further investigations be undertaken and details be provided regarding the alternative access route/s to site.	As stated above, it is no longer proposed to utilise Oxley Highway for the transport of OSOM components. An alternative route is proposed via New England Highway, Staces Road and Thunderbolts Way.	
TfNSW_11	Swept Path	Swept Paths demonstrated in Appendix I demonstrate the concurrent swept paths for a 19m Articulated Vehicle (AV) only, however, the Project proposes to utilise a variety of Heavy Vehicles (HVs) including 19m Truck and Dog trailers and 26m B-Doubles. Swept paths must be updated to further demonstrate the concurrent inbound and outbound movements of both the largest design vehicle (B-Double) and the Truck and Dog (proposed to transport majority of materials to site) to identify any potential points of conflict at this intersection.	Swept paths have been updated and are presented and discussed in the Amended TIA. The swept paths show concurrent B-double movements as the largest design vehicles proposed to enter the Project Area. Truck and Dog trailers are at least 7m shorter than 26m B-Double design vehicles and therefore have a suitable level of access at each intersection.	Appendix J: Amended Traffic Impact Assessment in Amendment Report

Ref No.	Theme	Submission	Response	Where addressed
TfNSW_12	SIDRA	Throughout the TIA, in particular the Executive Summary, Appendix G and Appendix K, reference is made to SIDRA Analysis being undertaken, however, no SIDRA Outputs have been provided. Furthermore, Appendix K states that SIDRA has been undertaken for the intersection of Thunderbolts Way / Jamieson Street, but does not state that any other key intersections have been analysed. SIDRA Outputs are required to enable an appropriate assessment of the traffic impacts of the development at key intersections along the various	Additional surveys of Thunderbolts Way and New England Highway have been undertaken and are presented in the Amended TIA. The surveys and subsequent analysis indicate that each intersection is expected to operate with minimal queue lengths on all legs and the overall delay at each intersection during peak hours is minor. This modelling assessed the performance of the following intersections: • New England Highway and Oxley Highway; • New England Highway (Bridge Street) and Salisbury Street; • Fitzroy Street and Derby Street; • Thunderbolts Way and Darjeeling Road; and • Thunderbolts Way (Uralla Road and Derby Street) and Jamieson Street. • Based on the SIDRA modelling undertaken, all intersections analysed are expected to operate at LoS A.	Appendix J: Amended Traffic Impact Assessment in Amendment Report
TfNSW_13	Light Vehicles Trips and Carpooling	Table 9 in the TIA proposes 105 (one-way) peak hour Light Vehicle trips, with a further proposal to encourage carpooling among staff, at a rate of 4 people per car for a peak workforce of 400 workers. This rate although stated to be conservative, is rather high, and is without any evidence or strategies demonstrating how carpooling will be encouraged, implemented, mandated, or managed. Without this information, it is unclear how such rates would be maintained throughout the construction period of the Project, to ensure the volume of light vehicle trips, complied with the proposal. The traffic impacts of the development have been demonstrated based on this high light vehicle passenger rate scenario, rather than “worst case” scenario. If they cannot be maintained, the traffic impacts on the state road and key intersections may be greater than demonstrated.	An updated assessment of project traffic generation is provided in Section 4.2 of the Amended TIA. A vehicle occupancy of 2.0 people per car has been adopted to calculate staff traffic generation.	Appendix J: Amended Traffic Impact Assessment in Amendment Report
TfNSW_14		TfNSW recommends the development provide a Carpooling and Shuttle Buses Strategy further detailing how staff will be required to take up the option/s proposed. Where such a strategy cannot be provided to demonstrate processes and policies to comply with the proposal, further amendments to the TIA will be required to demonstrate the worst case scenario traffic impacts for light vehicle trips between their points of origin to/from site.	The Applicant has developed a carpooling strategy, which has been included in Section 9.2 of the Amended TIA.	Appendix J: Amended Traffic Impact Assessment in Amendment Report
TfNSW_15	Rail Corridor Impacts	The proposed excavation works at the Surveyors Creek Bridge location along the Preferred Transport Route/s, has the potential to impact the adjacent rail corridor. The proposed switchyard and associated Transmission Line corridor appear to be within close proximity to the rail corridor. Further information is required, which clearly identifies the relevant land parcels associated with the Project and specifies the distance of any proposed works to the rail network corridor. Works may require further assessment under Section 2.99 of the Transport and Infrastructure SEPP (Excavation in, above, below or adjacent to rail corridors).	It is no longer proposed to utilise Oxley Highway including crossing Surveyors Creek Bridge for the transport of OSOM components.	This table
TfNSW_16		Consultation is stated to have commenced and be ongoing with ARTC, in particular with regard to the Selwyn Street level crossing, however no details regarding this consultation was provided. Further evidence is required of this consultation, to understand the impacts identified, any mitigation measures proposed or works required.	Consultation with ARTC was undertaken during the preparation of the Amended TIA. Further consultation has been undertaken since the exhibition of the EIS. This is detailed in the Amended TIA. ARTC have indicated that the level crossing on Selwyn Street will require the attendance of a Rail Protection Officer for every crossing due to the length of the load and the timings of the level crossing not being set for longer loads.	Appendix J: Amended Traffic Impact Assessment in Amendment Report
TfNSW_17	Additional Roads	The Transmission Line Corridor is proposed to cross over Thunderbolts Way. Works crossing a classified (regional) road reserve will require Council to seek concurrence from TfNSW under Section 138 of the <i>Roads Act 1993</i> .	Noted.	This table

Ref No.	Theme	Submission	Response	Where addressed
TfNSW_18	Recommendations (works proposed at Surveyors Creek Bridge)	The development proposes undertaking significant works adjacent to Surveyors Creek Bridge, to accommodate the transportation of the proposed 81m Blades along the Oxley Highway. These include relocating fencing, removing armco (safety barriers), excavation into the roadside bank to allow for blade swing, and several signs to be relocated and /or made removable. The works proposed will require TfNSW consent and the developer will be required to enter into a 'Works Authorisation Deed' (WAD) with Transport for NSW, or other suitable arrangement as agreed to by TfNSW. However, TfNSW require additional information, regarding the proposed works, to ensure that any impacts of works on the classified road and rail networks are clearly identified & addressed prior to determination.	It is no longer proposed to utilise Oxley Highway including crossing Surveyors Creek Bridge for the transport of OSOM components.	This table
		It is recommended that the Consent Authority request the applicant to provide a scaled strategic design of the proposed works at Surveyors Creek Bridge addressing the below points for consideration, showing: - Plans, cross sections & long sections, demonstrating the full scope of works proposed. Including but not limited to: - All works are to be designed and constructed in accordance with the relevant Austroads Guidelines, Australian - Standards and related TfNSW Supplements. - The existing and proposed road geometry, lane and shoulder widths, line-marking & signage. - The proposed excavation (and / or fill) works. Including batter specifications for all excavation and / or fill - locations. - Removal of trees and safety barriers, relocation of utilities, stormwater management (new and existing), etc. - Dimensions of the proposed works to the adjacent rail corridor. - Accurate cadastral boundaries. - Any relevant pull over bays required to enable the OSOM vehicles to wait, without blocking traffic, prior to traffic control processes being implemented. - Specifications of Armco (safety barrier) removal, including details of any proposed replacement infrastructure to ensure the safety of other road users is not compromised outside of the OSOM transportation schedules at the subject location. - Swept path diagrams, for OSOM vehicles and associated loads. - Details of the bridge capacity, in regard to all OSOM loads proposed to access the site via the structure. - Note: The design needs to comply with TfNSW Strategic design requirements for DAs.	It is no longer proposed to utilise Oxley Highway including crossing Surveyors Creek Bridge for the transport of OSOM components.	This table
TfNSW_18		The proximity of the proposed works in this location to the adjacent rail corridor is unclear and may require further assessment under Section 2.99 of the Transport and Infrastructure SEPP (Excavation in, above, below or adjacent to rail corridors). Further details are required to: - Accurately identify the land parcels within the immediate vicinity of the works & any land acquisitions required to enable the proposed works to be constructed. - Identify and address any potential impacts to the rail corridor. - Demonstrate evidence of consultation with the relevant landholders impacted by the proposed works.	It is no longer proposed to utilise Oxley Highway including crossing Surveyors Creek Bridge for the transport of OSOM components.	This table

TABLE 4-17 WALCHA COUNCIL (WC) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
WC_1	The Project	Council is alarmed by multiple references throughout the EIS to terms and phrases that indicate the scope of the Project is not yet clearly defined and that the extent of its impacts are proposed to be determined at a later stage, including “conceptual”, “not yet been subject to detailed design”, “will need to be assessed” and “post approval”. The EIS must be definitive in relation to the scope of the proposal it is assessing and supported by a comprehensive suite of detailed documentation that enables an informed decision to be made by the consent authority. Delaying the provision of key information that relates to the full nature and extent of the proposal denies Council and the Walcha community an opportunity to understand the full extent of the proposal and its impacts and make meaningful submissions on the same.	An Amendment Report (ERM, 2024) has been prepared to support the development application for the Project. Appendix A of the Amendment Report includes an updated Project Description which details the design which has been assessed and is being sought for Project approval by the Applicant.	Amendment Report 2024: Appendix A, Updated Project Description
WC_2	Social – Neighbour Benefit Fund	No information addressing how any such ‘Neighbour Benefit Fund’ is to be established and implemented and by whom it will be managed has been identified.	An EIS Erratum Letter was issued on 7 December 2022 and is available on the DPHI Major Projects website noting that the original benefit fund proposals have been consolidated into a CBF to fund a broad range of projects and programs for the benefit of the community. On 24 August 2024, the Applicant, Walcha Council and Uralla Shire Council entered into a VPA for the Project. Refer to Section 3.3 of this Submissions Report for further detail on the VPA, including the CBFs to provide direct benefits to the Walcha and Uralla Shire LGAs.	EIS: Section 3.12 Community Benefit Fund
WC_3	Social – Workforce Accommodation	The developer states that ‘around 16 skilled and support staff will be permanently based in Walcha’. The validity of this statement is questioned, noting that based on Council’s knowledge and experience it is quite difficult to attract permanent staff to Walcha due to there being no rental properties within Walcha and surrounding areas. If it is the Applicant’s intention for staffed to be permanently based in Walcha, then the EIS requires further discussion about how this will actually be achieved in practice.	The Applicant has committed to developing a Procurement Policy to maximise local employment. Hiring preferences will be developed with priority given to applicants from within the Walcha Region who have suitable skills to undertake the jobs required for the Project. Prior to construction, a Workforce Accommodation Strategy will be prepared to manage impacts to local short and long-term accommodation arrangements in Walcha and surrounding towns.	Amendment Report 2024: Appendix L, Addendum Social Impact Assessment EIS: Appendix R, Social Impact Assessment
WC_4	Traffic and transport – Road upgrades and dilapidation	Council requests as a condition of any approval that may be granted for the Project, any infrastructure works (e.g., road upgrades or intersections) that may be mandated by the consent authority are to be the subject of a separate Infrastructure Agreement that the Applicant is required to enter into with Council.	The revised TIA and the Amendment Report provide additional information about required infrastructure works (e.g., road upgrades and intersections). Prior to the commencement of construction, the Applicant will undertake any road upgrades in consultation with the relevant road authority. A planning agreement under s7.4 of the EP&A Act is not necessary for road upgrade works associated with the carrying out the Project as the relevant road authority has powers to authorise these works under s138 of the <i>Roads Act 1993</i> .	Appendix I: Traffic Impact Assessment Amendment Report
WC_5		In the event that approval is granted for the Project, Council submits that a condition of consent should be imposed requiring the fund to be established prior to the issuing of any construction certificate in respect of the Project and prior to the commencement of works. Having regard to Council’s constrained ability to maintain and fund its current levels of service for the community, it is critical that an Infrastructure Agreement is required as a condition of any consent granted for the Project as otherwise any perceived or real benefit arising from the proposed CBF will be totally undermined by the damage to Council’s infrastructure caused by the Project.	The CBF is not intended to fund works to rectify any damage caused to the road network during construction. As stated in Section 10.0 of the Traffic Impact Assessment (Appendix J of EIS), a Traffic Management Plan will be prepared in consultation with the relevant road authorities to ensure impacts to the road network are minimised. A pre-condition survey of the relevant sections of the existing road network will be undertaken in consultation with Walcha Council prior to construction commencing. During construction the road network used by the Project will be monitored and maintained to ensure safety for all road users and any faults attributable to the construction of the Project will be rectified. At the end of construction, a post-condition survey will be undertaken to ensure the condition of the road network is consistent with or better than its condition at the start of construction.	This table
WC_6	Voluntary Planning Agreements	Council is of the view that separate VPA’s with both Walcha and Uralla Shire Council will be required. Walcha Council already has a number of Advisory Committees that are successfully operating in the Walcha LGA. Walcha Council would seek to create an Advisory Committee to distribute the proposed CBF on the same lines as existing terms of reference for existing Advisory Committees.	On 24 August 2024, the Applicant, Walcha Council and Uralla Shire Council entered into a VPA for the Project. Refer to Section 3.3 of this Submissions Report for further detail on the VPA, including the CBFs to provide direct benefits to the Walcha and Uralla Shire LGAs.	This table

TABLE 4-18 URALLA COUNCIL (UC) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
UC_1	Cumulative impacts	The impact on our Council and Community, including cumulative impacts from other projects in the New England Regional Energy Zone. The New England 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.	As stated in Section 3.12 of the EIS, a CBF is proposed to be established by the Applicant and will be managed by Walcha Council and Uralla Shire Council under a Voluntary Planning Agreement (under s7.4 of the EP&A Act). The VPA will document how the funds are to be administrated by Walcha Council and Uralla Shire Council including the establishment of a committee to provide recommendations for the allocation of funds. The funds will be split 90:10 between Walcha and Uralla Shire LGAs, as a reflection of the quantity of infrastructure in each LGA. Under Division 7.1, Subdivision 2 of the EP&A Act a planning agreement can be made between a developer and multiple planning authorities. The Applicant has committed to decommissioning the wind farm once it has reached the end of its operational life. This is discussed in Section 3.9 and Appendix S of the EIS. The Applicant has undertaken authentic and effective community engagement as detailed in Section 5 and Appendix D of the EIS. Cumulative impacts have been further considered in the Addendum Social Impact Assessment provided in Appendix J of the Amendment Report. The Applicant will investigate opportunities to enter a PPA with Council; however, given the relatively small electricity load it is expected that the legal and administrative costs of such an arrangement would be commercially unattractive for both parties. There are no carbon offsets generated or required by the Project and as such the Project is unable to purchase carbon offsets within the LGA. The EIS included an assessment of the potential for telecommunications electromagnetic interference. As a result of the assessment and engagement with NSW Telco Authority, several turbines have been relocated to avoid potential interference with point-to-point links. NSW Telco Authority has confirmed that they are satisfied with the assessment and subsequent avoidance, mitigation measures (see Table 4-5).	EIS: Section 3.12 Community Benefit Fund. EIS: Section 3.9 Decommissioning and Rehabilitation. EIS: Appendix S, Decommissioning and Rehabilitation Assessment. EIS: Section 5, Stakeholder Engagement. EIS: Appendix D, Community Engagement. Appendix K: Addendum Social Impact Assessment in Amendment Report EIS: Section 6.5.5, Electromagnetic interference. EIS: Appendix N, EMI Assessment.
UC_2	Traffic and transport Project construction	Failure to adequately address quantities, sources and transport routes associated with road base, aggregate and sound associated with road, hardstand and tower foundation construction. To meet council expectation the EIS must specify details: - source 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 of rock and aggregate extraction. This must involve: - 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; - a precondition survey before the Project commences and a postcondition survey to ensure the roads are effectively restored at no net cost the Uralla or Walcha councils; - an assessment of the transport route for the major components associated with the Uralla switchyard and batteries; - 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; - 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.	The Applicant has identified a suitable location for a quarry within the Project Area. This quarry will supply road base products required for creation of access tracks and hardstands, coarse rubble and crushed rock products required for drainage mitigation, and potentially aggregates for use in concrete batching. In addition, the Applicant has installed several groundwater bores and, subject to approvals and securing of water entitlements, expects to be able to source most of the water required for Project construction from onsite sources. The onsite quarry and groundwater bores will significantly minimise offsite transport movements required with materials sourcing for the Project. It is noted that the quarry would be built to supply material to the Project only and will be sufficient to meet the anticipated 1 Mt of materials over a 3-4 year construction period.	

Ref No.	Theme	Submission	Response	Where addressed
UC_3	Environmental management	The definition of mitigating measures in a qualitative rather than quantitative manner does not allow measurable monitoring of the mitigation measures. An organisation responsible for overseeing the mitigation measures that can define quantitatively the impact of the measures, should be specified in the documents along with specifications for the Applicant to near the financial responsibility for this oversighting.	An Environmental Management Strategy (EMS) will be developed to guide proposed activities associated with the construction, operation and decommissioning and rehabilitation of the Project. The EMS will build upon the mitigation measures presented in the EIS and will be developed to the satisfaction of DPHI. The EMS will be supported by relevant, aspect-specific sub-plans. Where relevant, mitigation will include monitoring to ensure the effectiveness of mitigation proposed.	Appendix B: Mitigation Measures and Commitments in Amendment Report
UC_4	Waste management	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. 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 handled 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.	A Waste Management Plan will be prepared to describe the measures to manage, reuse, recycle and safely dispose of waste. In accordance with best practice for waste management, a resource management hierarchy will be implemented which prioritises avoiding unnecessary resource consumption, followed by resource recovering and recycling and lastly disposal of waste. Vehicular movements for waste were included in the Transport Impact Assessment. A Decommissioning and Rehabilitation Plan will be prepared for the Project no less than five years prior to decommissioning and / or in accordance with any Project approval requirements. It is anticipated that the decommissioning and rehabilitation phase would take up to 18 months to complete, with the Project Area being returned, as far as practicable, to its condition prior to the commencement of construction.	Appendix B: Mitigation Measures and Commitments in Amendment Report EIS: Section 6.11 Waste Management EIS: Section 3.9, Decommissioning and Rehabilitation
UC_5	Decommissioning	Failure to adequately address the cost and responsibility for decommissioning. A decommissioning plan should be development 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.	A Decommissioning and Rehabilitation Assessment (DRA) was submitted with the EIS (Appendix S) and included an estimate for the decommissioning and rehabilitation costs. The DRA proposes that when the plant is decommissioned, the WTGs and associated infrastructure would likely be demolished (rather than dismantled) and then sold for scrap. The value of scrap metal is not insignificant. The analysis in the DRA demonstrates that the salvage value of scrap metal would be more than sufficient to offset the decommissioning and rehabilitation costs. In addition to the above, the Applicant has proposed the following measures to cover any potential future shortfall in the decommissioning cost: - Undertake an annual assessment of the remaining life of the Project, starting in Year 15 of operation; - When it is determined that the remaining economic life of the Project is less than 6 years, update the DRA to identify the expected decommissioning methodology and anticipated cost; and - If a shortfall (cost) is identified, establish a dedicated decommissioning reserve fund to cover the decommissioning and rehabilitation cost of the wind farm. This reserve will be established out of operating cashflows, with an appropriate percentage of cash generated by the wind farm directed into this reserve over an annual basis, until the reserve is fully cash funded, based on the most recent estimate of decommissioning and rehabilitation costs. The above mitigation measures are considered sufficient to ensure there are adequate resources available to cover the decommission costs.	Appendix B: Mitigation Measures and Commitments in Amendment Report EIS: Appendix S, Decommissioning and Rehabilitation Assessment
UC_6	Water resources	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. Either 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.	It is anticipated that water required for construction will be supplied from new groundwater bores. All required approvals and water entitlements will be secured prior to commencing groundwater extraction. Potable water for use in construction compounds and maintenance building will be delivered to site from offsite sources.	

Ref No.	Theme	Submission	Response	Where addressed
UC_7	Landscape and visual	Negative impact on visual amenity. 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 approved by CASA and could be utilised to lessen impact.	The location of different turbine types, densities, and layout geometry has been designed to minimise the visual impacts; however, wind farms do visually alter the landscape. Visual screen planting is a beneficial mitigation method used to assist in reducing the visual impact of the wind farm and ancillary infrastructure. In circumstances where residences are subject to a high level of visual impact, screen planting is an option proposed to assist in mitigating views of turbines from residential properties. Obstacle lighting of turbines and associated infrastructure has the potential to extend the visual effect of wind farms into the nighttime. The extent of the visibility of obstacle lighting is dependent on the intensity of the lighting, topography, vegetation coverage and climatic conditions. Although the Aviation Impact Assessment has not recommended obstacle lighting, if obstacle lighting was required to be installed on the turbines for the Project, then using a lower intensity 200 cd obstacle light would be preferable to the standard medium intensity 2,000 cd light commonly used for wind farms internationally. It is also preferred that obstacle lights use shielding design principles to restrict the downward spill of light to the ground plane, as follows: • No more than 5% of the nominal light intensity is emitted at or below 5° below horizontal; • No light is emitted at or below 10° below horizontal; and • Two lights must be provided on top of the generator housing in a way that allows at least one of the lights to be seen from every angle in azimuth. • With regards to night lighting associated with ancillary infrastructure, with the use of design principles consistent with the National Light Pollution Guidelines for Wildlife published by the Department of Environment and Energy (2020), Moir LA has assessed that it is unlikely to create a noticeable impact on the existing nighttime landscape. A further discussion of night lighting impacts and mitigation measures is provided in Section 12 of the LVIA (refer Appendix I of the EIS).	EIS: Appendix I, Landscape and Visual Impact Assessment Appendix F: Aviation Supplementary Assessment and Night Lighting Plan
UC_8	Historic heritage	Failure to adequately address significant heritage items. 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 examples, 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. The heritage report should include detail on affected items associated with European settlement.	The Salisbury Court Homestead is described on the State Heritage Register as facing to the north. As the item is approximately 1 km east from the proposed transmission line, OzArk has assessed that there will be no loss of cultural heritage values associated with this item. Transmission lines are generally considered common and acceptable features of a landscape.	EIS: Appendix O, Aboriginal Cultural Heritage and Historic Heritage Assessment Report.

TABLE 4-19 MUSWELLBROOK SHIRE COUNCIL (MSC) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
MSC_1	Project description – Traffic and transport	Use of Council local roads (as opposed to State roads) is a constraint caused by the Denman Road bridge crossing of the Hunter River (height limit restricted) and the Muswellbrook rail underpass on the New England Highway.	These constraints have been considered in the Route Survey included as part of the Traffic Impact Assessment. The proposed transport route does not cross the Denman Road bridge crossing of the Hunter River. The proposed transport route will bypass the township of Muswellbrook and does not involve use of the Muswellbrook rail underpass.	EIS: Appendix A, RJAs Route Assessment of Appendix J, Traffic Impact Assessment
MSC_2		Whilst some proponents have indicated they will utilize the older style short blades, and could technically utilize the State Road Network, Council is concerned that these projects will seek a future modification for taller towers and longer blades requiring the use of local roads for transportation through the Shire.	The Project is seeking approval for the Project as described in Appendix A of the Amendment Report (ERM, 2023). Any future modifications will be subject to a separate development application.	Amendment Report: Appendix A, Project Description

Ref No.	Theme	Submission	Response	Where addressed
MSC_3	Cumulative impacts – Traffic and transport	There has been no cumulative assessment of the various impacts this many OSOM movements resulting from planned and foreseeable future renewable energy projects will have on the assets, resources and community in Muswellbrook Shire. A cumulative impact assessment would employ an explicit methodology to model plausible future scenarios, understand the pathways of interaction of cumulative impacts and determine and describe thresholds and limits for traffic impacts. Many proposed development timeframes for the renewable energy projects appear to occur at the same time. Council’s concern is on the unsustainable use of local roads and bridges that are not fit for purpose, by numerous large-scale projects.	Cumulative traffic impacts have been assessed in accordance with the <i>Cumulative Impact Assessment Guidelines for State Significant Projects</i> (CIA Guidelines). Cumulative impacts to traffic have been addressed within the EIS and also within the Amended TIA (refer Section 4.4 of Appendix I of the Amendment Report) in accordance with the CIA Guidelines.	EIS: Section 6.14 and Appendix J, Traffic Impact Assessment. Amendment Report, Appendix I Amended Traffic Impact Assessment
MSC_4	Traffic and transport – Road dilapidation; Road safety	Road conditions are broadly described as a country road standard with narrow lane widths, unformed shoulders, poor pavement depths and lighting, aged-sealed surfaces, drainage structures that will not support repeated heavy loads/turning movements and road weight limits; and road gradients unsuitable for transport of long loads. Some roads have known accident history including fatalities (discussed below) and form part of local bus routes.	Public road upgrades would be required to cater for the delivery of blades, nacelles and towers, and include public roads in Muswellbrook Shire Council as documented in the Traffic Impact Assessment. It is possible that other projects using the local road network may undertake their own road infrastructure upgrades, therefore an updated site assessment in consultation with relevant road authorities needs to be conducted to identify the required road infrastructure upgrades dependant on the actual road conditions immediately pre-construction.	EIS: Appendix A, RJR Route Assessment of Appendix J, Traffic Impact Assessment EIS: Section 6.4.6 Traffic and Transport Mitigation Measures
MSC_5	Traffic and transport – Cumulative impacts; Road safety	The public are at risk of traffic related impacts from multiple projects i.e., cumulative road closures and cumulative OSOM movements (flashing lights and safety considerations). These roads and intersections form part of the designated access to coal mines and horse studs, carry high volumes of traffic at peak times and disruption can cause significant issues for these businesses.	The Project will prepare a detailed Construction Traffic Management Plan prior to construction in consultation with TfNSW, Muswellbrook Shire Council, other relevant roads authorities, and to the satisfaction of the Secretary of DPHI. The Construction Traffic Management Plan will include appropriate consideration of safety issues and matters and, at minimum, will incorporate the measures documented in Section 6.4.6 of the EIS.	Appendix B: Mitigation Measures and Commitments in Amendment Report
MSC_6		Coal mining occurs 24/7, with a change of shift every 10 to 12 hours, so any night time/early morning transport may impact on shift changes. Some of these roads are maintained by mining companies, and the mining operations are prohibited from using some of these roads (as terms of approvals) due to safety issues arising from poor alignment and weight limited structures.		
MSC_7		The Coroner has made several recommendations following a fatal car accident (decapitation) on Wybong Road between a light vehicle and an escorted prime mover. Key recommendations were in relation to OSOM travelling on narrow country roads.		
MSC_8		There are no direct benefits to the ratepayers of Muswellbrook Shire (e.g., Employment opportunities) and yet ratepayers are at risk of: • funding costs associated with the accelerated deterioration of the local road network and staff time required to create legal agreements and monitor impacts. Escorting OSOM and repair of any damage or removal and reinstallation of road furniture will come at great cost to Council; • the inconvenience of temporary road closures. Council Officers recommend that this impact could be minimised by extra widening of corners to reduce the number of turning movements required to allow OSOM vehicles to negotiate them; • safety issues of encountering large numbers of OSOM vehicles on local roads; • associated with the accelerated deterioration of the local road network and staff time required to create legal agreements and monitor impacts. Escorting OSOM and repair of any damage or removal and reinstallation of road furniture will come at great cost to Council; • amenity impacts for residents of traffic noise, flashing lights and other unfavourable impacts, particularly if night movements are proposed; and • diversion of police resources to escort duties.		
MSC_9	Traffic and transport – Road dilapidation	If approved, every project Applicant would need to enter into a Deed of Agreement and Maintenance Agreement with Council. Significant bank guarantees would be required to enable Council to undertake maintenance work to roads in the likely scenario that none of the Applicants accepts that their transportation effort caused the damage to the roads. Muswellbrook Shire ratepayers should not pay for the staff time and resources required for this.	A Construction Traffic Management Plan will be prepared in consultation with the relevant road authorities.	This table

Ref No.	Theme	Submission	Response	Where addressed
MSC_10		Every load would need to be escorted by Council staff and regular dilapidation reports sought so that damage is identified within an appropriate timeframe and able to be apportioned to a particular Proponent.	All project loads will be transported in accordance with relevant roads authority requirements, including permits and pilot escorts as necessary. It is not considered necessary for Council staff to also escort Project vehicles through Muswellbrook Shire Council. A pre-condition survey of the relevant sections of the existing road network be undertaken. During construction the sections of the road network used by the Project will be monitored and maintained by the Applicant to ensure continued safe use by all road users, and any faults attributed to construction of the Project will be rectified by the Applicant. At the end of construction, a post-condition survey will be undertaken by the Applicant to ensure the road network is left in a consistent or better condition as at the start of construction. Should multiple projects be using the Muswellbrook Shire Council road network to transport wind farm components at the same time, the Applicant will coordinate as necessary with other developers.	This table
MSC_11	Traffic and transport – Road upgrades	Widened intersections would need to be designed to avoid other road users “cutting corners” and speeding excessively through newly widened areas.	Noted for further discussion Muswellbrook Shire Council during preparation of the Construction Traffic Management Plan and Section 138 permits.	This table
MSC_12		As significant upgrades will be required to these roads, their asset value will change and Council maintenance costs will increase to reflect the new standard e.g. 8 m wide road compared to a 5.5 m wide road. Furthermore, the newly upgraded roads may encourage use by motorists who would normally access the shire via the State Road network (e.g., a short cut between Sandy Hollow and Scone).		
MSC_13	Cumulative impacts – Traffic and transport	The Mining Industry have indicated they do not support a project-by-project approach where each Proponent seeks individual landholder agreements (mining companies own a significant amount of land on the transport route).	The Project is continuing to work with private landowners, EnergyCo, Transport for NSW, and other developers to identify appropriate transport solutions through Muswellbrook Shire Council.	This table
MSC_14		Some areas of land are under long term lease agreements between mining companies and landowners. The proposed transport route will mean a permanent resumption of land as access would be required not only for the Project construction period, but also if blades needed to be replaced or more turbines are added in a staged development.		
MSC_15		A strategic solution to the transport of over-dimensioned equipment on local roads has not yet been proposed to ensure all issues are being captured and a practical and workable solution for Council, wind farm proponents and mining companies and other landowners is identified. A strategic approach would benefit the community by improving safety, reducing the number of consultations/negotiations for access over private land and by undertaking upgrade works once, not several times depending on the component size of each wind farm.		

Ref No.	Theme	Submission	Response	Where addressed
MSC_16		Council Officers have consulted with EnergyCo, TfNSW and DPE (now DPHI) regarding Council's concerns for more than 12 months, the most recent correspondence received from DPE (now DPHI) on 15 February 2022, on behalf of the Minister of Energy and Environment, stated: • "EnergyCo is committed to working with Council to ensure impacts on the road network throughout the Muswellbrook LGA are appropriately managed and a coordinated approach to this issue is developed. • EnergyCo and Transport for NSW have already commissioned a road access study to identify the constraints on the road network between Newcastle and the Central West-Orana and New England REZs. • The study will be completed in the near future and... the consultant has been asked to consider impacts on local road networks and include recommendations for addressing these issues. • EnergyCo will seek to engage further with Council on these important matters once the study has progressed". • EnergyCo briefed Council's SSD Committee on 21 November 2022 and held a meeting with Council Officers on 28 November 2022 to discuss Council's objection. This meeting indicated work is underway to identify possible solutions but is not finalised.	Council's comments are noted and are taken to relate to the broader strategic industry discussions currently being held with EnergyCo, TfNSW and DPHI. As stated above, the Project is continuing to work with private landowners, EnergyCo, Transport for NSW, and other developers to identify appropriate transport solutions through the Muswellbrook LGA.	This table
MSC_17		It is Council's preference that the CWO REZ and HNE REZ have continuous State Road access from the Port of Newcastle to the 'last mile' before the project destination. Requests to re-classify Council local roads has been forwarded to TfNSW - a formal response has not been provided. Council's preference is also for single route option utilising a limited number of roads for all blade and tower components rather than impacting a greater number of roads including roads through residential areas: a) To the north via the planned Muswellbrook Bypass. Until this is constructed, Council Officers would prefer Golden Highway, Denman Road, Bengalla Link Road, Wybong Road East and Kayuga Road. b) To the west via the Golden Highway. It is Council's preference that if local roads are used, that roads are upgraded to "purpose built" to minimise maintenance costs over the long term. Council is eager to be involved in a strategic plan/approach so that issues raised would be adequately addressed and the objection removed.		

TABLE 4-20 CITY OF NEWCASTLE COUNCIL (CON) SUBMISSION RESPONSES

Ref No.	Theme	Submission	Response	Where addressed
CoN_1	Traffic and transport – road dilapidation	According to the RJA Route Study, modifications including hardstand are required at the intersection of the Mayfield #4 berth access road and Selwyn Street. Concern is raised regarding impact on CN's SW infrastructure in the locality. Culverts/channels must remain open for SW conveyance. Localised widening is proposed on the southern side of George Street, between Selwyn Street and Industrial Drive. Concern is raised regarding the potential damage to CN's stormwater infrastructure caused by the heavy vehicle turning paths. It should be noted that CN would seek financial compensation for any damage to the SW assets resulting from the proposed traffic movements. The triangular median between George Street and Industrial Drive may have unmapped SW assets/incorrectly mapped SW assets. The proposed hard stand works are directly over a SW pit and could be over unmapped lines. The George Street sign pole proposed to be removed is near CN's SW pipes and therefore care is required in its removal and reinstatement to ensure that the above pipes are not damaged. An electronic copy of a dilapidation report prepared by a suitably qualified person for both pre and post works and will be required to be submitted to CN prior to the commencement of any of the proposed works on public roads. The report is to document and photograph the structural condition of the roads and infrastructure. In regard to stormwater infrastructure, the report is to include the condition of internal and external pits lintels, stormwater pipes via CCTV and kerb & gutter. The CCTV inspection is to comply with Appendix 11 of the CN Technical Manual 'Stormwater and Water Efficiency for Development' (Updated April 2019). It is recommended that prior to the drafting of the Response to Submissions Report the Applicant consult with CN's Assets Coordinators to discuss the above concerns. Prior to the meeting the Applicant should undertake a utilities search including locations of all underground CN stormwater pipes, in addition to all other private / public utilities in this area [DRAFTING NOTE: ACTION].	CoN's position regarding damage to infrastructure is noted. The transport route has been surveyed and it is not expected that any damage to CoN's stormwater infrastructure will occur. However, to mitigate any potential impacts, the Applicant will: - Undertake a utilities search as part of detailed design for the Project after the transport and logistics contractor is engaged and the turbine technology is selected. - Take steps to avoid impacts to CoN's stormwater infrastructure as much as practicable. - Undertake a site inspection with CoN's engineers prior to any works being undertaken on public roads in the Newcastle LGA. - Obtain Section 138 permits from CoN for any road modifications required on public roads, as necessary. - Provide 48 hrs notice to CoN prior to any works being undertaken on public roads. The Applicant will provide an electronic copy of a dilapidation report prepared by a suitably qualified person for both pre and post works to be submitted to CoN prior to the commencement of any works on CoN's public roads, unless otherwise agreed with CoN. The Applicant will repair or pay the costs of any damage to public infrastructure caused by the Project.	Appendix B: Mitigation Measures and Commitments in Amendment Report
CoN_2	Traffic and transport – road dilapidation	No objections are raised to the removal and reinstatement of signs, line marking and medians on Selwyn Street and George Street, subject to the above concern regarding SW pipes being addressed. The hardstand area and fence relocation proposed on the eastern side of the access road from the #4 berth at Port of Newcastle are on Port of Newcastle Lessor Ministerial Holding Corporation land. It is noted that the turning movements of the heavy vehicles will encroach onto the southern alignment of Selwyn Street which will necessitate the relocation of the boundary fence onto Transport for NSW (TfNSW) land. A separate application must be lodged by the applicant and consent obtained from City of Newcastle (CN) for all works within the road reserve pursuant to Section 138 of the <i>Roads Act 1993</i> (NSW). The consent must be obtained, or other satisfactory arrangements confirmed in writing from CN, before the issue of a Construction Certificate for the development. The proposed widening of George Street will also require the prior consent of TfNSW before any approval granted by CN because of its likely impacts on Industrial Drive which is a State road and the traffic signals. TfNSW approval of a Road Occupancy Licence (NSW Transport Management Centre) and Works Authorisation Deed agreement is required as works involve their assets (e.g., median, traffic signals) for all roads in the Newcastle LGA except for Selwyn Street and George Street. For the information of the Department and the applicant a table identifying the responsible regulatory authority for the proposed road upgrades and traffic management measures is attached (Refer to Attachment A).	Noted. Approvals will be sought from the relevant road authorities prior to works commencing. The Applicant will provide an electronic copy of a dilapidation report prepared by a suitably qualified person for both pre and post works to be submitted to CoN prior to the commencement of any works on CoN's public roads, unless otherwise agreed with CoN. The Applicant will repair or pay the costs of any damage to public infrastructure caused by the Project. The Applicant will remove any hardstand areas erected for the Project on CoN's public roads following the completion of the transportation of the WTG components, if required. The Applicant will pay for the cost for the roads to be restored to pre-works condition to the satisfaction of CoN, if required.	Appendix B: Mitigation Measures and Commitments in Amendment Report

Ref No.	Theme	Submission	Response	Where addressed
		The proposed hardstand areas on the public roads will be required by CN to be removed following the completion of the transportation of the wind turbine components, at no cost to CN and to the satisfaction of CN. As mentioned above, an electronic copy of a dilapidation report prepared by a suitably qualified person for both Pre and Post works is required for Selwyn Street and George Street including level crossing infrastructure and signage.		
CoN_3	Traffic and transport – road safety	From a traffic safety perspective, the proposed measures are supported in principle subject to the following: • The proposed hardstands are not to involve any changes to the line marking on the road so that the existing arrangement of travel lanes remains the same. • Where roads are significantly widened and do not possess edge lines, edge/centre lines are to be provided. • ‘No Stopping’ restrictions to be provided along the proposed hardstands to prevent vehicle parking on these areas for the duration of their required use. • For removable/sleeved signposts security head bolts are to be used to affix posts. • The 'oversized and over mass' routes are only to be used during the nightttime. More specific details in this regard will be provided by the NSW Police Force.	Noted and included in Section 12 of the Amended TIA	Appendix B: Mitigation Measures and Commitments in Amendment Report
CoN_4	Traffic and transport – road upgrades	The proposed modifications are to avoid vegetation removal. Any proposed removal of street trees will not be endorsed by CoN.	The Transport Route Survey does not identify any vegetation which needs to be removed within the City of Newcastle LGA. An updated site assessment in consultation with relevant road authorities will be conducted to identify the required road infrastructure upgrades dependant on the actual road conditions pre-construction.	EIS: Appendix A ‘RJA Route Assessment’ of Appendix J ‘Traffic Impact Assessment’

5. RESPONSE TO PUBLIC SUBMISSIONS

As outlined in **Section 2.1**, a total of 924 submissions were received from the public, and a total of 14 submissions were received from the community organisations. Due to the overlap in the submissions from individuals and interest groups, responses to these submissions are categorised by issue as set out in **Section 2.3**.

Community submissions received, both in support and objection, had similar themes, and therefore most of the responses detailed below relate to multiple submissions. Dedicated section headings are provided for overall theme topics. Examples of specific quotes from the submissions are provided for each theme to provide further context regarding the issue raised. Example quotes that were provided by an interest group are highlighted as such. Submissions of support for relevant themes are highlighted in blue.

5.1 PROJECT JUSTIFICATION AND EVALUATION

5.1.1 CLIMATE CHANGE, GREENHOUSE GASES AND ATMOSPHERIC CHANGES

One of the main themes of support for the Project was the benefit the Project would have towards reducing greenhouse gas emissions and minimising the impacts of climate change. Some of these submissions are highlighted below.

Submitter ID	Example Text from Submission
[Holly Fletcher]	"Regional Australia, and our rural community depends on the environment for our income and our livelihoods, meaning, when compared to our city cousins, we have become disproportionately impacted by climate inaction. ... if we achieve our emission reduction targets, we will see a reduction in climate change impacts ... [and] those benefits will be observable at regional levels, meaning we, the people in the bush will see a direct return on taking a lead role in tackling climate change ... what better legacy to gift our children and grandchildren."
SE-51490210	"A project of this scale will significantly contribute to the nation['s] emission reduction targets in the battle against climate change. A NSW goal is to have 50% reduction in greenhouse gas emissions by 2030 (relative to 2005 levels) and as I understand it, are nowhere close to that. This project alone will contribute approx. 3% towards that target."
SE-53789254	"NSW urgently needs significant new zero emissions electricity capacity of the scale of the Winterbourne Wind Farm."
SE-53789254	"As one of the largest wind farm developments in NSW, and one of the largest such developments in planning in the Southern Hemisphere, the Winterbourne Wind Farm proposal is of key national strategic interest to help Australia deliver on our international treaty obligations, the Paris Agreement and ensure Australia delivers our fair share of the decarbonisation efforts as illustrated by the modelling by the IEA."
SE-53709743	"The NSW goal is to have a 50% reduction in greenhouse gas emissions by 2030 (relative to 2005 levels) and we are far from achieving this. This large project alone will provide about 3% of the reduction required to achieve this goal. As described in CSIRO's annual generation cost report, wind energy is far cheaper than new fossil fuel generation whilst also reducing emissions to near zero. The closure of Liddell Power Station this year and the largest generator in NSW (the 2,880MW Eraring Power Station) in 2025 mean that there is an urgent need to build new generation now. Wind projects like Winterbourne Wind provide the fastest and cheapest way of delivering this new replacement generation."

Submitter ID	Example Text from Submission
SE-52724969	"I support renewable energy projects in general, and am in support of this project in particular. It is of great significance and urgency to replace coal-fired plants in Australia for a resilient grid and to slow climate change."
SE-51482457	"I fully support our country moving away from fossil fuel[l]ed economy and moving towards 100% renewables. I have seen the benefits the renewable industry brings to the local communities, and I have seen the destruction and pollution, along with the bad health effects burning fossil fuels has done to my friends and families. We need to have a sustainable future for our children and a mixture of renewables, pump hydro and battery storage is the future, I do not support nuclear as there is no solution for the waste."
SE-53451052	"There has been research which found that wind turbines produce a warming effect in the areas surrounding the turbines. This warming is the result of wind turbines actively mixing the atmosphere near the ground and aloft while simultaneously extracting from the atmospheres motion."

Based on the amended Project description and the current generation mix in NSW (DCCEEW, 2023), the Project would abate an estimated 1.5 million tonnes of CO₂^e per year, which is a significant contribution toward Australian, NSW and global emissions reductions requirements. The Project would also minimise the risk that the operating life of NSW existing coal fired power stations needs to be extended to meet NSW power demands.

Research on wind farm impacts on surface air temperatures suggests temperature increases in certain scenarios; however, these are unique and not widespread. A study by Baidya Roy & Traiteur (2010) demonstrated that utility-scale wind farms can significantly affect near-surface air temperatures. However, the study was limited to observations of WTGs with 23-m-tall hub heights in California, and simulations of 100-m tall hub heights using atmospheric data from the western United States. Baidya Roy & Traiteur (2010) acknowledged that the data was sourced from regions likely with naturally low background atmospheric boundary layer (ABL) flow which facilitates rotor wake turbulence to a degree that increases near-surface air temperature. This is supported by studies conducted by Porté-Agel *et al.* (2011) and Porté-Agel *et al.* (2014).

Moravec *et al.* (2018) observed a utility-scale wind farm in the Czech Republic over five months to measure near-ground air temperatures and showed no stable effect on such temperatures by WTGs. The local environment was suggested to have a similar or greater effect on temperatures than wind farms including the effect of background ABL flow, hence the importance of WTG siting.

Vestas, as a global leader in WTG design including rotor technology and WTG siting, has used extensive site data and their experience to appropriately site WTGs within the Project to avoid or minimise impacts to the local climate.

5.1.2 ALTERNATE TECHNOLOGIES

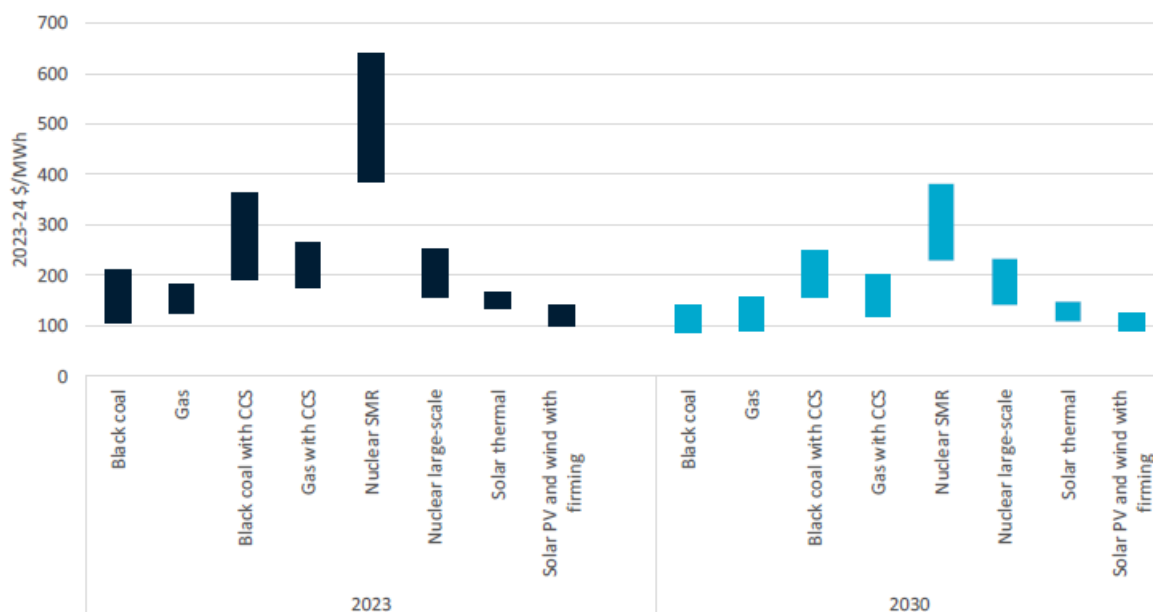
Submitter ID	Example Text from Submission
SE-53818479	"We look at these [E]uropean companies who have developed these new technologies. Like small modular reactors. They are 16.4m high, 4 metres wide and the city of Leeds in the UK, has a population of 503,000 people. What are you going to choose. Wind Factories or a 16.4 metre high x 4 metre wide, small modular reactor? It is not rocket science. Another technology is mic[r]o reactors - the size of two coffee tables. This technology is here. It is not being developed. We need to look at this technology and look at the long term damage that these wind turbines, will bring long lasting effects to our community. And wind energy is not our only alternate. We need to be making good decisions as we diversify our renewables."
SE-53410484	"I do NOT want a wind farm in the New England area. This is a beautiful region and the proposed wind farms will have immediate and future devastating environmental impacts on this area. The damage they will cause is irreversible. Surely the future for sustainable energy must be by nuclear power"
SE-53820729	"Why buy into near obsolete European technology, if there is an opportunity to be truly innovative?"

The Applicant is a global leader in the design, manufacture, development, installation and service of wind energy and hybrid energy projects across the world. The Applicant has installed more than 179 gigawatts (GW) of wind turbines in over 88 countries, abating more than 1.9 billion tonnes of CO₂ that would have otherwise been emitted into the atmosphere.

The Applicant does not support small scale nuclear energy as an alternate energy source. The technology is neither proven nor cost effective. Multiple analyses prepared by credible scientific and policy organisations have demonstrated that variable renewable energy is the lowest cost form of generation, even when transmission and integration costs are included. **Figure 5-1** shows the estimated levelised cost of electricity (LCoE) by technology and category for 2023 and 2030, as estimated and presented by CSIRO in its GenCost 2023-24 report (May 2024). This demonstrates the LCoE of nuclear small modular reactors is significantly more than variable renewable energy.

Section 5.3 provides a justification for why the Winterbourne site is perfectly suited for wind energy. Progressive design iterations for the turbine hardstands, ancillary infrastructure, and the transmission line corridor have considered minimising and avoiding environmental and social impacts in line with the Avoid-Minimise-Mitigate-Offset design hierarchy. **Section 5.3** also highlights the significant benefits that will come from the Project. These include delivering renewable, low-cost electricity, contributing to emissions reduction targets, creating a range of social and economic benefits, and substantial capital investment in Walcha and the broader New England region.

FIGURE 5-1 CALCULATED LCOE BY TECHNOLOGY AND CATEGORY FOR 2030 (CSIRO, 2023)



5.2 ECONOMIC, ENVIRONMENTAL AND SOCIAL IMPACTS

5.2.1 SOCIAL AND ECONOMIC

5.2.1.1 LOCAL ECONOMY, EMPLOYMENT AND LOCAL BUSINESS

Submitter ID	Submission Extract
SE-53811462	"Local councils should embrace the opportunities that these projects will provide for the council, for local businesses, for tourism, and for local jobs."
SE-51451713	"The project will bring many benefits to the Walcha District which has had no new industry established for the last 45 years. This project will provide opportunities for local businesses to prosper, it will provide job and apprenticeship opportunities as well as opportunities for tourism."
SE-53849468	"Local businesses will benefit from increased spending by workers."
SE-53811462	"We also support the project to help arrest Walcha's population decline."
SE-54206730	"Chance to enable a small town to attract businesses and achieve the growth that will enable the children of the town to remain here in employment."
SE-53168215	"Walcha has an aging population with a low socioeconomic status and urgently requires another viable industry to save our town from dying and give our youth a future."
SE-53624208	"Walcha has an ageing and declining population ... While some businesses in Walcha are currently prosperous there are number of businesses in Walcha that are not thriving ... The permanent operational and maintenance jobs will also contribute to Walcha's economy and community."

Submitter ID	Submission Extract
SE-53817707	"In reality (and based on information shared by other small, rural communities who have been through this process) it is unlikely there will be many local jobs during construction and even fewer (if any) in the longer term. This project and others like it are already causing, and will continue to cause, community division, destroying the vitality of what makes Walcha, 'Walcha', and a strong and resilient community."
SE-53820457	"More jobs will in turn increase the cost of living, housing affordability and availability, divide the tight-knit community in two, damage our roads and fill the town with itinerant workers who are not invested in creating a life and building relationships."
SE-53472758	"The 400 jobs to be created during the construction phase will likely be filled by outside employees, as Walcha does not have a large enough employment pool and local businesses are already struggling to find suitable staff. These extra people and their families coming to Walcha will put extreme pressure on a housing market that is already struggling to meet demand and especially in rentals."
SE-51696970	"We feel another community implication of these projects will be an increase in rental prices due to the temporary influx of a commuting contractors. This in return will leave those in the community already struggling to pay rent to be pushed out."
SE-53473505	"Walcha already has a limited rental housing market. Many people wish to move to our town, however there are no houses to rent. Increasing the workforce in town by 400 people, not including their families will greatly add to the strain of Walcha's rental market."
SE-53472758	"Whilst the construction phase will bring employment, it is likely to drive wages up to a point where local businesses cannot compete. As a result, many local businesses will go broke either due to paying exorbitant wages, or not being able to employ people to do the work required. Once the construction period is over, there will no longer be any local businesses left to employ people."
SE-53714818	"I rely on the availability of casual and contract staff to run my business. If staff are employed in the construction of this industry, as promised to the numbers stated by the developer, then that may create a undersupply of workers for my business. This means I will have no help or have to pay exorbitant rates for workers to travel from afar. This will negatively impact the sustainability and/or the profitability of my business and add to my stress of earning an income."

The Project will generate up to 400 full time equivalent (FTE) jobs during construction. This will create approximately \$150 million in direct wages and profits, and more than \$160 million in indirect wages and profits, per year of construction (estimated up to 4 years) (Section 5.1, Addendum Social Impact Assessment (SIA); Appendix J of the Amendment Report). This not only creates direct employment opportunities for locals but has other direct benefits in generating and supporting local and regional employment opportunities, which in turn will boost the local, regional and NSW economy.

The construction workforce will spend locally within Walcha, Uralla and regional centres, generating higher economic activity at local restaurants, shops, and businesses over a period of up to 48 months. Their presence in the region will also lead to higher occupancy rates in temporary accommodation.

The Applicant is committed to hiring locally where practicable and has established a target to draw about one third of the construction workforce and all the operational workforce from the surrounding local area.

Operation of the Project will require a range of skills including engineering, trades (electrical, mechanical, construction), operators and administrative staff. Approximately 16 long-term service and maintenance jobs will be created during Project operation to be based in the Walcha area.

The social and economic Study Area for the project includes the Walcha, Uralla Shire, Armidale Regional and Tamworth Regional LGAs. Across that study area population is forecast to grow modestly by +0.5% per year from 2020-2036; however, the Uralla Shire and Walcha LGAs are forecast to have population declines over that period (DPE State and Local Government Population Projections, 2019). Projects such as the Winterbourne Wind Farm will invest significantly locally and would generate new employment opportunities for residents and help to diversify income streams for local farmers.

The Project will also increase procurement opportunities for local goods and services as there will be significant opportunities for local contractors and businesses to supply services during Project construction and operation. WinterbourneWind will set up a mechanism for local businesses and services to register their capabilities and interest in working with the Project. They will also engage regularly with business chambers and regional businesses to inform them of goods and services required for the Project.

During construction, WinterbourneWind will monitor labour, goods and services metrics to understand shortages and competitive pressures that may arise due to the Project and actions which can be taken to limit these pressures. Mechanisms to manage the social and economic benefits and impacts that may result from the Project will be detailed in a Procurement Policy. The Procurement Policy will be prepared prior to commencement of construction and in consultation with relevant stakeholders (NSW DPHI, Walcha Council, Uralla Shire Council, business chambers, and regional businesses).

At the time of construction, if there are pressures which cannot be managed in relation to the availability of contractors, workers, and housing, WinterbourneWind will consider staging the construction of the wind farm.

WinterbourneWind has committed to implementing a CBF, which will provide direct benefits to the Walcha and Uralla Shire LGAs. The CBF will be used to fund projects within the Walcha and Uralla Shire LGAs that benefit those communities. This is discussed further in **Section 5.2.1.2.**

5.2.1.2 COMMUNITY BENEFIT FUNDING

Submitter ID	Example Text from Submission
SE-53709743	"Community Benefit Fund ... would be one of the most generous in NSW for the size of the project."
SE-53163723	"All the sporting clubs in town will benefit from the Community Fund – what a fantastic initiative to give back to the community! Imagine what else the fund could do for the community – new bike/walking paths, heated swimming pool, turf hockey court, netball courts, upgrade the indoor hockey court, new sheds for the rugby boys, upgrade the soccer field amenities. The list is endless."

Submitter ID	Example Text from Submission
SE-53168215	"What a wonderful opportunity for our town with good management from Council to reduce inequality in our community by providing increased educational opportunities through scholarships and sponsorships and support our youth to have a better future. Who knows we may be able attract doctors, nurses, teachers, vets, sportspeople, and much needed tradespeople to Walcha with this fund."
SE-53513459	"The Community Benefit Fund will inject much needed funds into Walcha community services ... [and] will lead to better quality projects and improved amenities for all – not just landholder turbine hosts."
SE-53588457	"The contribution of the Project to the local community fund will provide funding to enhance local sporting sponsorship opportunities, infrastructure upgrades and assistance to struggling local service organisations."
SE-53617712	"Walcha Council is struggling financially to survive on its own and it would be a fabulous financial boost. An injection of money for the community would help fund organisations and the people of Walcha ... There would be a constant flow of money coming into the town particularly while construction is happening. Extra income for local businesses, particularly food and accommodation providers. For us as landowners it will help us keep our property in the family and make succession planning easier with a financial backing."
SE-53716711	"The reason I think it should go ahead in Walcha is because a small town like ours needs this kind of financial boost for its ongoing security in the years moving forward. The money that will come into this community will help fund small sporting groups, new infrastructure, community grants and scholarships and will also provide the local council with more money through increased rates for the ongoing maintenance of our roads and parks."
SE-53472758	"Walcha has a current rate income of approximately \$20 million, which will increase to just over \$30 million with the Special Rate Variation that council has adopted. This means, the community benefit fund to Walcha will be 2% of the rates income. I hardly think this meagre income is worth the interruption and road damage caused by the project."
SE-53779457	"I was sorely disappointed, that despite initial promises from Vestas and Winterbourne Wind, a Neighbour Benefit Fund will not be provided. In some cases, neighbours will live closer to these turbines and have a more direct line of sight than the actual host landholders. These neighbours deserve to be compensated."
SE-53385460	"The removal of the Neighbour benefit scheme - where Neighbours are paid for the inconvenience of the wind turbines destroying their way of life and devaluing their land. It seems it was just a play to get the neighbours to sign confidentiality agreements to get the project to its current spot. What else will be removed? The community benefit fund? It appears we have no guarantees if this project goes ahead."
SE-53743977	"Walcha supports a population of 2000 people and yet we are being expected to absorb the social and environmental impacts of a massive energy project, and the community will only see 5% per annum of an expected earnings of \$420 million annually in energy sales. Also how to do spend the community fund in an equitable way that benefits everyone in the community?"

On 24 August 2024, the Applicant, Walcha Council and Uralla Shire Council entered into a VPA for the Project. Refer to **Section 3.3** of this Submissions Report for further detail on the VPA, including the CBFs to provide direct benefits to the Walcha and Uralla Shire LGAs.

DPHI has recently released a Draft Benefit Sharing Guideline as part of its updated Draft Energy Policy Framework. The Draft Benefit Sharing Guideline specifies that total funding for benefit sharing for a wind farm should be \$1,050 per MW per annum over the life of the Project, indexed to CPI. The contributions offered by the Applicant, Walcha Council and Uralla Shire Council exceed this proposed amount in the Draft Benefit Sharing Guideline.

It is also noteworthy that a high volume of submissions received in support of the Project cited the wide benefits and support for the community benefit funding.

Several submissions raised that the CBF will not adequately cover the cost of potential damage to roads resulting from the Project. Maintaining and repairing damage to local roads caused by construction and operation of the Project is managed through EIS commitments and conditions of consent.

Alternate fund options, including a Public Benefit Fund and a Neighbour Benefit Fund, were originally considered by the Applicant. However, based on discussion with Walcha Council, Uralla Shire Council and other stakeholders, these options have been consolidated into CBFs for each local council as described in Section 3.12 of the EIS. This approach is set out in an EIS Erratum Letter, which was issued on 7 December 2022 and is available on the DPHI Major Projects website.

5.2.1.3 TOURISM

Submitter ID	Example Text from Submission
SE-53588457	"...this project may encourage new forms of tourism."
SE-53788459	"It will provide a new industry in the area, with local jobs and spending, a benefit to local business and the community, not to mention an increase in tourism as evidenced by similar projects in similar town located in the New England."
SE-53816226	"Finally I would simply like to say that Wind turbines look amazing and provide a beautiful yet effective alternative to coal. I would even go as far to say that such beauty will even further help the tourism industry of Walcha."
SE-53739720	"The two main industries in Walcha are Tourism and Agriculture both of which would be negatively impacted by the project."
SE-53361707	"High volumes of traffic, increased requirement for road works and massive vehicles carrying oversize loads are not only a huge concern for those living on the major roads to construction sights, but also to the entire community of Walcha... Additionally, these conditions will significantly impact the tourism desire for Walcha, which is a significant factor for many businesses within Walcha."
SE-53617994	"Our tourism sector will suffer as some of the proposed turbines border on the National Parks, which is one of the most beautiful wilderness areas in the world."
SE-53461963	"Walcha Council has worked hard for decades to put Walcha town and surrounds on the tourism map. It is a popular destination for hiking, trout fishing (award winning Green Gully Track) camping, bike riding and exploring. Residents take pride in the community. It has magnificent uninterrupted views, 230m high turbine structures will have a detrimental affect on tourism."

There is little academic evidence that the presence of wind farms has a significant negative economic impact on the tourism industry in rural localities (Shannon, 2021); however, stakeholder concerns about turbine placement, visibility and noise must be taken seriously. Several assessments undertaken to inform the EIS considered potential impacts (positive and negative) that the Project may have on tourism. This included impacts that may affect the general social wellbeing of Walcha and surrounding districts, but more specifically impacts that may be perceived within the Oxley Wild Rivers National Park.

Shannon (2021) demonstrated that while community sentiment suggested apprehension toward wind farms with respect to their impacts on tourism, there was no evidence to suggest this was the case. In fact, evidence suggests that wind farms attract more tourists as points of interest, and that most tourists have positive feelings about wind farms (de Sousa and Kastenholz, 2015).

While a *fear* of negative tourism impacts from wind farms is often a common theme in submissions received during public exhibition, empirical evidence suggests the opposite is true. Smith *et al.* (2018) and others have shown that wind turbines may act as minor attractions because of their physical appearance, largely their 'modern design', 'eco-image' and 'uniqueness'. Wind farms have also been incorporated into the rural tourism industry, offering educational experiences relating to industry and technology and environmentalism.

In an Australian context there is less evidence about how wind farms impact tourism largely because the wind energy sector in Australia is comparatively young compared to that overseas. Regardless, several publications report that in Australia wind farms have an overall positive impact on local tourism (CEC, 2018). For example, Codrington Wind Farm in Victoria is reported to attract 50,000 visitors each year and has a dedicated on-site tourism operator. Other industry blog posts claim that Australian wind farms are popular tourist attractions with many local tourism businesses providing, for e.g., guided tours, viewing platforms, walking trails, visitor centres and organised events. A unique example of this is the Woodlawn Wind Farm (NSW) annual fundraising 'Run with the Wind' event.

Regardless, the Applicant has assessed and, where necessary, avoided or minimised potential impacts to landscape values and tourism attractions in the vicinity of the Project. The Landscape and Visual Impact Assessment (LVIA) prepared to inform the EIS (Moir, 2022; Appendix I of EIS) demonstrated that the high landscape quality and areas used for recreation and tourism within Walcha and surrounding districts would remain intact when the Project is operational. The report further identified that regionally significant landscape features would remain dominant features of the landscape and the Project is unlikely to degrade the scenic value of these landscape features. The LVIA assessed potential visual impacts associated with the Project from within Oxley Wild Rivers National Park and found there were no views of the Project at campgrounds and tourist attractions within the national park such as Apsley Falls. The LVIA also demonstrated that views toward the Project from walking trails in the national park would be significantly limited. The design has been further refined since EIS exhibition, and an Addendum LVIA prepared which demonstrates that impacts to significant landscape features and tourist attractions has been further avoided or minimized.

Similarly, the Noise Impact Assessment assessed the potential for noise impacts at campgrounds and tourist attractions in the Oxley Wild Rivers National Park. Noise levels were benchmarked against the Noise Policy for Industry criteria for National Parks of 50 dB(A). The noise levels within the national park for the exhibited Project would be 40 dB(A) or less at areas commonly used, such as walking trails and at lookout locations. The Amended NIA has modelled the revised Project layout. The predictions for the amended Project are similar or lower at the National Park. It is noted that the Draft Wind Energy Guidelines Technical Supplement for Noise Assessment (DPE, 2023) sets a 50 dB(A) limit for noise within National Parks.

5.2.1.4 PROPERTY DEVALUATION

Submitter ID	Example Text from Submission
SE-53681494	"The potential to devalue landholder's capital asset is of major concern."
SE-53645760	"There is no clear indication of the effect upon land values as a result of the project. it is however clear that there will be some form of impact, if we did want to sell our property it is undeniable that the presence of the wind towers on neighbouring properties and within 3.1km of the home will adversely effect the pool of potential purchasers and therefore in turn effect a resale price."
SE-53774731	"I have grave concerns about land valuations in the future being affected if the development goes ahead without any compensation for those that are affected by the noise, visual and contamination issues of the wind turbines."

Several submissions were received raising concern that the Project would adversely impact the value of their property. This has been a common theme raised in community consultation for this Project, and for most wind energy projects throughout NSW and Australia.

There have been several independent studies commissioned to investigate if wind farms affect the values of nearby properties. Early Australian studies such as that commissioned by the NSW Valuer General (2009) were limited in available data but concluded that wind farms do not appear to negatively affect property values. An earlier study, specifically focused on properties around Crookwell Wind Farm, assessed 78 property sales between 1990 and 2006 and found that there was no reduction in property values attributable to the wind farm.

This theme is common in more recent Australian studies, which concluded that, for e.g., 'the available data does not demonstrate that wind farms significantly impact the property values of rural properties used for agricultural purposes' (Urbis, 2016).

Other reports suggest mixed outcomes based on a property's underlying land use (Parliament of Australia, 2013; Brinkley & Leach, 2019; Abashidze & Taylor, 2022); however, the authors noted in most cases that planning processes such as setbacks are designed to avoid such situations.

It is acknowledged that data on wind farm impacts on property values in NSW is limited. Overseas studies may be used as a guide; however, the underlying sentiment regarding wind farms may be different in many overseas locations, particularly where wind farms have been a prominent feature of landscapes for several decades. It is also important to note that property values are influenced by a range of macro- and micro-economic, social and other factors.

A recent NSW Valuer General Report on rural property values in the Northern Tablelands Region (encompassing Armidale Regional, Glen Innes Severn, Inverell, Tenterfield, Uralla and Walcha) states that rural property values across the region rose 11.2% in the 12-months from July 2019 to July 2020. Several developers were actively investigating wind farms across the region during this period of double-digit property value increases, with many of these in the later stages of planning approvals.

5.2.2 TRANSPORT AND TRAFFIC

5.2.2.1 ROAD MAINTENANCE AND UPGRADES

Submitter ID	Example Text from Submission
SE-51219207	"Walcha Council will benefit from road reconstruction and road upgrades and may have access to new gravel quarries."
SE-53738974	"Transport links surrounding this project will require upgrading, as both the New England and Oxley Highways are in disrepair but with the economic benefits this project will bring, improved transport infrastructure will have a flow on effect to so many other businesses."
SE-53714010	"Continued investment in wind generation in the New England REZ will provide further impetus to upgrade the poor state of the New England Highway. As more heavy transport uses the New England Highway to construct wind projects, developers and the community will expect an improvement to this link. Improvements to the highway will not only ensure wind generator components are not damaged in transport, but ensure safety to other road users."
SE-53178457	"Our roads will be damaged which will increase our taxes and rates to repair them. These roads were not meant for such traffic and heavy trucks."
SE-51426457	"Roads will be destroyed in the process of development."
SE-53847007	"...there will be a large amount of traffic, travelling on the Oxley highway Walcha Township and the rural Walcha Roads, as a result of the project. I am concerned about the wear and tear on the roads and the risk to motorists. Who will be responsible for the extra wear and tear. Councils can not keep up with the damaged pavements now."

To facilitate construction of the Project, the Applicant has committed to upgrading several local roads within the Walcha LGA:

- Widening local roads to provide a minimum carriageway width of 6.2m with shoulder width of 0.5m and additional shoulder widening as per swept path requirements on any curves. Such upgrades may be required on Emu Creek Road, Winterbourne Road, Bark Hut Road, Blue Mountain Road between Winterbourne Road and Hazeldean Road, Uruga Road, Table Top Road between Florida Road and Site Entrance 6 (including bridge bypass), Florida Road, and Rowleys Creek Road.
- The first 1.2 km of Bark Hut Road will be sealed to mitigate potential noise and dust impacts at dwelling SR058, subject to discussion and agreement with Walcha Council.

While the transport movements associated with the Project may result in additional wear and tear to the road network, WinterbourneWind has committed to rectify any defects to the road network attributed to the Project. This commitment includes:

- A pre-condition survey to be undertaken prior to construction;
- Monitoring and maintenance of the road network used by Project construction vehicles during construction to ensure continued safe use by all road users;
- Any faults to the road network attributed to the Project will be rectified; and
- A condition survey at the completion of construction to ensure the road network is left in a condition consistent with or better than its state at the start of construction.

These management measures will ensure that the road network is maintained in a safe condition for all road users. Repairs to road damage caused by the Project will be the responsibility of WinterbourneWind, not Council, and therefore the Project's potential impacts on road condition will not lead to an increase in Council taxes or rates.

A Construction Traffic Management Plan (CTMP) will be prepared prior to construction which will include the commitment to and details of regular dilapidation surveys and reporting to ensure the road network is kept in a safe condition. WinterbourneWind will undertake the repairs or pay the cost of any repairs to remedy damage to public infrastructure caused by the Project.

As detailed in **Section 4**, the Amended Project includes an onsite quarry which has been developed primarily to supply capping material for access tracks and hardstands. In addition, subject to further testing, the quarry may be able to supply a portion of aggregates for use in concrete and crusher dust which can be mixed with sand and used as cable trench bedding material. The Applicant has also installed on-site groundwater bores and is in the process of seeking approvals and water entitlements for approximately 800 ML of water from these bores to provide water for construction and dust suppression purposes over a period of about 4 years. The onsite quarry and onsite groundwater bores will dramatically reduce heavy vehicle movements associated with bulk water and aggregate material deliveries and therefore significantly reduce impacts to the local road network.

5.2.2.2 TRAFFIC VOLUMES AND SAFETY

Submitter ID	Example Text from Submission
SE-52968716	"I am worried about the impact of an additional 588 construction vehicles on the roads, as the roads are not built either for the volume or the weight of this traffic. The road to Bendemeer is a mountainous winding road that is not built for overtaking, as there are very few opportunities for this to occur. This additional traffic will make the road unsafe, as well as impeding our trips to an important service town."
SE-53427476	"I am concerned about this because it will affect any travel plans and timings. I am more concerned about the safety in this area to pedestrians, as well as vehicle traffic. I am also concerned about the safety of animals in the area that are disturbed by heavy vehicles."
SE-53361707	"Those living on these roads such as Oxley Highway, will have their daily commutes significantly impacted as once quiet and safe roads are transformed into highways swarming with oversized, slow vehicles, encouraging unsafe driving and overtaking from commuters. Those living on these roads will have their safety compromised, as well as spending significantly more time on the road, and less time with their families and for relaxation."

Submitter ID	Example Text from Submission
SE-53459789	"The congestion of main roads and public services will delay people's functioning in the community for local residents and tourists travelling to and from the community due to larger scale trucking and industrial vehicles developing these wind towers. All of the main roads will have to be replaced with more government spending."
SE-53720460	"There will be 376 extra vehicle movements through Walcha via the Oxley Highway...there is limited ability to overtake safely on the Oxley Highway"
SE-52859212	"Our right as local residence to expect access to medical and emergency services will be impeded by the amount of traffic during the construction phase and consequent damage to roads. It already takes an hour to reach specialist medical services in Tamworth."

Since exhibition of the EIS, the Applicant has amended the Project in several ways that directly reduce potential traffic and transport impacts, including:

- Development of an onsite quarry to supply capping material for access tracks and hardstands and potentially aggregates for concrete and bedding material for trenches;
- Inclusion of onsite groundwater bores expected to supply around 200 ML of water per year, subject to completion of licencing and acquisition of water entitlements; and
- Revised the proposed transport route to avoid OSOM vehicles on Oxley Highway.

The inclusion of an onsite quarry, and the ability to use onsite water sources, will significantly reduce heavy vehicle movements associated with the transport of capping material (gravel) and water to site. This has reduced the expected heavy vehicle movements by 172 per day.

The proposed transport route for OSOM movements has also been modified in response to submissions received during the public exhibition of the EIS. The proposed use of the Oxley Highway for inbound OSOM vehicles from the intersection of the New England Highway has been removed. This removes safety and traffic concerns associated with large vehicle movements on narrow sections of Oxley Highway between Bendemeer and Walcha.

OSOM movements will instead maintain course on the New England Highway north along the following route:

- New England Highway right turn onto Staces Road south of Uralla;
- Transit Staces Road, crossing at the intersection of Staces Road and Racecourse Road onto a new road to be constructed across Crown Land (Lot 7300 DP1157667);
- Right turn from new road onto Thunderbolts Way; and
- Thunderbolts Way to Jamieson Street in Walcha.

This route will not only avoid inbound OSOM movements along Oxley Highway to the west of Walcha, but also remove inbound OSOM movements along Saleyards Road and Darjeeling Road.

It is proposed that unescorted outbound transport vehicles will utilise Oxley Highway on the return trip to the Port of Newcastle. No road upgrades are expected to be required for these outbound vehicles since they will no longer be considered OSOM loads. Escorted outbound OSOM vehicles will return to the Port along the same route used to deliver inbound loads to the site (i.e., via Thunderbolts Way to the new road south of Uralla, then along Staces Road and then south along the New England Highway).

The Traffic Impact Assessment (Appendix J to the EIS) and Transport Route Assessment (Appendix A of the Traffic Impact Assessment) assessed the volume and load capacity of the proposed transport route. The strength of bridge and culvert structures along the proposed transport route were obtained from Transport for NSW (TfNSW). All structures were assessed as having more than adequate load ratings for the proposed transport movements. Further analysis is required to determine where the bridge on Emu Creek Road will have adequate capacity for the transformer vehicle.

OSOM and heavy vehicle movements associated with the Project will be managed according to a CTMP. The CTMP will be prepared prior to the commencement of construction, in consultation with TfNSW and will detail the requirements for OSOM and heavy vehicle escorts, including where police escorts are required, and specific safety requirements.

The CTMP will detail mitigation and management measures which aim to minimise the impact of construction traffic and to ensure road and pedestrian safety. This will detail key safety initiatives including:

- Traffic signage (temporary signage within Walcha during construction, general posting to access roads, and specific warning signs);
- Carpooling program to reduce the daily light vehicle trips to the Project Area;
- Specific on-site safety measures, including access;
- Scheduling heavy vehicle deliveries outside of peak travel times (where possible);
- Driver protocols;
- OSOM vehicle operating protocols;
- Key information relating to road safety to be provided to all staff;
- Consultation with neighbours and local authorities regarding delivery of OSOM plant;
- Regular dilapidation reports to be provided to ensure the road network is kept in a safe condition; and
- Suitable signage provided to advise road users.

The Applicant or its contractors will be responsible for obtaining all required approvals and permits from TfNSW and local Councils and for complying with conditions specified in the approvals.

5.2.2.3 TRANSPORT ROUTE

Submitter ID	Example Text from Submission
SE-53709743	"The transport route has avoided the centre of Walcha by using periphery roads that currently host three large transport and haulage companies."
SE-51452754	"Oversize, overlength trucks with their accompanying vehicles will hold up traffic in each direction, wherever they go, whether the New England Highway, Oxley Highway, Thunderbolts Way and all the smaller roads to traverse till they reach their destination. This will impact everyone in the community especially first responders e.g. police, fire, SES, ambulance etc, and the local people trying to get to medical appointments, work, or simply around Walcha etc."
SE-52198207	"Transport of everything needed for a windfarm will create huge disruption not just to normal traffic, but also the first responders in an emergency e.g. police, fire, SES, ambulance and so on. All these movements will also impact our community's own normal and necessary transport e.g. transport of stock, fertiliser, other farm needs School buses, necessary trips to medical appointments and so on. For this district to operate successfully, it is vitally important that freight services are maintained and not held up by the windfarm transports. Our roads will be compromised, and though the developers say they will fix the roads who will decide if or when, and, indeed, how much fixing is necessary?"
SE-52859212	"Our right as local residence to expect access to medical and emergency services will be impeded by the amount of traffic during the construction phase and consequent damage to roads. It already takes an hour to reach specialist medical services in Tamworth, how much longer with travel time be? Will there be blocked roads, particularly along the Oxley Highway when these huge trucks are hauling these turbines and blocking both sides of the road?"
SE-53178457	"That is 3yrs of road holdups which will impact on emergency vehicles, congestion on the roads that were not built for so many and sized vehicles, stopping people from getting to work, they will turn away tourists who will not want to be sharing the road with the trucks. Our roads will be damaged which will increase our taxes and rates to repair them. These roads were not meant for such traffic and heavy trucks... ...Major highways like New England and Oxley will be congested which will affect tourism and commerce and emergency vehicles. I know I was greatly disadvantaged when the turbines were constructed near Glen Innes as I had holdups on the Moonbi Mountain which stopped me getting to work. These construction companies have no right to take over our roads."
SE-53192243	"I am worried about the impact of traffic on our small, rural roads that are not made for heavy vehicles or the quantity of traffic that we are to expect. I am worried about the impact this will have on cyclists, pedestrians, school buses, and general traffic. I think this will lead to dangerous situations and accidents."
SE-53316492	"It concerns me what delays we will experience when trying to go anywhere. This access also serves the local preschool and I can only imagine the inconvenience and disruption this will cause parents and children using this service. I have also become aware that the EIS does not make mention of the Walcha Preschool. The school bus to Armidale stops to collect children on the corner of Jamieson Street and Uralla Road and I hate to think what impact the construction traffic will have on this service as well as the local school bus service which travels on the Uralla Road passed Darjeeling Road to collect children morning and afternoon."
SE-53355228	"One of the reasons this will affect the community is the large amount of traffic coming and leaving Walcha, this will greatly impact the people who come and go from Walcha as their daily routine to go to work or just to get the groceries. these trips will double or more intine. Furthermore, there are children that travel to and from school and these trucks driving through Walcha will just add another hazard to these children."

Submitter ID	Example Text from Submission
SE-53361707	"Those living on these roads such as Oxley Highway, will have their daily commutes significantly impacted as once quiet and safe roads are trans[f]ormed into highways swarming with oversized, slow vehicles, encouraging unsafe driving and overtaking from commuters."

The proposed transport route for OSOM movements has been modified in response to submissions received during public exhibition of the EIS. The proposed use of the Oxley Highway from the intersection of New England Highway for inbound OSOM vehicles has been removed. OSOM movements will instead maintain course on the New England Highway north along the following route:

- New England Highway right turn onto Staces Road south of Uralla;
- Transit Staces Road, crossing at the intersection of Staces Road and Racecourse Road onto a new road to be constructed across Crown Land (Lot 7300 DP1157667);
- Right turn from new road onto Thunderbolts Way; and
- Thunderbolts Way to Jamieson Street in Walcha.

It is not expected that passing facilities will be required on the New England Highway or Thunderbolts Way to facilitate OSOM movements.

Other approved and/or proposed wind and solar projects (e.g., Thunderbolts Wind Farm, Hills of Gold Wind Farm) are likely to undertake road upgrades for their projects. As such the road upgrades required for the Project will be assessed again closer to construction commencing and in consultation with road authorities.

The Applicant is proposing an alternate transport route that eliminates the use of Oxley Highway for inbound OSOM movements. The proposed new route will travel along New England Highway until just south of Uralla at Staces Road. From Staces Road, a new road will be constructed through Crown Land which connects Staces Road to Thunderbolts Way.

Table 6-31 (Transport and Traffic Mitigation Measures) of the EIS has committed that when aware of any emergency vehicles, approaching from in front or behind, drivers must pull over well in advance to provide impeded movement. In the event of a breakdown, accident or road failure, the transporter crew will contact emergency services (including police) as appropriate and will follow all instructions from police and the road controlling authority.

5.2.3 BIODIVERSITY

5.2.3.1 BIRDS AND BATS

Submitter ID	Example Text from Submission
SE-53811959	"(the wind farm) will destroy the local Wedge tailed Eagle population which soar over the proposed turbine site nearly daily"
SE-51696970	"We are worried about the danger to birds and in particular to eagles, who are regularly sliced up by the turbines in other areas"

Submitter ID	Example Text from Submission
SE-53192243	"I am worried about the impact it will have on animals such as the wedge-tail eagles that fly in high concentrations in this area. Turbines are a known killer of eagles, raptors, and other birds and we have a very special area in Walcha that we want to protect."
SE-53821972	"The wedge-tailed eagle, the glossy black cockatoo (EPBC Act listed endangered) and the white-throated needletail (EPBC Act listed vulnerable) have been identified as birds that will be knocked out of the sky, especially because they use the updraft from gullies into ridgelines where will be built. This makes a mockery of the rhetoric surrounding the Gondwana World Heritage Area which will be ringroaded by the greatest avian threat that exists in the district."

Since exhibition of the EIS the Project design has been optimised for constructability, in response to agency advice and public submissions received, and to further avoid and reduce impacts, particularly to biodiversity values. The Project re-design has been informed by additional (since exhibition of the EIS) bird and bat utilisation surveys (BBUS), as requested by BCS. These surveys were designed in consultation with BCS and align with recently released (June 2023; introduced following exhibition of the Project EIS) guidance on BBUS received from BCS. A framework Bird and Bat Adaptive Management Plan has also been included (Section 7.3 of the BDAR).

The surveys have been used to better inform the collision risk modelling presented in the updated BDAR. Assessment of BBUS data collected from the site informed the relative strike risk of individual turbines for bird and bat species. The following species were observed within the rotor swept area (RSA):

- Wedge-tailed Eagle (*Aquila audax*);
- Australian Raven (*Corvus coronoides*);
- Nankeen Kestrel (*Falco cenchroides*);
- Brown Falcon (*Falco berigora*); and
- Whistling Kite (*Haliastur sphenurus*).

Modelled collision risk for these species combined estimated 0.63 collisions per annum based on 99% avoidance scenario, 1.27 collisions per annum based on 98% avoidance scenario, and 3.17 collisions per annum based on 95% avoidance scenario.

Adaptive management is proposed through the preparation and implementation of an operational BBAMP, and framework for which has been provided in Section 7.3 of the BDAR. This will be finalised, including consideration of additional bird and bat survey data, prior to construction of the Project, and provided to the DPHI and BCS for their approval.

The BBAMP will contain relevant mitigation, as well as ongoing monitoring of impacts to birds or bats during operation of the Project. The BBAMP will be designed to continually test the underlying assumptions about bird and bat activity to enable adaptive management measures to be implemented, if required, to reduce measured impacts.

The Project design has also been optimized to further avoid potential habitat for birds and bats, including relocating turbines, where necessary:

- To provide a buffer of at least 120 m from blade tip and treed areas that were assessed as potential habitat for birds and bats;
- To be at least 600 m from the boundary of the Oxley Wild Rivers National Park; and
- Practicable to avoid wooded vegetation and PCTs associated with threatened species.

5.2.3.2 THREATENED SPECIES AND COMMUNITIES

Submitter ID	Example Text from Submission
SE-51017209	"have also negotiated some special conditions regarding compensation for trees to be removed and also the EXACT GPS positions for the line to be routed. The reason for this is we have undertaken extensive revegetation works over the last 40 years, and the agreed path limits the unnecessary destruction of both planted and naturally occurring vegetation."
SE-53737320	"Adjacent to a Very Rare Rainforest. The Rarest in the World. Needing Protection from our government."
SE-53451022	"Threatened flora, including the Narrow-leaved Black Peppermint, a type of Eucalypt unique to the New England and specifically the Oxley Wild Rivers National Park. The Gondwana Rainforests are unique to this area and small in mass. This is something we should be protecting. Vestas solution of carbon credits to offset this destruction should not even be considered. There is no price to initiate extinction to a whole ecosystem."
SE-53542707	"The project will cause enormous disruption and damage to the Oxley Wild Rivers National Park, which includes the World Heritage listed Gondwana Rainforest."
SE-53615211	"endangered species are found in these forests and their habitats are of value and importance for future generations"
SE-53471707	"The Biodiversity report is inadequate, when the surveys where done during the drought"
SE-53385460	"The location of the turbines are too close to the national park and the gorge - they will be seen from the viewing platform at Apsley Gorge. It is going to destroy/ critically endanger our flora and fauna"
SE-53383958	"Koala habitat has returned and been sited on our property after many years following fires and storm damage and we believe the Koala population will be affected detrimentally by the wind farm developments proposed"
SE-53808217	"There will also be a huge loss of habitat for Koalas, Quolls, Gliders, 207Ha in fact. Where will these animals move to, will they have a chance to relocate, or will they be killed in the process of construction?"

Additional threatened communities and species surveys have been undertaken in response to public submissions and advice provided by the BCS, and in accordance with the requirements of the BAM (2020). This information has been used to further refine the Project design to avoid and minimise impacts to biodiversity values. The additional survey effort has also been used to better inform assessment of direct, indirect and prescribed impacts, and reduced the needs to assume presence for several species. One expert report, for *Litoria castanea*, has been obtained as survey effort for that species was not met. This report concluded that there is unlikely to be suitable habitat for this species within the Project Disturbance Footprint and that impacts to this species are unlikely to result from the Project.

The Amended Project has resulted in a significant reduction in impacts to threatened communities and species. This includes reduced impacts to the following TECs and SAI entities:

- New England Peppermint Grassy Woodlands; and
- White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

The Amended Project has also significantly reduced potential impact to potential habitat for threatened species including Glossy Black-cockatoo, Barking Owl, Greater Glider, Squirrel Glider, Spotted-tail Quoll and Koala.

The amended BDAR quantifies the magnitude of this reduction in impacts.

5.2.3.3 BIODIVERSITY OFFSET

Submitter ID	Example Text from Submission
SE-53316709	"Whilst there are identified economic benefits to the small community, there appears to be a lack of consideration to the environmental impact to the areas with a staggering 64 million put aside by offshore investor Vestas to pay for environmental credits for the environmental cost to the area. It is recognised that habitats of Koalas Spotted Quoll Greater Glider and Wedge tail eagle to name a few will be severely by this project. It makes a mockery of renewal energy to save the climate when this ability to offset impact [c]an be garnered"
SE-53318468	"This Dutch company, Vestas, does not care for our Australian ecosystem, but simply proposes to pay for the assessed destruction of our native habitats and fauna through a penalty system totaling over \$64 million. Our Governments should be disgusted to think of contemplating any support of this buy off."

Since exhibition of the EIS, the Applicant has further refined the Project design to avoid and/or minimise biodiversity values. This has led to a total reduction in offset credit liability of 7,816 species credits and 3,131 ecosystem credits, which will equate to a reduced offset cost liability of approximately \$27M. The Applicant has also commenced detailed assessments of several properties to determine their suitability as biodiversity stewardship sites.

The Applicant does not propose to offset impacts by paying the associated offset liability, for most plant community types and species. Rather the Applicant intends to pursue an offset strategy that will include securing in perpetuity biodiversity stewardship sites with like-for-like biodiversity values to those impacted by the Project.

The stewardship sites will be secured under agreement between the relevant landowner and the BCS Credit Supply Taskforce and will be managed to maintain or enhance their biodiversity in perpetuity.

The Applicant is also proposing additional measures to address the localised loss of SAI entities including revegetating up to 15 ha of non-woody/cleared lands within 25 km of the Project Area to re-establish up to 7.5 ha of each SAI entity.

5.2.3.4 HABITAT LOSS

Submitter ID	Example Text from Submission
SE-53563211	"Loss of connectivity habitat – project will impact wildlife corridors to the National Park"

Significant areas of intact remnant vegetation remain throughout the amended Project Area, including a significant tract of wooded vegetation through the centre of the site. At a regional scale there is connected habitat through the centre of the Project Area from north to south. At a local scale, there are smaller patches of remnant vegetation that connect areas of habitat adjacent to the Project Area to the connected habitat that runs through the Project Area. The amended BDAR has concluded that turbines do not substantially affect the functionality of either the regional or local habitat pathways. The Amended Project has also, where necessary, relocated WTGs to at least 500 m from the Oxley Wild Rivers National Park boundary, as requested by BCS.

As discussed previously the refinements to the EIS Project layout were driven by the need to further demonstrate avoidance and minimisation of impacts. The Amended Project has reduced impacts to native vegetation by 28%, and reduced impacts to *White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland* by 81%. Potential impacts to potential habitat for threatened species including Glossy Black-cockatoo, Barking Owl, Greater Glider, Squirrel Glider, Spotted-tail Quoll and Koala have also been significantly reduced.

5.2.4 VISUAL

5.2.4.1 PRIVATE VIEWPOINTS

Submitter ID	Example Text from Submission
SE-52964961	"Aesthetically they (wind farms) are pleasing to me"
SE-51225739	"Personally I think they (wind farms) look quite majestic spinning in the wind"
SE-53808219	"the wind farm will also be a great addition to the Walcha region, it will be a beautiful and iconic structure that will attract visitors and showcase the region's commitment to sustainability and renewable energy"
SE-53499965	"We do not want our beautiful views to be spoilt by towering wind turbines and gravel roads meandering over and through our undulating hills"
SE-53379986	"Our local beautiful, clear night skyline will be decimated by the lights on top of these things, resulting in the skyline looking like a Christmas tree."

Submitter ID	Example Text from Submission
SE-53659207	"We moved from the city of Sydney to live in a rural community, looking out on uninterrupted skylines with minimal noise pollution other than the occasional ag bike, bellowing cows, tractors and screaming kids on ponies and push bikes. We did not move to live in an industrial landscape looking onto hundreds of turbines"

The LVIA prepared to inform the EIS was undertaken in accordance with the Visual Bulletin. The assessment identified 43 non-associated dwellings within the 'blue' and 'black' lines requiring detailed assessment. Of these, 12 non-associated dwellings were determined to have potential for moderate visual impacts, while five (5) non-associated dwellings were determined to have potential for high visual impacts.

In assessing all non-associated dwellings within 8 km of a turbine, only 11 were deemed to have potential views of turbines in up to three 60-degree sectors. Only one (1) property was deemed to have potential views of wind turbines in more than three 60-degree sectors.

As discussed, the Project design has been revised to that shown in the EIS, in response to submissions received, to further reduce potential environmental and social impacts, and in consideration of constructability requirements. This revised design necessitated an update to the LVIA, which is presented with the Amendment Report. The updated LVIA (Appendix F, Amendment Report) shows that visual impact has been reduced as follows:

- The number of non-associated dwellings within 4,550m of the nearest turbine has reduced from 43 to 39 dwellings. There are now 17 non-associated dwellings (previously 20) within the black line of visual magnitude (3,100m). There are now 21 non-associated dwellings (previously 23) located within the blue line of visual magnitude (3,100m - 4,500m);
- Two (2) non-associated dwellings previously within the blue line of visual magnitude are now outside of the blue line of visual magnitude (SR050 and SR093) due to the amendments to the turbine layout;
- The number of non-associated dwellings with potential high visual impact has decreased from five to zero;
- The revised layout of wind turbines associated with the Project results in the reduction of the number of non-associated dwellings with turbines located within multiple 60-degree sectors; and
- The revised zone of visual influence indicates a slight reduction to the number of visible turbines from land to the west of the Project.

Mitigation measures are proposed to minimise these impacts as discussed in **Appendix B** of the Amendment Report.

5.2.4.2 LANDSCAPE CHARACTER

Submitter ID	Example Text from Submission
SE-54201220	"The ill effect of wind farms is very minor"
SE-53808219	"the wind farm will also be a great addition to the Walcha region, it will be a beautiful and iconic structure that will attract visitors and showcase the region's commitment to sustainability and renewable energy"
SE-53246960	"I think wind turbines are engineering marvels and I cannot wait to see them erected amongst our landscape"
SE-53816226	"Wind turbines look amazing and... I would even go as far to say that such beauty will even further help the tourism industry of Walcha"
SE-53811959	"The visual impact of the entire project is completely detrimental to the lifestyle and environmentally rich surrounds"
SE-54210471	"With the visual change to our landscape of the 119 turbines, added to this a cumulative proposal of 660 turbines our scenery will be changed immeasurably. Towers visible from town and Apsley falls are crazy"
SE-51696970	"Visitors currently come to Walcha for the pristine landscape, not to see massive wind towers, and I am concerned about the effect that these estates will have on our tourism industry"
SE-53385460	"The location of the turbines are too close to the national park and the gorge - they will be seen from the viewing platform at Apsley Gorge. It is going to industrialize our landscape"
SE-53724471	"Walcha has one of the most significant outdoor sculpture galleries in Australia. The natural beauty of the Walcha district in any season is stunning - the open spaces and the night skies are unsurpassable. I am certain that visitors will not flock to Walcha to see the ugliness of the wind turbines inflicted upon the skyline of Walcha."

The visual impacts on the landscape character were assessed as part of the LVIA (refer Section 15 of Appendix I of the EIS). The LVIA assessed nine landscape character units (LCUs), and determined that for eight of the LCUs, the Project would not disrupt the key landscape features or disrupt the identified key landscape features of the LCU. The remaining LCU, (LCU06, Rowleys Creek Road) identified that the turbines have the potential to be a major feature from some nearby locations. However, the LVIA also noted that the views towards the ridgeline and undulating landform would remain a dominant visual element.

Overall, the LVIA has assessed that it is likely the character of areas which are valued for their high landscape quality and utilised for recreation and tourism will remain intact. Regionally, significant landscape features identified would remain dominant features of the landscape and it is unlikely the proposal would degrade the scenic value of these landscape features. The Amended Project layout changes are not significant enough to warrant a reassessment of the LCUs.

5.2.4.3 ASSESSMENT METHODOLOGY

Submitter ID	Example Text from Submission
SE-51206225	"The developer produced Photomontages to show the visual impact of the towers from two of the residences on our farm on two occasions. The developer failed to show the majority of the photo's they took. The only photo they showed us was from behind a tree, where the towers were obscured."
SE-53795733	"The Scottish Visual Guideline requires that the selection of viewpoints be done with the involvement of the planning authority which has not been done in the EIS."
SE-53385460	"An appendices shows "views of the turbines" from behind a tree?"
SE-53714227	"Photomontages, when supplied, are grossly inadequate and dishonest. Height of turbines are inaccurate and suggestions for blocking them out are ludicrous."

The Project SEARs specified that the landscape and visual assessment be undertaken in accordance with the Visual Bulletin. The LVIA was prepared in accordance with the Visual Bulletin and by suitably qualified landscape and visual impact specialists.

Page 13 of the Visual Bulletin requires use of the Scottish guidelines when preparing photomontages but does not specify that this guideline must be used when determining zone of visual influence. The zone of visual influence is a preliminary assessment tool that represents a bare ground scenario - i.e., a landscape without screening, structures or vegetation. As accurate information on the height and coverage of vegetation and buildings is unavailable, it is important to note the zone of visual influence is based solely on topographic information. Unlike photomontages, the zone of visual influence does not consider the potential screening effect of structures or vegetation which may screen views to the Project. Therefore, this form of mapping should be acknowledged as representing the worst-case scenario.

A total of 56 viewpoints from varying distances were carefully selected to represent a range of views within the Study Area. The selection of viewpoints was generally informed by the topographical maps, field work observations and other relevant influences such as access, residences, landscape character and the popularity of vantage points. Viewpoints are selected to illustrate a combination of the following:

- Viewpoints identified by the community in community consultation phase of scoping report;
- Present landscape character types;
- Areas of potentially high landscape or scenic value;
- Range of distances;
- Varying aspects and elevations;
- Varying extent of wind farm visibility (full and partial visibility); and
- Sequential views along specific routes.

Once the viewpoints had been selected, panoramic photographs are taken in accordance with the standards outlined in the Scottish guideline.

Photomontages and wireframes were prepared for 11 public and nine private viewpoints to best illustrate the potential appearance of the wind farm from varying distances and locations with differing views. This included four (4) photomontages/wireframes relevant to Oxley Wild Rivers National Park and the Gondwana Rainforests of Australia World Heritage Area. These locations were selected based on feedback received from the community. Exact photomontage locations were selected on site to represent a worst-case scenario for the viewpoint location. Localised screening factors such as vegetation were avoided (where possible) to ensure maximum exposure to the Project. Photographs used for viewpoints are taken on a level tripod at a height of 150 cm to represent eye level.

5.2.4.4 OBSTACLE LIGHTING

Submitter ID	Example Text from Submission
SE-53818479	"Add the flashing white or red lighting and our night skyline is dramatically altered".
SE-53681494	"...interruption to peoples lives with the visible aspect of towers and lighting..."
SE-53774210	[Paraphrased] Cumulative effect of nighttime lighting

Engagement undertaken during preparation of the EIS identified that the community is generally opposed to obstacle lights being installed on high structures due to concerns relating to visual amenity. This is reflected by comments such as those received above. The Aviation Impact Assessment prepared to inform the EIS concluded that obstacle lighting on the WTGs was not required (see Section 12 of the LVIA in Appendix I of the EIS). The updated Aviation Impact Assessment (Appendix L of the Amendment Report) concluded the same.

The Applicant understands that the default position of CASA is to recommend aviation lighting for most windfarms, regardless of whether the aviation impact assessment concludes they are not required. The Applicant maintains that, based on the conclusions of the aviation assessment, aviation lighting is not required.

Should the consent authority determine that obstacle lighting is required, regardless of potential visual impact on the landscape, the Applicant would recommend installation of a lower intensity 200 cd obstacle light, as opposed to the standard 2,000 cd light. Nightlight shielding could also be provided to reduce the downward spill of light to the ground plane.

5.2.5 NOISE

5.2.5.1 OPERATIONAL NOISE

Submitter ID	Example Text from Submission
SE-52964961	"We were taken to one of the turbines and stood beneath it while it turned. Yes, there was a noise, but quite tolerable and we were standing directly beneath the blades. I believe that some people imagine the noise to be intolerable but that is untrue and a false argument"
SE-53246960	"I haven't found wind turbines visually distracting or noisy when visiting other locations with them"

Submitter ID	Example Text from Submission
SE-53518484	"We do not want our lives changed by the noise of rotors"
SE-53385460	"We know the turbines will be heard in town, particularly on cold days... The EIS indicates noise will only be heard from 1.5km away, I have however been told by people who produce this information (noise studies) that the study can be completed, and results can be made to favour the developers' desires."
SE-53609462	"Noise levels have not been adequately monitored as the gorges land is the habitat of many ENDANGERED species including koala, gliders, quolls and their hearing cannot be determined and the effect on their well being cannot be forecasted."
SE-52993967	"Noise. I know from having been to wind farms overseas that the noise they make is terrible. I don't want that sort of noise in my backyard"
SE-53524957	"There are no facts available about how far the noise will travel from the developers, this needs to be addressed."

Operational noise impacts to non-associated dwellings as well as the Oxley Wild Rivers National Park were assessed during the development of the EIS (refer to Appendix H of the EIS). The assessment determined that based on the predictions, the relevant noise and vibration criteria will be achieved under conditions most conducive to noise propagation at all dwellings. The assessment has been updated to consider the Amended Project design and concluded that without any noise mitigation measures, the noise from the 118 WTGs will achieve the operational noise criteria at all dwellings in the vicinity of the wind farm. The conclusions of the EIS therefore remain valid.

Mitigation measures to manage impacts from construction and traffic noise are outlined in Section 6.2.4 of the EIS. These include:

- Pre-construction noise assessment;
- Monitoring of operational noise to verify compliance with the noise criteria;
- Scheduling of construction works to generally between standard hours;
- Implementation of "feasible and reasonable" noise control strategies, such as acoustic noise barriers (or other applicable measures);
- Locating fixed noise sources such as crushing and screening plant, concrete batching etc. at maximum practicable distance to reduce potential impacts, and implementing acoustic screens at fixed noise sources that are located within 2.4 km of a non-associated dwelling;
- Provide proprietary acoustic enclosures for site generators and compressors located within 2.4 km of a non-involved dwelling;
- Investigation and implementation of alternative processes (where feasible and reasonable) such as hydraulic or chemical splitters as an alternative to impact rock crushing, or the use of broadband reversing alarms;
- Site and activity management to minimise noise propagation; and
- Equipment and vehicle management and maintenance to minimise noise propagation.

A detailed response to matters raised in submissions by Voice for Walcha including a third-party review of the NIA by L Huson & Associates is provided as Appendix D. Comments addressed in the response relate to:

- Infrasound (also summarised below as this matter was raised by the community generally);
- The selection of WTG model;
- The relevant version of the South Australian Wind Farm Environmental Noise Guidelines;
- Evidence of any negotiated agreement for landholders;
- The Uren v Bald Hills Wind Farm Pty Ltd court case;
- Reliability of modelling input parameters, methodology, and background noise measurements; and
- Tonality assessment.

5.2.5.2 IMPACTS FROM INFRASOUND

Submitter ID	Example Text from Submission
SE-51405459	"The massive 6.2mw turbines to be built will far exceed the critical health amplitude threshold of 80db chronic exposure of infrasound across a distance of 20kms or more. Such a level of infrasound could be deleterious to the mental and physical health of vulnerable to infrasound residents living in the town of Walcha and surrounding districts."
SE-53787207	"We have been told the infrasound from the transmission towers and the turbines create health issues for livestock."

Infrasound is sound at frequencies less than 20 hertz and is often described as being inaudible. However, sound below 20 hertz can be audible provided that the sound level is sufficiently high. In the NIA that supported the EIS (Sonus, 2022), the G-weighting scale was standardised to determine potential human perception and annoyance due to noise that lies within the infrasound frequency range. A common audibility threshold determined from several studies is an infrasound level of 85 dB(G) or greater. Early wind turbines were constructed with blades located downwind of the tower. These turbines produced significant levels of infrasound because of the wake caused by the tower. Modern wind turbines are constructed with blades upwind of the tower, resulting in infrasound levels well below the level of perception at residential dwelling setback distances.

Appendix D provides an assessment of studies relating to the level of infrasound produced by wind turbines (refer Appendix D). These studies confirm that the level of infrasound from wind turbines is no greater than the noise encountered from other natural and non-natural noise sources.

A 2013 study by the South Australian EPA into infrasound (EPA South Australia, 2013) provided findings which were consistent with those outlined in Appendix D, including:

- The measured levels of infrasound from wind farms are well below the threshold of perception;
- The measured infrasound levels around wind farms are no higher than levels measured at other locations where people live, work and sleep; and
- The characteristics of noise produced by wind farms are not unique and are common in everyday life.

5.2.6 ABORIGINAL CULTURAL HERITAGE

Submitter ID	Example Text from Submission
SE-51970755	"Wind farms are essential for Australia and their development must be encouraged; especially if they are designed in a way that respects the local environment, protects local heritage values (Aboriginal and historic), and are undertaken with robust community consultation that is conducted transparently. The EIS demonstrates that the Winterbourne wind farm project has achieved all of these aspects"
SE-53618535	"There is no aboriginal heritage management plan which will impact the beautiful community of our First Nations people in Walcha"
SE-53821972	"About 576 ha of grounds with "high cultural values" is expected to be disturbed during the wind farm construction. Its heritage assessment only identifies 16 sites, a fraction of what the Dunghutti believe is there"

An Amended Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared on behalf of the Applicant to address the issues raised in submissions and potential impacts relating to the revised Project layout. The assessment has followed the *Code of Practice for the Investigation of Aboriginal Objects in New South Wales* (DECCW 2010). Field assessment and reporting followed the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011). Aboriginal community consultation will follow the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010b).

As a result of the survey associated with the Project, 23 Aboriginal sites were recorded and the one (1) previously recorded site in the Project Area was revisited. The newly recorded sites include artefact scatters, isolated finds, scarred trees, a quarry site, and an engraving site. Additional fieldwork was undertaken in July 2023 and January 2024 including test excavations at Green Range OS-3 with PAD. The test excavation demonstrated that intact subsurface archaeological deposits are not present at Green Range OS-3 with PAD, however, it is recommended that a prudent measure would be to record, collect, and relocate Aboriginal objects from the surface at Green Range OS-3 with PAD.

An Aboriginal Cultural Heritage Management Plan (ACHMP) will be developed in consultation with the RAPs, Heritage NSW and approved by the Secretary prior to the commencement of works. The updated mitigation measures are included in Appendix B of the Amendment Report.

5.2.7 AVIATION SERVICES

Submitter ID	Example Text from Submission
SE-53451052	"In the EIS there were very few agricultural airstrips noted as being affected by turbines. A member of my family who has worked in aerial services in the area for many years identified many more airstrips that are used in the area, and not noted in the EIS. Agricultural airstrips are used for essential servicing of the area by air. Not only this, but and the area where turbines are proposed would become a no-fly zone. Services by air include (but are not limited to): - Aerial firefighting (including national parks) - Aerial search and rescue - Aerial fertiliser spreading - Aerial weed and pest control These services would become dangerous, if not almost impossible, around the proposed turbines. The area serviced by air is not easily accessible by ground, so this puts the national parks, wildlife and habitat in danger, as well as the community."
SE-53210713	"Due to the elevation of the country and the size of the wind farm it could be a fatal trap to an aviator trying to get over the Great Dividing Range due to the extreme height and the number of turbines that will blanket the ridge lines...This dangerous situation would apply to General Aviation, Agricultural aviation for the application of fertilizer or chemicals, Emergency services, e.g. patient retrieval and aerial firefighting. Aerial firefighting downwind of a fire I would consider to be unviable. Will whoever owns the Winterbourne Wind Farm at the time, accept liability if the turbines impede firefighting or a medical retrieval? The whole wind farm project, in relation to aviation should be looked at as a whole, the more turbines built the more detrimental it will be for the safe operation of low level flight."
SE-53356476	"The project no-fly zones will affect crucial rural airstrips, affecting crucial tasks such as firefighting, fertilizing and seeding."
SE-53795733	"Consequences may result in very long-term operational issues, impact NPWS ability to control wildfire on NPWS estate and/or defend NPWS estate from fire encroaching, result in long-term financial impacts due to aircraft inefficiencies (long ferries and the use of alternate water points) and significantly compromise fire crew safety. Similarly, Westpac Rescue Helicopter made the following comments regarding Obstacle lighting risk assessment.... these actions are yet to be completed and were not incorporated into Aviation Projects recommendations."
SE-52192461	"Helicopter medical retrievals, around Walcha would be impacted adversely, putting people's lives in danger. These are a regular occurrence and would be even more hazardous, and particularly dangerous at night." "cause considerable safety concerns when weather become a factor with low cloud on the escarpment where the turbines will be. The EIS states that the turbines will have muted colours"

A comprehensive Aviation Impact Assessment (AIA) was undertaken to inform the EIS and has been updated in response to submissions and to assess the amended design. The AIA included an assessment of potential impacts on aerial application operators, aerial firefighting and aerial emergency services.

Aircraft landing areas (ALAs) were identified through OzRunways, which sources its data from Airservices Australia (AIP) and Aircraft Owners and Pilots Association (AOPA) Australia Airfield Directory. Additional ALAs were identified through engagement with local aerial operators such as Superair and other official sources.

In completing the AIA, WinterbourneWind, through its specialist aviation consultant, engaged with local aerial operators including Superair, Corporate Air/Air Link, Fleet Helicopters, as well as NPWS (Oxley Wild Rivers National Park), NSW RFS, and Royal Flying Doctor Service (RFDS). Although concerns were raised, ultimately these operators advised that as standard practice they would assess wind turbines as potential hazard to aircraft operations and alter their operations as necessary. As such the AIA concluded that safe aerial application operations would be possible on properties within the Project Area and neighbouring the Proposal Area through implementation of the recommendations provided in the AIA (Appendix K of the EIS).

More broadly, evidence suggests that aerial agricultural operations and wind farms can safely coexist with engagement and coordination between the respective parties. Typically, aerial agricultural applications are applied in slight wind conditions when turbines are either stationary or rotating slowly. The Applicant is willing to work with aerial agricultural operators to manage impacts accordingly.

To facilitate the flight planning of aerial application operators, details of the Project including location and height information of wind turbines, wind monitoring towers and overhead powerlines will be provided to landowners so that, when asked for hazard information on their property, the landowner may provide the aerial application pilot with all relevant information.

As stated in **Section 5.2.4.4**, the Applicant understands that the default position of CASA is to recommend aviation lighting for most windfarms, regardless of whether the aviation impact assessment concludes they are not required. The Applicant maintains that, based on the conclusions of the aviation assessment, aviation lighting is not required.

5.2.8 BUSHFIRE MANAGEMENT

5.2.8.1 FIREFIGHTING (AERIAL AND LAND)

Submitter ID	Example Text from Submission
SE-51451713	"The new road network that will be built will enhance access to many private properties on the eastern side of Walcha and the Oxley Wild Rivers National Park for bushfire fighting. As a member of the Winterbourne-Moona bushfire brigade for over 50 years and the farmer representative on the New England RFS Advisory Committee, the Winterbourne Wind Farm project will be an advantage for fire fighters"
SE-53471487	"With drought and bushfires still fresh in our minds I am deeply concerned about the restrictions of water aircraft not being able to provide assistance in the event of a bushfire to protect our land, livestock, flora and fauna, native animals in our community, potentially causing devastating impacts for all."
SE-53724471	"Water bombing is a widely used and efficient method of bushfire control in our district and in most rural areas of Australia. It is a method of bushfire control that is used worldwide. In some instances, it is the ONLY method of bushfire control, particularly in steep, inaccessible areas such as the Oxley Wild Rivers National Park which is the immediate proximity of the proposed Winterbourne Wind project. If aerial water bombing is stopped due to the wind turbines surrounding our home, it is creating a high risk of loss of lives..."

Potential impacts to aerial operators are discussed in **Section 5.2.7**. In summary, aerial operators were engaged with during preparation of the EIS and, while general concerns were raised, all operators accepted that as standard practice they would assess wind turbines as potential hazard to aircraft operations and alter their operations as necessary. Similarly, NSW NPWS and the NSW RFS were both consulted during preparation of the EIS regarding the Project in general, and potential impacts relating to communication links and firefighting. No issues were raised regarding potential impacts to NPWS communications links. Regarding firefighting, NPWS advised that the Applicant should work with NPWS to develop a management plan that includes measures to minimize impacts to aerial firefighting.

In the letter dated 24 January 2023 by NSW RFS, it was noted that the bushfire mitigation measures, as outlined in Section 6.5.2.4 of the EIS were acceptable and will be included in any approval granted. This includes the preparation of a Bushfire Emergency Management and Operational Plan (BFEMOP) which will consider aerial firefighting capabilities. The NSW RFS will be provided with coordinates of the final WTG layout and identification information for individual WTG sites, to facilitate internal fire response planning. The Applicant will also engage with FRNSW and NSW RFS to develop operational procedures for remote shutdown to allow for aerial firefighting in the vicinity of the Project.

Aerial firefighting operations would treat turbine towers like other tall obstacles such as high voltage transmission lines or telecommunication towers which are commonly found throughout the landscape. Pilots and Air Operations Managers will assess these risks as part of routine procedures. As recommended by the AIA, the Applicant will engage with local aerial firefighting operators to develop procedures for aircraft operations in the vicinity of the Project.

The proposed Project access roads will not only provide greater access to the Project Area, but also the boundary of the adjacent Oxley Wild Rivers National Park. New roads will be all-weather access and of adequate width to enable firefighting vehicles to access and manoeuvre. The Project will also require upgrades to existing public roads, which will also facilitate better access to the western perimeter of Oxley Wild Rivers National Park for emergency services personnel.

As reported in Section 6.5.2 of the EIS, in accordance with Table 5.3d of PBP 2019, a water supply no less than 20,000 L will be provided to improve property protection measures and/or to act as a static water supply for emergency services in consultation with NSW RFS. In the letter dated 24 January 2023 by NSW RFS, the bushfire mitigation measures as outlined in Section 6.5.2.4 of the EIS are accepted and will be included in any approval granted.

5.2.8.2 WIND TURBINE FIRES

Submitter ID	Example Text from Submission
SE-53471485	"...wind turbines are fire hazards and pose real threats to the environment. Not only do they attract lightning, they can also initiate upward lightning flashes."
SE-53474708	"Wind tower malfunctions are notorious and they often create fires. This additional risk plus the fact the aerial firefighting capability will be negated are good reasons not to approve the project."

Submitter ID	Example Text from Submission
SE-53524957	"This project will be a fire hazard if a turbines catches a light (as recently seen in Australia) being in close proximity to our local National parks, which then threatens the endangered species of wildlife..."

Vestas wind turbines are equipped with a fire detection system within the nacelle and fire suppression agent. Each wind turbine is connected to a control centre which constantly monitors the wind turbine and shuts down the turbines if there is a risk of overheating. Turbines also automatically shut down if they are getting close to functioning outside their design conditions such as wind speeds greater than 25 m/s. WTG towers are also made from non-combustible material and do not present a significant fire risk. The risk that a wind farm itself will cause a fire is considered low given appropriate protection measures (AFAC, 2018).

All infrastructure will have an APZ, which is a buffer zone between a bushfire hazard and buildings or infrastructure. The APZ is managed to minimise fuel loads and reduce potential radiant heat levels, flame, localised smoke, and ember attack. The Project would not require APZs that extend beyond the Project Area or rely on ongoing maintenance activities by adjacent landowners, including NPWS. Similarly, the Project would not encroach on, or impact the use of, the mapped Strategic Fire Advantage Zone.

An APZ will be established at the respective location of work, at the appropriate time, prior to commencement of activities, and maintained for the life of that component. An APZ no less than 10 m in width will be provided, thus providing a defensible space around key infrastructure and temporary construction facilities (as described in Table 5.1 of Appendix L of the EIS). Where forest / wooded vegetation is present adjacent to the infrastructure, an increased 20 m wide APZ is recommended.

5.2.9 BESS HAZARDS

Submitter ID	Example Text from Submission
SE-53814530	"The Battery Energy Storage Systems (BESS) adds significantly to the fire risks and environmental cost of the project. There are currently no regulations or safety protocols for dealing with thermal runaway. Yet BESS are proposed for bush fire prone areas. This project provides no details on the fire suppressant systems that could prevent an environmental disaster from fire and the subsequent thermal runaway. Are we waiting for a disaster before implementing any regulations? What about the environmental cost of the additional land clearing around BESS? And the water supply required to put out a fire in BESS?"
SE-53795733	"...the EIS is vague on detail as to location and configuration. Until details on its location are available it impossible for the community to assess the hazards and risks."
SE-53782456	"...the fire and toxicity of BESS have adequate safeguards...."

The final model and design specifications of the BESS will remain within the specifications assessed in the PHA. Section 3.3.6 of the EIS describes safety features of BESS which makes a fire event originating from the BESS extremely unlikely. To create a significant fire in the BESS, the enclosure of the battery unit needs to be subject to an extreme external event, such as direct exposure to a large, prolonged fire or severe physical impact. A battery Heating, Ventilation, and Air Conditioning (HVAC) system will actively cool the BESS. The BESS will be temperature monitored, and the automated control system will stop its operation if the temperature exceeds pre-set levels to prevent overheating (e.g., if all air conditioning units fail). The BESS will include a gravel surface and a 20 m APZ to minimise the risk of fire escaping from the facility and the risk of external fire affecting the facility.

5.2.10 WATER AND SOIL RESOURCES

5.2.10.1 RESOURCE SUPPLY

Submitter ID	Example Text from Submission
SE-53645760	"The scale of water needed for this project is huge, and we do not have these types of supplies in our area. Ensuring that our water supply both above and below ground is not effected by this project is paramount, but can not be guaranteed and therefore is of huge concern to us. In agriculture water is everything, if our water supplies are effected our production can not continue."
SE-53795736	"Water is precious and particularly valuable to our livestock and agricultural industries. EIS suggests the requirement for 150 Megalitres. EIS also states 6ML for concrete foundations, but simple arithmetic of 20% of 750cu.m per foundation x 119 turbines gives 17.8ML. Similarly, dust suppression has been understated using industry estimates."
SE-53439457	"Where are water and gravel coming from? Walcha water supply is for the use of the town, not for the use of industry such as this development. There is no source of gravel within the region large enough to cater for this development. So where is it all coming from? The EIS statement does not address these concerns properly."
SE-51179966	"I have concerns about where the developer wishes to obtain large quantities of water. The EIS indicates that they will be pumping water from the Apsley River, which I object to. The residents of Walcha are not able to pump water for household use from the Apsley River, it seems unbelievable that water can be pumped for industrial use. Water is a very valuable resource that is very restricted in times of dry, and this is an enormous quantity of water (116ML required)"
SE-53473505	"The concrete required and the materials required to create the concrete. The EIS suggests that Walcha will supply the water required. Walcha already has a massive water shortage. With a project of the scale that is being proposed, it is unrealistic for the water to be harvested in Walcha for the quantity that is required. The gravel required for the Winterbourne Wind Project is estimated to be 850,000 tonnes, if the estimations in the EIS are correct. This is an unrealistic volume of gravel to be relocated to Walcha."

Since exhibition of the EIS, the Applicant has undertaken additional assessment of options to source raw materials. The assessment has concluded that it will be possible to source most, or all the gravel and water required for the Project on-site. As such, the Project will now include a quarry within the Project Area where capping material required for construction of access tracks and hardstands will be sourced. The quarry may also be able to supply aggregates for concrete batching and crusher dust for use as trench bedding material, subject to material testing. The quarry has been included in the Amendment Report, including assessment of potential impacts associated with its construction and use.

The Applicant has also installed onsite groundwater bores in the Project Area and has determined that onsite groundwater sources will be adequate to meet the construction needs of the Project (subject to licensing and acquisition of water allocations). Groundwater will therefore be the preferred water supply option for the Project. Water quality testing conducted to date suggests that the groundwater will be suitable for use in concrete batching; however, if the water quality is not suitable then some potable water may need to be imported for this purpose. Potable water will also be imported to the site for personal consumption and cleaning at the construction compounds and maintenance facility.

5.2.10.2 IMPACTS FROM EROSION

Submitter ID	Example Text from Submission
SE-51018476	"the large amount of sand required for the concrete foundations of the towers will provide opportunity to rehabilitate the nearby upper reaches of the nearby Gwydir River from the siltation caused by the extensive gold mining activities at Rocky River during the mid 1800's"
SE-53459768	"The road building and excavation required will lead to erosion and damage to the immediate area, but also downstream all the way to the ocean."
SE-53430481	"The ridge line corridor between Walcha and the Apsley Fall is 17 kilometres long and I called it important because it is a recharge zone for our landscape. A recharge zone is important as it supports our underground water systems and allows the whole of the landscape access to underground water. The hilltops and ridgelines need trees to hold water and slow the runoff of rainfall, preventing erosion and helping infiltration of rainfall to our groundwater systems."
SE-53795736	"Due to construction against the ecosystems within the Oxley Wild Rivers National park, part of the World Heritage Gondwana Rain Forests. Concerns with this proximity relate to construction run-off directly impacting the Park and the Macleay Catchment and River itself"
SE-53800208	"project development including clearing of vegetation, building of roads and construction of the wind towers themselves as well as all the associated traffic will lead to erosion and in turn sedimentation and contamination of waterways that flow directly into the National Park and World Heritage Wilderness area."

The Project has been revised and refined over time in response to constructability requirements and in consideration of environmental constraints. A Soil and Water Management Plan (SWMP) will be prepared prior to construction commencing. This plan will address management requirements at individual work sites. The SWMP will be accompanied by progressive Erosion and Sediment Control Plans to address management requirements at individual work sites. Impacts to soil and water resources will be mitigated through the implementation of specific mitigation and management measures as described in Section 6.8.5 of the EIS.

ERM has prepared a Conceptual SWMP to outline the fundamental principles to be followed in the planning and implementation of erosion and sediment control measures for the Project and this is included in Appendix P of the EIS.

An Environmental Management Strategy (EMS) will be prepared post approval including a detailed SWMP that will include elements of the Conceptual SWMP, and any additional measures required to manage the erosion, sedimentation, and water quality risks of the Project. It is not feasible to prepare a detailed SWMP at this stage that addresses all work sites, as works will be dispersed over large distances, will occur in stages, and in many cases have not yet been subject to detailed design. Progressive Erosion and Sediment Control Plans will be prepared once detailed design plans are available, particularly the detailed road, drainage and creek crossing designs.

A SWMP would also be prepared for the decommissioning phase of the Project.

5.2.10.3 CONTAMINATION OF SOIL AND WATERWAYS

Submitter ID	Example Text from Submission
SE-53808217	"Normal wear and tear of these blades is called Leading Edge erosion, a study has shown that 62kgs of blade material per turbine is shedded each year. To equate this to the Winterbourne Project over a 20 years timeframe, 147 tonnes of toxic resins and microplastics will be washing into our National Parks."
SE-52859212	"...the most disturbing is the toxic BPA resin used to coat the wind blades which will naturally decay over time and seep into our waterways and contaminate our food chain. If levels of BPA are found in our lamb or beef, there goes the most important industry to this area."
SE-53451052	"I have concerns about the materials that are used to produce the blades, and the potential for erosion of particles from the blades into the ecosystem. Nano particles can be transported by wind and water, potentially spreading over a wide area. They can also be taken up by plants and animals and can even enter the food chain."

Turbine blades are made from a mixture of composites, which primarily is a mix of epoxy glue and glass fibres, as well as carbon fibre. Since wind turbines may operate under harsh conditions over their expected lifetime of 30 years, the blades are designed to be resistant to material erosion.

During the lifetime of a turbine blade, very small quantities of blade material will wear away from the leading edge of a blade due to erosion caused by rain droplets and dust particles in the air. Vestas estimates that less than 50 grams of material could be released annually from a large blade. This quantity is extremely low, especially when considered against the total weight of the blade (approximately 23 tonnes). Any material which is eroded would consist of fully cured paint particles which are chemically inactive.

Wind turbine blades are continuously monitored and maintained throughout plant operation to reduce leading edge erosion and reduce impacts to the environment.

5.2.11 AGRICULTURE

Submitter ID	Example Text from Submission
SE-51534710	"Walcha is primarily a grazing district for sheep & cattle, and the beauty of a wind farm is that once the turbines have been built, farmers & the wind farm can run cohesively with stock being able to graze right up to the foot of the turbines"
SE-53624208	"As a host of Winterbourne Wind infrastructure the income from the Wind Farm lease will make a significant contribution to my farm business. This income will enhance the sustainability and resilience of my farm business...[and] ...also increase my ability improve farm productivity (increase pasture production and quality), infrastructure (water and fencing), and to provide an opportunity for succession planning and retirement to continue as a family farm"
SE-53737478	"As a farmer in the Walcha LGA I also oppose the Winterbourne Wind Farm development on the grounds that their mitigation practice for bio-security breach is inadequate. With the transportation of so many resources and so many people into prime agricultural land, the threat to food production and to animal welfare from the introduction of weeds, pests and disease is extensive and should not be overlooked. Industrial wind farms should not be built on agricultural land."
SE-53745735	"...have some concerns about the development and would like greater detail given regarding mitigation of the spread of weeds from increased traffic. I could not identify any wash down areas or procedures mentioned to reduce the risk of spreading weeds. The main weeds of concern are St John's Wart, African Love grass and Nodding Thistle."
SE-52198207	"...is prime agricultural land and there is not anymore of it being made. Our Earth is finite and our Earth population is 8 billion at the last count and increasing. We need to preserve good agricultural land to feed people. Walcha has excellent pastureland."
SE-53212967	"Prime Agricultural Land: Walcha has always been considered, and will continue to be considered as some of the most highly agriculturally productive land in NSW. Temperate conditions, fertile soils and high rainfall support high levels of animal production. The proposed project will induce stress on animals on a number of fronts- but most notably due to the noise, vibration, blade flicker and inhalation of other compounds"

During operation of the wind farm landowners will be able to continue normal grazing or cropping activities as outlined in Section 7 (Justification of the Project) of the EIS.

The EMS for the Project will include protocols for the construction phase around the cleaning and washing of vehicles, plant and equipment (e.g., wash bays, rumble grids etc.) to minimise any potential risk of transporting / spreading weeds to and around the site.

5.2.11.1 IMPACTS ON FARM PRODUCTIVITY

Submitter ID	Example Text from Submission
SE-53731959	"The Walcha district and its businesses are set to financially gain from these developments for decades to come, This steady flow of income over the next decades will ensure sustainable maintenance, development and improvements of family farms, ensuring quality succession planning and future drought proofing of these businesses. This is amplified locally in the town businesses as there is more money flowing through the town."
SE-53513459	"Improved roads and infrastructure in the Winterbourne area. This will benefit efficiency and productivity of our farm operations e.g truck/vehicle access."
SE-53820978	"The Winterbourne wind project is a welcome boost of life the our region. It will provide a diversified income stream to land holders who have recently gone through the worst drought since records began, suffered the impacts of the recent 2019 bushfires, not to mention the unforeseen droughts fires, floods and any other extreme weather events that are becoming more and more frequent. This project will provide direct financial support to these land owners (myself included) to ensure the resilience of these farming family's business..."
SE-53809710	"As host land landowners earn income from this project, they will be able to better maintain their on-farm infrastructure, employ more outside labour and invest in regenerative agricultural techniques to improve the land and production."
SE-53714818	"The loss of land during the construction and completed project phases, may impact on the gross regional income of the agricultural industry in this area. In turn this may impact the profits of the regional businesses eg Elders, Walcha Vet Supplies, Richardsons Hardware, that supply the industry for all of its operational needs, upon which I rely, to run my business. This lack of business viability may reduce competition, or their presence in Walcha and therefore may negatively impact the supply or costs of essential needs to run my business cost effectively."
SE-53659222	"As a Primary Producer the increased traffic on the main single arterial road (Oxley Highway) to Tamworth will negatively impact the movement of our livestock and income. The time taken to Westdale Abattoir (Woolworths) will increase, a direct correlation to increased shrinkage (weight loss) of my animals destined for slaughter, leading to a loss of income (we're paid on weight and quality of meat as our animals are sold as Premium Grass Fed MSA graded animals) The time taken to Bective Feedlot will increase, as noted above, increasing shrinkage, decreasing our income from less kilograms of cattle delivered (we are paid on a \$/kg not \$/hd)"

The agricultural productivity of the Project Area was considered in the EIS (see Sections 6.1, 6.3, 6.8 and 6.12). The NSW Government introduced a range of measures designed to deliver greater protection to agricultural land from the impacts of developments. Biophysical Strategic Agricultural Land (BSAL) is land identified with high quality soil and water resources capable of sustaining high levels of productivity, which is critical to sustaining the State's agricultural industry. Only two locations within the Project Area totalling approximately 347.6 ha are mapped as BSAL. Of this area, the development footprint covers approximately 44 ha.

Similarly, Critical Industry Clusters (CIC) are concentrations of highly productive industries within a region that are related to each other, contribute to the identity of that region, and provide significant employment opportunities. None of the Project Area is mapped as CIC.

Agricultural production and wind farms can coexist, with grazing practices being able to be undertaken unhindered once the Project is in operation. During construction the Applicant will work with landowners to minimise disruption to agricultural operations.

The development of the Project will also improve accessibility (upgraded and new internal access roads) to agricultural lands within the Project Area. Roads that are external to the Project but that are required to be used for access will also be upgraded as necessary, providing benefits for adjacent agricultural land access.

Payments by the Applicant to host landowners will also benefit agricultural activities within the Project Area, providing an alternative source of income (to that of agricultural production) to help 'drought proof' host landowners' businesses and invest in improvements to their land.

5.2.12 WASTE MANAGEMENT

5.2.12.1 GENERAL WASTE MANAGEMENT

Submitter ID	Example Text from Submission
SE-53618541	"There is no waste management plan..."
SE-53745207	"Maintenance issues are unanswered such as: the inability to recycle components, having to be thrown into landfill, who's landfill?"

A Waste Management Plan will be included as a component of the Construction Environmental Management Plan to be prepared prior to the commencement of construction. The Waste Management Plan will describe the measures to manage, reuse, recycle and safely dispose of waste, and at minimum, will include the mitigation measures documented in Section 6.11.4 of the EIS. An objective of the Waste Management Plan is to ensure that any use of local waste management facilities does not exhaust available capacity, nor disadvantage the local community. The Applicant will also adhere to any conditions of the development consent for the Project pertaining to waste management.

5.2.12.2 TURBINE OIL DISPOSAL

Submitter ID	Example Text from Submission
SE-53480958	"The EIS does not account for the 750 litres of turbine oil that is changed every 3 months x 119 turbines = 89250 litres x 4 changes per year = 357,000 litres per year e.g. the oil disposal transport to where? - replacement oil transport from where?"

Turbines contain moving parts which require lubrication to prevent excessive friction from causing parts to wear prematurely. The main use of lubricating oil in a turbine is for the gearbox. Based on Vestas's experience servicing and maintaining over 150 GW of wind turbine capacity, representing over 55,000 turbines across 77 countries, less than 10 L of oil needs to be added each year to top up the gearbox due to minor leaks. Gearbox oil is only changed/replaced if the gear box fails, which is rare. Where required, the disposal of oil and other lubricants as well as soiled rags used for cleaning leaks will be undertaken in accordance with the Waste Management Plan at approved waste disposal facilities.

5.2.12.3 DECOMMISSIONING AND REHABILITATION

Submitter ID	Example Text from Submission
SE-53821972	"Given their short lifespan, where is their disposal and removal plan? Who will be responsible for this, and how will it be funded? It is between \$500,000 and \$700,000 to dismantle one tower alone. You are handing landholders a cost of hundreds of thousands of dollars per tower to remove without being clear about the future imposition on them or the difficulties in offloading their property once a turbine is out of date, broken or faulty. There is no rehabilitation or reclamation of the structure. It's opaque at best as to who is responsible when their undoubted date of obsolescence arrives."
SE-53480958	"The recycling of the propeller blades that have a life of about 8 years - there is none, so cut into transportable lengths and into the local land fill at the local ratepayers expense"
SE-53774210	"In the end, will the iconic landscapes of New England be littered with outdated technology because no one can afford to dispose of the massive concrete bases and non- recyclable blades? Where does the responsibility lie? Why don't renewable projects have decommissioning and rehabilitation funds or bonds in place as a legal requirement of development like the mining industry? If the cost is so high, perhaps this is the wrong technology in the wrong place. Winterbourne has stated that it intends to avoid any contribution to a bond, until they decide this 'might' be necessary. It is very necessary. What right have any investors to destroy our landscape forever."
SE-53441464	"-the future. Ours is a family farm which we hope to pass onto our son. We do not want him in the future to have to be dealing with the environmental effects of turbine blades in landfill because they can't be recycled or the expense of decommissioning turbines (approx. \$380,000 per turbine) because they are obsolete technology. Winterbourne Wind Farm will spoil Walcha's natural landscape, damage our local environment, divide our tight community & ruin our children's future."

A Decommissioning and Rehabilitation Assessment (DRA) was submitted with the EIS (Appendix S) and included an estimate for the decommissioning and rehabilitation costs. The DRA proposes that when the plant is decommissioned, the WTGs and associated infrastructure would likely be demolished (rather than dismantled) and then sold for scrap. The value of scrap metal is not insignificant. The analysis in the DRA demonstrates that the salvage value of scrap metal would be more than sufficient to offset the decommissioning and rehabilitation costs.

As part of the DRA, the Applicant proposed the following measures to cover any potential future shortfall in the decommissioning cost:

- Undertake an annual assessment of the remaining life of the Project, starting in Year 15;
- When it is determined that the remaining economic life of the Project is less than 6 years, update the DRA to identify the expected decommissioning methodology and anticipated cost; and
- If a shortfall (cost) is identified, establish a dedicated decommissioning reserve fund to cover the decommissioning and rehabilitation cost of the wind farm. This reserve will be established out of operating cashflows, with an appropriate percentage of cash generated by the wind farm directed into this reserve over an annual basis, until the reserve is fully cash funded, based on the most recent estimate of decommissioning and rehabilitation costs.

The above mitigation measures are considered sufficient to ensure there are adequate resources available to cover the decommissioning costs.

5.2.13 TELECOMMUNICATIONS

Submitter ID	Example Text from Submission
SE-53473505	"Walcha already has very poor telecommunications, especially in the Winterbourne / Moona Area. Many residents have added a booster system to their roof to enhance mobile reception and they rely on satellite internet. This is their only source of communication as the telephone landline has been made redundant in the area and [is] no longer connected. Mobile phones are relied on for all communication, including calling emergency services. Satellite internet is used for all business operations. Farming is the 2 nd most dangerous occupation, and therefore it is essential that everyone has reliable mobile reception. The slightest degradation in mobile phone reception could mean the difference between being able to make a life saving 000 call, or not."

Impacts to telecommunications were assessed as part of the EIS. The submissions by NSW Telco Authority raised concerns about potential impact of five (5) turbines on one of their point-to-point links. The Applicant has since refined the Project design, relocating those turbines in consultation with NSW Telco Authority to avoid such impacts. NSW Telco Authority has advised that the new turbine locations are acceptable.

5.2.14 HUMAN HEALTH

Submitter ID	Example Text from Submission
SE-54206707	"Health ramifications – dust pollution, carcinogenic issues with BPA, EMF's, blade flicker...are just some of the negative health effects of the wind turbines on the residents in and around Walcha."
SE-53681484	"....the negative effect of high-tension wires with their electromagnetic radiation will cause serious consequences with livestock and people..."
SE-53528957	"...what about research highlighting concern for [physical] health impacts including from blade flicker and noise - that the EIS doesn't adequately address?"

The *National Health Medical Research Council (NHMRC) Statement: Evidence on Wind Farms and Human Health* provides advice to the community and to policy makers regarding the potential impact of wind farms to human health. While it is acknowledged that there are limitations to the existing evidence, NHMRC has concluded that there is currently no consistent evidence that wind farms cause adverse health effects in humans.

In November 2019, the South Australia Supreme Court handed down its decision in relation to the proposed Palmer Wind Farm. The Court concluded that claims that the turbines would cause sickness and health issues for residents were unsubstantiated. Of note, the objectors did not provide sufficient evidence of causality from any expert medical witness. The Court's finding has been consistent with the Australian Energy Infrastructure Commissioner's observations and recommendations based on actual complaint experience (Australian Energy Infrastructure Commissioner, 2022).

Section 6.5.6 of the EIS addresses EMF from transmission lines, substations and switching stations. Based on the available data, the EMF from transmission lines and substations, based on likely exposure scenarios, are well within acceptable levels. As a precautionary approach, the locations of Project infrastructure (e.g., substations, switching station, transmission line) have been sited at a distance from dwellings and publicly accessible locations to guarantee that potential EMF exposure from Project infrastructure will be negligible.

5.2.15 AIR QUALITY

5.2.15.1 DUST

Submitter ID	Example Text from Submission
SE-53454247	[Paraphrased] Concerned about dust inhalation during construction of the towers.

The Construction Environmental Management Plan will address the management and mitigation of offsite dust emissions. Mitigation measures relating to dust have been included in Section 6.10.4 of the EIS for inclusion in the Construction Environmental Management Plan. This includes the minimisation of dust emissions from exposed areas through the application of water and/or dust suppressants using a water cart. The Applicant will adhere to any conditions of the development consent for the Project pertaining to air quality and dust.

5.2.16 CUMULATIVE IMPACTS

Submitter ID	Example Text from Submission
SE-53774210	"If a number of the proposed projects (including Winterbourne) in the Walcha district are accepted, it will result in a significant cumulative effect particularly regarding... the destruction of our roads. How badly will this affect our country lifestyle and general health?"
SE-53474212	"I am very concerned about the massive increase in heavy vehicle traffic that this project and several other projects will cumulatively cause over the next several years. I regularly travel through the Liverpool Plains, Nundle, Uralla, Tamworth, New England, Singleton, Newcastle areas to visit my children and grandchildren in Northern NSW and in the Central Coast. With possibly thousands of extra light and very heavy vehicle movements each day my already long travel times will be increased as well as being significantly more dangerous. The condition of the Golden and New England Highways are bad enough at the best of times but the transport of extremely large and heavy wind turbine towers and blades, as well as Lithium batteries, inverters, etc. will make them significantly worse. Road repairs will increase and so journey times will blow out substantially. The proposal should not be approved."
SE-53714211	"It will have a cumulative NEGATIVE IMPACT on Walcha, a small rural town including road congestions, road destruction, noise, dust, draining of local resources, added burdens on healthcare and accommodation."
SE-53818479	"There is a cumulative impact - in that there is a congregation of proposed projects, in one small shire.... our small shire. There is a compounding effect, having them in one area. There is basically one road in and one road out. One road over to the coast. Roads and traffic is going to be of major concern. The number of truck movements are 22,000 over the life of the project, of which 83% are heavy vehicle loads. How do we manage our roads, project after project? The cumulative effect of these projects are particularly important."
SE-53736712	"The cumulative impact of the numerous project needs to be taken into account. At last count there are eight projects with estimates of 495 wind turbines just for the Walcha district. The congestion of the road network will be ongoing for many years creating major disruption and financial loss to our business and many others."

When preparing the EIS for the Project, there were 23 relevant projects assessed for potential cumulative impacts. This included projects undergoing assessment, in construction and operational. These projects were located (or proposed to be located) between 13 km and 150 km from the Project and included wind energy, solar energy, standalone BESS, and pumped hydro energy storage.

Since exhibition of the Project EIS, additional projects have been proposed, and the status of those assessed in the Project EIS has changed. Specifically (as of 10 September 2024):

- Thunderbolt Wind Farm (Determination [Approved]);
- Hills of Gold Wind Farm (Determination [Approved]);
- Bowmans Creek Wind Farm (Determination [Approved]);
- Salisbury Solar Farm (Withdrawn);
- Thunderbolt Solar Farm (Withdrawn);
- Oxley Solar Farm (Determination [Approved]);
- Bendemeer Solar Farm (In Planning [Response to Submissions]);

- Metz Solar Farm (Operational);
- Middlebrook Solar Farm (In Planning [Assessment]);
- Sundown Solar Farm (In Planning [Response to Submissions]);
- Eathorpe BESS (In Planning [Prepare EIS]);
- Oven Mountain Pumped Hydro Energy Storage (In Planning [Response to Submissions]);
- Dungowan Dam (Withdrawn);
- Tamworth BESS (In planning [Response to Submissions]);
- Nottingham Park Solar Farm (In Planning [Prepare EIS]); and
- Kingswood BESS (In Planning [Prepare EIS]).

Based on the submissions received, the main concerns in the context of cumulative impacts relate to:

- Social impacts: accommodation for the temporary workers will be required for the construction phase of the Project, which may overlap with the construction periods of other projects proposed within the region.
- Traffic and transport: traffic generated during the construction phase for projects may overlap and interact with the townships of Tamworth and Armidale, where staff associated with multiple projects are anticipated to be located; and

For other impacts (e.g., including but not limited to, biodiversity, aviation) the distances between the Project and relevant other projects have led to a conclusion that cumulative impacts are not anticipated.

SOCIAL

An updated assessment of cumulative impacts has been included in the Addendum SIA, which includes consideration of cumulative traffic and transport impacts.

The Addendum SIA determined that the capacity within the region was sufficient for accommodation of workers sourced locally (from Tamworth and Armidale). The Project has set a target of approximately a third of the Project to source local employment. If additional workers are required, there is sufficient capacity in both the existing housing stock and short-term accommodation providers to accommodate these workers. The Addendum SIA (refer Appendix J of the Amendment Report) noted that the LGA's included in the New England Northwest tourism region had an occupancy rate of 55.1% in 2018/19 (STR, 2019). In 2021, the total number of dwellings in the social locality was 31,237 (ABS, 2021). As of March 2022, this occupancy rate had slightly decreased to 54.9% (STR, 2022). In 2021, Armidale and Tamworth Urban Centres and Localities (UCLs) had 965 and 1,300 unoccupied private dwellings respectively (ABS, 2021). The above data sets and trends in the social locality suggest there is sufficient capacity to accommodate worker influx if the aspirational local recruitment target is not achieved.

The construction workforce will be accommodated across the local social locality and within the larger regional centres of Armidale and Tamworth as required. Given the number of other renewables projects, there also remains the potential that the aspirational localised employment targets set by the Project and/or other projects may not be able to be achieved due to lack of available resources. If these aspirational localised employment targets are not achieved, a larger number of non-local workers will need to be employed to meet demand. If this occurs, the social impacts associated with worker influx may be further exacerbated. The cumulative impacts associated with workforce accommodation influx will be addressed through the implementation of a Workforce Accommodation Strategy, and the associated mitigation and management measures.

While the Addendum SIA notes that increased accommodation will have an impact on services within the community (e.g., emergency services, recreational facilities, etc.) will be temporary and can be mitigated through engagement with local health care, social and emergency service providers to monitor the Project's impact (if any) on these facilities.

The Applicant will implement additional controls to reduce the cumulative impacts experienced through the following measures:

- Collaboration with local trade and trading organisations to promote skill growth in key industries and address local skill shortages;
- Engagement with key stakeholders to source local material where possible and to anticipated shortage as they may arise;
- Development of relationships with local businesses to create a transparent tendering process that enables the procurement of local goods and services; and
- Monitoring of local markets for goods and services to understand the shortages and competitive pressures arising from the Project, as well as potential procurement measures that can be implemented to reduce these pressures.

The social impacts of cumulative traffic, visual and health and well-being were also considered in the Addendum SIA. The implementation of a grievance mechanism and a Stakeholder Engagement Strategy will be maintained throughout the life of the Project to manage impacts relating to health and wellbeing as a result of stress.

It was considered that the implementation of mitigation measures, such as visual screening, supplementary planting and turbine finishes would significantly reduce the visual impact of wind turbines within the New England region.

Notwithstanding the cumulative impacts from the Project, there will also be significant investment opportunities presented to the region through the development of the Project, including through indirect and direct employment opportunities, accommodation providers and incidental spending within the local area.

TRAFFIC

When considering cumulative impacts for traffic, it is important to consider whether construction periods of multiple projects will overlap, in particular peak construction period for projects. It is also important to understand that the community may experience construction fatigue if the construction period of multiple projects overlap, and/or if the construction of a project begins shortly after another has ended.

Prior to construction, a Construction Traffic Management Plan will be prepared and will further assess cumulative traffic impacts which will more accurately reflect future conditions (e.g., traffic volumes, construction timeframes of nearby projects) and will include measures to reduce cumulative impact where relevant, including coordination of OSOM vehicle movements to minimise impacts.

The Construction Traffic Management Plan will be prepared to the satisfaction of the Secretary and will be prepared in consultation with the relevant local councils. The plan will also be prepared in accordance with the Cumulative Impact Assessment Guidelines for State Significant Projects, and at minimum, will incorporate the measures documented in Section 6.4.6 of the EIS.

The Amended TIA conducted additional SIDRA modelling for key intersections along the Oxley Highway, including an assessment of cumulative traffic impacts within the surrounding area that are likely to have overlapping construction periods (Bendemeer Solar Farm, Thunderbolt Wind Farm and Tilbuster Solar Farm). The Amended TIA concluded that there were no cumulative traffic impacts expected along Thunderbolts Way, and that the road network could readily accommodate additional vehicle movements along the Oxley Highway (based on publicly available traffic volumes from other projects).

5.3 THE PROJECT

There were 216 total submissions raised regarding the Project location, scale and layout.

5.3.1 PROXIMITY TO WALCHA TOWNSHIP

Submitter ID	Example Text from Submission
SE-51015768	"Walcha is ideally placed due to reliable winds and proximity to power grid."
SE-53385460	"Turbines are being put in front of people's homes."
SE-53688462	"With so many turbines in close proximity to the town, the residents of Walcha are going to be able to hear the noise of the turbines particularly on still winters days and nights."
SE-53811457	"We were shocked to find out in 2020 that our farm would be located at the centre of the proposed Winterbourne Wind project."
SE-53729957	"The scale and proximity to Walcha cannot be fully appreciated until after construction, and by then it will all be too late."
SE-53743977	"Poor Site Selection - Vestas has failed to consider feasible alternatives to Walcha as the site for the project. It is my understanding that they are not meeting statutory obligations which is grave concern. Walcha is surrounded by some of the best agricultural land in the nation and this project flies in the face of any strategic land use planning and protecting/maintaining high quality agricultural land."
SE-53499990	"I feel that given that Walcha is in relatively close proximity to the huge transmission lines in the Hunter, someone in Sydney or Canberra with the stroke of a pen has circled this district as an easy fix to the global push towards zero emissions."

Submitter ID	Example Text from Submission
SE-53743957	"Walcha is small rural town where agricultural land is of the highest quality and this drives the town economically and socially with many community events staged to support and grow our town. I feel that the introduction of such a project will divide and suffocate the town."
SE-53778735	"I object to the project due to the proximity of the wind farm to my family property."

Since the conception of the Project, the Applicant has worked to reduce potential impacts of the Project on the local community.

From a visual impact perspective, the closest WTG to the centre of Walcha is approximately 6.5 km. With intervening topography and vegetation, the LVIA determined that views to the Project from the township would only occur in one 60-degree sector. The LVIA concluded that "Distant views toward the Project are likely to be visible from cleared, elevated positions within the LCU. The Project is unlikely to significantly alter or disrupt the identified key landscape features of [Walcha]."

The NIA prepared for the EIS (ERM, 2022) and the Amended NIA (Appendix G of the Amendment Report) both concluded that noise from the Project would not result in adverse noise impacts in the township of Walcha. More significantly, the Project was assessed to achieve operational noise criteria at all sensitive receivers without the application of mitigation measures.

Regarding agricultural productivity, the EIS concluded that the Project would not significantly impact agricultural production within the Project Area. The Applicant and associated landowners intend to continue agricultural productivity, as currently managed, across most of the Project Area.

5.3.2 SCALE OF THE PROJECT

Submitter ID	Example Text from Submission
SE-53447962	"Disproportionate number of huge turbines for population of Walcha"
SE-53277957	"The project as it is currently envisaged will contain 119 of the largest wind turbines ever built in Australia. Because they are one of the first of their type, there is no indication of how loud the turbines might actually be. The EIS data is an extrapolation of current turbines and may be of little relevance to the ones proposed. Why can't the turbines be smaller?"
SE-53278476	"I believe the size of the project is too large for our area and should be scaled down to about 10 percent of the current size."

The scale of the Project has been optimised based on available wind resources, proximity to the transmission network, the relatively low level of environmental and social impacts, and the urgent requirement for a transition to renewable energy, and particularly wind energy, in NSW and Australia. The Project has been designed to minimise impacts to surrounding landowners and the broader community, and the Project will deliver significant economic boost to the local and regional economy and the Walcha and Uralla Shire LGAs through the CBFs.

5.4 PROCEDURAL MATTERS

There were 160 submissions that were raised regarding procedural matters for the Project including consultation and the assessment process.

5.4.1 COMMUNITY ENGAGEMENT

5.4.1.1 CONSULTATION PROCESS

Submitter ID	Example Text from Submission
SE-51018476	"This project has enjoyed a long and widely canvassed consultation process with no surprises in the communities of Walcha and Uralla"
SE-54246963	"As a host Landowner I would like to point out that the process of negotiations and communication with the developer has been very open and fair over many years. The developer has done a great job with community consultation especially within the strict COVID restrictions. During this period there were 11 double page Project Updates published in the local Advocate with plenty of detail about where the project was up to each time. Once the COVID restrictions were lifted they also held two 2Day open days at the local Bowling club where everyone in the community was invited to come along and see where the project was up to and to ask any questions they may have had in relation to the project. The developer was also able to have a stall at the local show for the last 3 years running with lots of information about the project being available to everyone in the community."
SE-53602215	"I can see how Vestas and Walcha wind has taken advantage of their financial situations coming out of droughts and provided financial encouragement to sign contracts without readying them. These contracts have lead to in wanted decisions on our fitness behalf's that they have not intended on. This is a disgraceful example of manipulation from such a huge company for their own financial gain."
SE-53745207	"developer has not engaged with community in a meaningful and respectful manner. They have used bully tactics, provided inadequate or misleading information to the community, neighbours and hosts and, simply have been unavailable to answer questions or attend meetings. This behavior suggests poor future behavior"
SE-53737297	"I feel this EIS has had inadequate consultation with our whole community, the indigenous and non-indigenous communities, the landowners or the business owners in our community."
SE-53475981	"The developer has not been appropriately forthcoming with our community. Everything has been so shrouded in secrecy to the point we as a community have formed a group to help uncover some of the outlines of the project. Trying to get information and answers out of the developer is like getting blood out of a stone. In fact, for the vast majority of the duration of the EIS submission period the developers office phone has gone directly to an answering machine (how convenient)."

Table 5-2 (Engagement Approach) and Table 5-3 (Summary of Community Consultation) of the EIS document the extensive consultation which has been undertaken by the Project team with the community prior to and during preparation of the EIS. **Section 3.1** of this Submissions Report documents the stakeholder engagement which has taken place since exhibition of the EIS.

The Project team hosted a booth at the Walcha Show yearly since 2020, a booth at the 2021 Walcha Farmers Market, and hosted Community Open Days in 2021 and 2022 at the local bowling club in Walcha, as well as a street stall in Uralla in 2024. Enquiries, feedback and complaints can be made through the contact number (1800 252 040), by email or through the website. These engagements are recorded and managed in a central database which captures contact details and information about the enquiry or complaint. The Project team are responsible for responding as required and all responses, actions arising and closure of enquires, and complaints are recorded. The Applicant maintains that engagement conducted with the community during development of the Project has been genuine and has been in accordance with the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, 2024). Staffing of the local Project office has been subject to the availability of the Project team.

5.4.1.2 CONSULTATION WITH TRADITIONAL OWNERS

Submitter ID	Example Text from Submission
SE-53532715	"Aboriginal Perspective - for me we are going down the track of taking aboriginal land and culture again due to no consultation with the correct traditional first nations people of the site of this development. The Dunghutti people have not been consulted and the ACHAR was completed with limited consultation of first nations people."
SE-53821972	"Proponents refused to attend any community engagement they had been invited to with concerned residents and refused to consult the correct First Nations tribes even after they learnt that they had not consulted the traditional custodians."

The Aboriginal cultural heritage assessment of the Project was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* published by the Department of Environment, Climate Change and Water (2010), as required by the Project SEARs. A record of consultation with traditional owners is provided as Appendix 3 of the revised Aboriginal Cultural Heritage and Assessment Report (provided as Appendix E to the Amendment report).

5.4.1.3 QUALITY OF ASSESSMENT

Submitter ID	Example Text from Submission
SE-53774212	"The EIS is error ridden, incomplete and has many misrepresentations. I think the developer has done a very poor job of preparing these reports for the community to read, analyse and form an opinion from."
SE-53385460	"The EIS document put out by Winterbourne Wind is obtuse, poorly written and incorrect in several aspects. An appendices shows "views of the turbines" from behind a tree? I am surprised this was allowed to be published with so many errors and regarding such a large-scale project."

Submitter ID	Example Text from Submission
SE-53726475	"This EIS has so many glaring errors and appears to be simply a copy-paste job by an extremely junior member of the developers team. The errors and misjudgements made by the developer have left a vibrant community splitting at the seams, have the potential to adversely impact some of the world's most productive farming land as well as spoiling some of NSW most pristine and beautiful national parks, which are crucial for the biodiversity needed to fight climate change."
SE-53451022	"The lack of care and errors in the EIS documents indicate the lack of concern Vestas has for the valuable land and the biodiversity that lives with in it. Their failure to inform the community of the project in an open and transparent way has also been a large concern. The bare minimum to meet their requirements."
SE-53475981	"It's astounding that the environmental studies were conducted during a period of drought, the largest drought in living memory in these parts. I implore the developer to return now, I'm sure the results would be tipped on their head to truly divulge the environmental destruction to our local flora and fauna."
SE-53618541	"I object to this project for these reasons • It will have a detrimental impact on our water resources. • There is no waste management plans. • There is no Historical Heritage management plans. • There is no soil and storm water plan. • The transport management plan is inadequate."
SE-53729722	"The scale of the maps used in the EIS are inadequate, with many roads names not included, making it difficult to pinpoint locations of turbines and transmission lines."

Assessment of the Project has been prepared in accordance with NSW and Commonwealth legislation and guidelines supplemented by industry standards including that of Australian Standards and the International Organisation for Standardisation. Additionally, the Scoping Report, EIS, Amendment Report and this Submissions Report have been prepared with consideration of the applicable SSD guidelines prepared by the Planning Secretary, including the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, 2024). All technical assessments have been undertaken in accordance with relevant guidelines and by suitably qualified and experienced experts. The Scoping Report, EIS and associated technical assessments were prepared in consultation with relevant government agencies.

If approved, management plans for the Project will be developed to manage the impacts that have been identified. This commitment was made in the EIS.

During the consultation process and public exhibition, DPE (now DPHI) and other government agencies have requested further information and assessment regarding specific issues. Agency advice and responses are provided in **Section 4**.

5.5 BEYOND THE SCOPE OF THE PROJECT

5.5.1 PROJECT OWNERSHIP

Submitter ID	Example Text from Submission
SE-53741485	"Wind monitoring began in 2009 and early site layouts and investigations were undertaken. The community engagement process began at that time, along with a presentation to Walcha Council in 2010. The Winterbourne Wind development site was sold to Vestas (a Danish company, the largest wind turbine manufacturer in the world) in 2019 who have taken the development through the planning process to the EIS"
SE-53447962	"Unknown and seemingly invisible foreign company ownership"
SE-53747208	"The multi layered ownership of the company is a concern from the perspective of compliance to development consent conditions and keeping promises made to landowners and the community. The majority owner of the project is an offshore mega company that has consulted extremely poorly to the community and major stakeholders during the planning and EIS stage of the project."
SE-53818479	"...the developer is inexperienced, foreign owned and uses fully imported products (That will have a 25 year life span) from their own company."
SE-53212967	"Who is accountable for the structures should the project/developer go bankrupt? Whatever the outcome of the proposed project, I believe that this should be a central consideration in protecting the producers and community against this scenario."
SE-53821972	"...where is their disposal and removal plan? Who will be responsible for this, and how will it be funded? ...the proponents at best give a tokenistic surety for their removal which is not even close to the cost, and even this paltry amount is opaque to it's efficacy if and when the ownership of the wind farm changes"
SE-53720460	"MirusWind t/a WalchaEnergy 2003 WalchaWind formed 2004 WalchaEnergy sells 95% Winterbourne Wind to Vestas 2019 Vestas sells shares to Copenhagen Infrastructure Partners (CIP) 2022"

The Applicant for the Project is WinterbourneWind Pty Ltd (ABN 59 113 000 150).

In June 2019, Wind Power Invest (WPI), a wholly owned subsidiary of global wind energy company Vestas, acquired a 95% stake in WinterbourneWind Pty Ltd from MirusWind Pty Ltd, which began developing concepts for the Project in 2004.

In December 2022, Copenhagen Infrastructure IV, a fund managed by Copenhagen Infrastructure Partners (CIP), completed acquisition of Vestas' shareholding in the Project.

Vestas will continue to be responsible for Project development and will be responsible for the supply, construction and long-term maintenance of the Project. CIP's ownership of the Project will enable funding to be available to construct the Project once all key development activities for the wind farm have been completed.

Vestas is accredited to the Environmental Management System Standard ISO 14001:2015 for the sales, development, manufacture, installation, commissioning, training, service and maintenance of Sustainable Energy Solutions.

Vestas operates a certified integrated management system to manage risk and drive continuous improvement of business performance. Vestas satisfies applicable legal and voluntary requirements and ensure transparency in its quality, occupational health and safety, and environmental performance.

Vestas' environmental policy commits the company to:

- Prevent pollution and protect the environment in all aspects of the business;
- Demonstrate environmental vigilance by taking a life cycle approach in the development, planning and execution of operations, products and services; and
- Engage customers, employees, contractors, suppliers and other stakeholders through dialogue and training to meet or exceed environmental standards and ensure environmental protection as a pre-requisite to doing business.

Vestas is a leader in wind farm design with global experience at delivering utility-scale projects and is capable of the successful delivery of the Project.

5.5.2 NEW ENGLAND REZ

Submitter ID	Example Text from Submission
SE-51219207	"Winterbourne is a vital part of the Walcha Energy bigger vision of solar farms, wind farms and hopefully batteries and pumped hydro in the New England Renewable Energy Zone"
SE-53535964	"The Winterbourne Wind farm development is a critical link in the future of renewable energy production in Australia and even more importantly, the New England REZ"
SE-53451022	"There are several developers in the Walcha and Uralla Shires wishing to undertake similar projects. The REZ will significantly change the New England and the cumulative impact of these projects is too much in the one place. Winterbourne is not in the right place and will and has already created distrust between neighbours and friends in a small community."
SE-53472778	"The Winterbourne Wind Farm is just one of many turbine projects being considered for the Walcha LGA. As such, this project will set a precedent for future projects. The cumulative affect of all proposed wind farms must be taken into account when assessing the Winterbourne Wind Farm project."
SE-53814475	"Energy Co failed to engage with the New England community prior to declaring the New England Renewable Energy Zone. Declaring rural areas REZs is a total betrayal of rural communities and has resulted in multiple developments with no consideration of cumulative effects on the region."
SE-51765457	"The unacceptable impacts of the project on the broader environment and community include the cumulative impacts of this project in concert with other state significant renewable energy projects in the region and the New England REZ. The proponent has not adequately addressed the cumulative impacts in their EIS."
SE-53316709	"The scale of development across the New England is overwhelming. There has been no clear work conducted to assess the holistic impact to the community. I ask that a moratorium on any further developments in renewable energy across the state of new south wales should be implemented until impacts of scale and social cost to regional areas are assessed. There is a need to progress slowly and smartly to minimise the impact of transition to new forms of energy and to take account of the impacts of dislocation of social structures and environmental impacts."

The cumulative impact assessment only considers relevant future projects that are available in the public domain (i.e., the DPHI Major Projects website). A review of the DPHI Major Projects website was completed on 10 September 2024 to update the status of projects previously considered in the cumulative impact assessment and consider any new relevant future projects which have become publicly available since exhibition of the Project EIS. This update is provided in Section 6.11 of the Amendment Report (ERM, 2024).

6. UPDATED PROJECT EVALUATION

6.1 PROJECT BENEFITS

Australia and the world are in the process of transitioning from traditional fossil fuel generation. Wind energy is a clean and inexhaustible resource that generates zero pollution or carbon emissions during operation (U.S. Energy Information Administration, 2021). Wind energy is now cheaper than new generation from coal and natural gas, and together with solar and other renewable energy projects, wind energy is helping to drive down the cost of wholesale electricity (CSIRO, 2024).

Compared to traditional energy sources such as coal and gas, wind farms:

- Require no invasive mining, extraction or burning of fossil fuels during operations;
- Emit no greenhouse gas during operations;
- Emit no fine particle pollution, sulphur dioxide, or oxides of nitrogen during operations;
- Require no water during operations;
- Have limited environmental impacts from construction; and
- Typically offset all emissions generated across the turbine lifecycle in the first year of plant operation (Vestas, 2021).

The Project, as amended, is expected to generate around 2,100,000 megawatt hours (MWh) per year of clean, renewable energy — enough to power more than 375,000 NSW homes on average. The Project will deliver renewable, low-cost energy to the national grid and contribute to the NSW Government's net-zero emissions target by 2050. The Project will further provide a significant amount of the new generation capacity required as coal-fired power stations are retired over the next decade, including the 2,880 MW Eraring Power Station (scheduled to close in 2027).

The Project will primarily be developed on agricultural land which has been previously disturbed and/or historically cleared. Wind farms are very much compatible with existing farming operations as the turbines occupy only a small amount of land, and landowners can continue normal grazing or cropping activities. Livestock has often been seen using turbine towers for shade and shelter from wind and rain.

The Project layout has been designed and revised to maximise the use of existing disturbed areas and to avoid or minimise impacts, including to identified biodiversity and Aboriginal cultural heritage values. Progressive design iterations for the turbines, ancillary infrastructure, and the transmission line corridor have continued with key drivers being measures to minimise and avoid environmental and social impacts in line with the Avoid-Minimise-Mitigate-Offset design hierarchy.

The Project will create a range of social and economic benefits which will create substantial capital investment in Walcha and Uralla and the broader New England region. The Project is anticipated to generate up to 390 FTE construction jobs, in turn creating approximately \$150 million in direct wages and profits, and more than \$160 million in indirect wages and profits, per year of construction. The construction workforce will generate more economic activity at local restaurants, shops and businesses, and will possibly lead to higher occupancy rates in temporary accommodation.

During Project operations, the Project will generate up to 16 FTE jobs and \$25 million per year in direct and indirect economic benefit for the local region. The Applicant will operate and maintain the WTGs and other infrastructure to ensure safe and efficient facilities that optimise energy generation. The Project service team will include around 16 skilled staff permanently based in Walcha or surrounding towns, who will become part of the local community.

There will be opportunities for local contractors and businesses to supply services during Project construction and operation. The Project will offer training and development to upskill the regional workforce to support the growing renewable energy industry.

The Project will further provide a diversified income stream for host landholders which will help make host farms more resilient to the impacts of droughts, fires and commodity price fluctuations.

A VPA has been entered into between the Applicant, Walcha Council and Uralla Shire Council. Under the VPA, the Applicant is to allocate funds to two CBFs for the purpose of providing funding within the Walcha and Uralla Shire LGAs.

The employment and economic opportunities created by the Project have been generally supported by the community during engagement and consultation activities.

During construction, the Applicant will work closely with contractors, local communities, neighbours and local councils, to plan and manage construction to minimise disturbance. Construction management will include:

- Regular and ongoing communication with the community;
- Working during standard construction hours as much as possible;
- Communicating with affected stakeholders where it may be necessary to work outside standard hours, or where work is expected to be disruptive;
- A rigorous safety culture; and
- Environmental monitoring.

Through the implementation of best practice management, the potential environmental impacts associated with the Project can be appropriately managed, which will also address the community concerns and associated social impacts identified during the stakeholder engagement process.

Given the net benefit and commitment from the Applicant to appropriately manage the potential environmental impacts associated with the Project, it is considered the Project would result in a net benefit to the Walcha and Uralla locality, New England region and broader NSW community.

6.2 CONSISTENCY WITH COMMUNITY VIEWS

Many of the submissions in support of the Project recognised the need to transition our energy sector to renewable energy generation. Other key benefits raised in public submissions of support included:

- The Project would assist NSW and Australia transition to an alternative, low-carbon energy supply using renewable resources, and in turn minimise the impacts of climate change;
- The location of the Project was well selected in proximity to existing transmission infrastructure and in an area that has excellent wind resource;
- The Project stakeholder consultation process was inclusive and informative, with ample information made available for individuals interested in learning more about the Project;
- The developer was a responsible company that had generated trust within the community through the development and implementation of a Community Consultation Plan; and
- Feedback from the consultation sessions was incorporated into the Project design.

Submissions in objection to the Project raised concerns regarding the location of the New England REZ, arguing that renewable energy should be developed closer to the State's large population centres where there is higher demand for electricity. Many also suggested alternate energy generation technologies, such as nuclear, should be considered rather than developing wind farms.

Throughout the development of the EIS, the Applicant has conducted engagement activities with a range of stakeholders including NSW and Federal Government agencies, the surrounding community and community groups, Aboriginal groups, proximate landholders and infrastructure owners (refer Appendix E of the EIS). These engagement activities have continued since EIS exhibition to discuss the amendments to the Project layout and to address potential concerns, opportunities and mitigation strategies, as described in **Section 3**. The Applicant will continue to work with the community to address any concerns.

6.3 CONSISTENCY WITH STRATEGIC CONTEXT

The Project is consistent with key international, Federal and State government commitments on climate change and emissions reduction for the following reasons:

- Increased adoption of renewable energy generation sources will assist Australia to transition from traditional fossil fuel energy production, which is linked to atmospheric pollution, water pollution, land pollution and human health impacts;
- Reducing carbon emissions through replacement of traditional energy sources with renewable energy will assist to slow the effects of climate change, benefitting current and future generations in line with the principles of Ecologically Sustainable Development;
- The Project Area is situated within a State declared REZ due to its excellent renewable energy resources; and
- The Project will have a generation capacity of approximately 700 MW and will generate sufficient energy on an annual basis to supply over 375,000 average NSW homes.

6.4 ACTION TAKEN TO AVOID/MINIMISE IMPACTS

The layout of the Project and siting of WTGs and other key infrastructure components has been subject to an ongoing iterative design and siting process, considering environmental, civil engineering and wind generation constraints and opportunities, as well as consideration of issues raised during ongoing community engagement.

The Applicant has engaged with landowners, Project neighbours, the broader community, local government, State and Federal Government agencies, and business and stakeholder groups since acquisition of the Project in 2019.

Throughout the planning phase of the Project, a range of alternative Project designs have been considered in the context of technical, environmental, social, and commercial constraints. Following the exhibition of the EIS the Project has been amended to:

- Further avoid and/or minimise adverse environmental impacts;
- Protect sensitive areas and receivers identified through specialist assessments including biodiversity, noise, visual, heritage, hazards and risks, and water;
- Address matters raised in submissions of the exhibited Project EIS and outcomes of ongoing engagement with the community, landowners, government agencies, local council and other stakeholders;
- Maximise the yield of wind power generation through suitable positioning of WTGs on-site and in consideration of environmental constraints;
- Maintain minimum Project generation capacity to achieve commercial viability of the Project in the context of the cost required to connect to the existing electrical grid; and
- Optimise accessibility of Project elements through identifying constructability constraints and strategically positioning Project elements to minimise earthworks required during construction and thereby further reduce potential biodiversity impact.

The Amended Project has:

- Reconfigured the configuration and layout of the WTGS including removing two WTGs and adding one WTG, relocating 21 WTGs (i.e. moved > 100m), micro-siting 52 WTGs (i.e. moved < 100m),
- Realigned site access locations and internal access tracks, and electrical reticulation;
- Relocated both substations, O&M facility, construction compound, BESS and laydown areas;
- Included the construction of on-site quarry to supply gravel, aggregates and potentially bedding material required for Project construction;
- Included the construction of on-site groundwater bores to supply water required for Project construction and operation; and
- Revised transport haulage routes to avoid Oxley Highway for inbound OSOM vehicles.

The Applicant has conducted a rigorous environmental assessment of the Project in accordance with the SEARs. This has included extensive field survey effort by ecologists between August 2020 and January 2024. To assess the impact on Aboriginal and historic cultural heritage, archaeologists and RAPs completed five stages of archaeological fieldwork between July 2020 and January 2024.

Background noise monitoring has further been conducted at several dwellings in the vicinity of the Project between November 2020 and February 2021. These results have been used to predict the expected levels of noise and vibration during wind farm construction (including construction traffic, heavy machinery, rock-crushing, etc.) and wind farm operation (including WTGs and ancillary infrastructure such as substations).

Further, a total of 17 viewpoints were selected for the preparation of photomontages, to best illustrate the potential appearance of the proposed wind farm from varying distances and locations with differing views. This included nine (9) public viewpoints and eight (8) private viewpoint locations based on feedback received from the community. Exact photomontage locations were selected on site to represent a worst-case scenario for the viewpoint location. Localised screening factors such as vegetation were avoided (where possible) to ensure maximum exposure to the Project.

Impacts relating to transport and traffic associated with the Amended Project. The Amended Project avoids using the Oxley Highway for OSOM vehicles and instead these vehicles are proposed to travel along New England Highway to Staces Road south of Uralla. OSOM vehicles will then head east to Thunderbolts Way before continuing south to Walcha. Traffic generation analysis shows that there would be adequate capacity in the road network to accommodate the Amended Project.

The proposed inclusion of an onsite quarry has significantly reduced the number of heavy vehicles travelling on local roads as raw materials for construction can be sourced within the Project Area. Water required for construction of the Project will be sourced from groundwater bores within the Project Area, further reducing the number of heavy vehicles travelling on the local road network.

Five (5) WTGs have been relocated in the Amended Project to avoid potential impacts on point-to-point communication links and radiocommunication towers operated by NSW Telco Authority.

Appendix B of the Amendment Report provides updated management and mitigation measures that would be implemented to avoid or minimise Project-related impacts. The Amended Project provides environmental and social benefits as summarised in the Amendment Report.

7. REFERENCES

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- Moravec, D., Barták, V., Puš, V., & Wild, J. (2018). Wind turbine impact on near-ground air temperature. *Renewable Energy*, 123, 627-633.
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APPENDIX A SUBMISSIONS REGISTER

[illegible]

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-51069720	Support	SOUTH YARRA	VIC																					
SE-51174239	Support	ARTARMON	NSW																					
SE-53732084	Support	AUSTINMER	NSW																					
SE-51087970	Support	GLEBE	NSW																					
SE-51087980	Support	ST IVES	NSW																					
SE-51104207	Support	WOONONA	NSW																					
SE-51225739	Support	AVOCA BEACH	NSW																					
SE-51113957	Support	MERRYLANDS	NSW																					
SE-52317208	Support	AVOCA BEACH	NSW																					
SE-51125958	Support	GORDON	NSW																					
SE-51129960	Support	BEVERLEY PARK	NSW																					
SE-51132707	Support	BALGOWLAH	NSW																					
SE-52724969	Support	BAR BEACH	NSW																					
SE-51135476	Support	EAST FREMANTLE	WA																					
SE-52485463	Support	BAULKHAM HILLS	NSW																					
SE-51162457	Support	BANGOR	NSW																					
SE-51163463	Support	GLENHAVEN	NSW																					
SE-51164528	Support	ROUSE HILL	NSW																					
SE-51164547	Support	NORTH BALGOWLAH	NSW																					
SE-51164549	Support	ROSEBERY	NSW																					
SE-51164567	Support	CASTLE HILL	NSW																					
SE-51452738	Support	BEECROFT	NSW																					
SE-51168221	Support	GORDON	NSW																					
SE-51168471	Support	GORDON	NSW																					
SE-52977466	Support	BELMONT	NSW																					
SE-53492207	Support	BELMONT	NSW																					
SE-51170979	Support	ROSEBERY	NSW																					
SE-51478957	Support	BENTLEIGH EAST	VIC																					
SE-51367228	Support	BERWICK	VIC																					
SE-53767957	Support	BEULAH PARK	SA																					
SE-51174220	Support	MEADOWBANK	NSW																					
SE-51004757	Support	BIRCHGROVE	NSW																					
SE-53791458	Support	BLACKHEATH	NSW																					
SE-51174501	Support	BRAESIDE	VIC																					
SE-51174519	Support	BRAESIDE	VIC																					
SE-51175708	Support	SOUTH YARRA	VIC																					
SE-51175725	Support	SOUTH YARRA	VIC																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-51175728	Support	SOUTH YARRA	VIC																					
SE-52442727	Support	BRONTE	NSW																					
SE-52442728	Support	BRONTE	NSW																					
SE-51188984	Support	WAHROONGA	NSW																					
SE-51208288	Support	ULTIMO	NSW																					
SE-52449962	Support	BRONTE	NSW																					
SE-52451957	Support	BRONTE	NSW																					
SE-51215959	Support	WANTIRNA SOUTH	VIC																					
SE-51217208	Support	WANTIRNA SOUTH	VIC																					
SE-53737322	Support	BUCCA	NSW																					
SE-51219224	Support	ARTARMON	NSW																					
SE-51219242	Support	ARTARMON	NSW																					
SE-51219274	Support	ULTIMO	NSW																					
SE-51224988	Support	ARTARMON	NSW																					
SE-54199707	Support	BUNDANOON	NSW																					
SE-51225763	Support	DARLINGTON	NSW																					
SE-51225779	Support	POINT COOK	VIC																					
SE-53609460	Support	BURWOOD	NSW																					
SE-51235222	Support	ROSE BAY	NSW																					
SE-53847001/SE-54350210	Support	CALOUNDRA	QLD																					
SE-51249207	Support	MOREE	NSW																					
SE-51264457	Support	BURLEIGH HEADS	QLD																					
SE-51169966	Support	CHATSWOOD	NSW																					
SE-51283786	Support	CHERRYBROOK	NSW																					
SE-51280483	Support	TYALGUM	NSW																					
SE-51283752	Support	LABRADOR	QLD																					
SE-51943972	Support	CLEAR ISLAND WATERS	QLD																					
SE-51109457	Support	COLLAROY PLATEAU	NSW																					
SE-51287247	Support	BURWOOD	NSW																					
SE-53500966	Support	COPACABANA	NSW																					
SE-51292210	Support	ZETLAND	NSW																					
SE-51292213	Support	CARLINGFORD	NSW																					
SE-54246965	Support	DAPTO	NSW																					
SE-53685209	Support	DARLINGHURST	NSW																					
SE-51520816	Support	DONCASTER	VIC																					
SE-51321229	Support	EPPING	NSW																					
SE-51321983	Support	HEATHERTON	VIC																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-51325708	Support	DERRINALLUM	VIC																					
SE-52091463	Support	DUBBO	NSW																					
SE-51332710	Support	NOBLE PARK	VIC																					
SE-51171024	Support	EASTWOOD	NSW																					
SE-51333216	Support	MELBOURNE	VIC																					
SE-51333718	Support	HEATHERTON	VIC																					
SE-51335484	Support	SOMERSET	TAS																					
SE-51502207	Support	EDGECLIFF	NSW																					
SE-51335721	Support	ROCKHAMPTON CITY	QLD																					
SE-51171000	Support	EDMONDSON PARK	NSW																					
SE-51344477	Support	SOUTHBANK	VIC																					
SE-51355728	Support	GLEN WAVERLEY	VIC																					
SE-51171005	Support	EDMONDSON PARK	NSW																					
SE-51363719	Support	ELANORA HEIGHTS	NSW																					
SE-51179957	Support	EPPING	NSW																					
SE-51180958	Support	EPPING	NSW																					
SE-51331991	Support	EPPING	NSW																					
SE-51372982	Support	ARTARMON	NSW																					
SE-51382001	Support	ARTARMON	NSW																					
SE-51384256	Support	ROUSE HILL	NSW																					
SE-51384271	Support	BLACKHEATH	NSW																					
SE-51384751	Support	ROSEVILLE	NSW																					
SE-51384982	Support	GLEN WAVERLEY	VIC																					
SE-51405459	Object	DEE WHY	NSW																					
SE-51411723	Support	HomeBUSH	NSW																					
SE-51421957	Support	AVOCA BEACH	NSW																					
SE-51422960	Object	WAGGA WAGGA	NSW																					
SE-51335502	Support	EPPING	NSW																					
SE-51790997	Support	EPPING	NSW																					
SE-53318976	Support	WALCHA	NSW																					
SE-51431472	Support	MCMAHONS POINT	NSW																					
SE-51320708	Support	EURACK	VIC																					
SE-51436234	Support	GLEN WAVERLEY	VIC																					
SE-51439460	Support	PORT MACQUARIE	NSW																					
SE-53792710	Support	EVERTON PARK	QLD																					
SE-53850707	Support	EVERTON PARK	QLD																					
SE-51452460	Support	TURRAMURRA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-52559721	Support	FAULCONBRIDGE	NSW																					
SE-51452787	Support	SYDNEY OLYMPIC PARK	NSW																					
SE-51455221	Support	SYDNEY OLYMPIC PARK	NSW																					
SE-51439488	Support	FITZROY	VIC																					
SE-51168475	Support	FIVE DOCK	NSW																					
SE-53474732	Support	FOOTSCRAY	VIC																					
SE-53658220	Support	FRESHWATER	NSW																					
SE-51479211	Support	SMITHTON	TAS																					
SE-51711213	Support	GLADESVILLE	NSW																					
SE-51482457	Support	HIGHTON	VIC																					
SE-53473502	Support	GLADESVILLE	NSW																					
SE-53623996	Support	GLADESVILLE	NSW																					
SE-53500012	Support	GLADSTONE PARK	VIC																					
SE-51490210	Support	VASSE	WA																					
SE-51491215	Support	ATHERTON	QLD																					
SE-53732086	Support	GLEBE	NSW																					
SE-51483726	Support	GLENWOOD	NSW																					
SE-51507208	Support	REDFERN	NSW																					
SE-51134707	Support	GORDON	NSW																					
SE-51540707	Support	NORTH BALGOWLAH	NSW																					
SE-51550708	Support	KEBBAN	QLD																					
SE-51551709	Support	EAST BALLINA	NSW																					
SE-51553708	Support	CARLINGFORD	NSW																					
SE-51476458	Support	GOULBURN	NSW																					
SE-51483744	Support	GOULBURN	NSW																					
SE-51158959	Support	GRACEVILLE	QLD																					
SE-51744211	Support	LINTON	VIC																					
SE-51361243	Support	GREENACRES	SA																					
SE-52798005	Support	GYMEA	NSW																					
SE-53696208	Support	HABERFIELD	NSW																					
SE-51851726	Object	CAMPBELLTOWN	NSW																					
SE-51886785	Object	CHISHOLM	NSW																					
SE-51886815	Support	ARTARMON	NSW																					
SE-51889519	Support	MOUNT GAMBIER	SA																					
SE-51890728	Support	JINDABYNE	NSW																					
SE-51893971	Object	CHISHOLM	NSW																					
SE-51904478	Support	YAMBA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-52506207	Support	HAMILTON	OS																					
SE-51944714	Support	FAIRY MEADOW	NSW																					
SE-51967558	Object	ASCOT	QLD																					
SE-53849466	Support	HAWTHORNE	NSW																					
SE-51970755	Support	CRESTWOOD	NSW																					
SE-51997711	Support	NEWTOWN	QLD																					
SE-52037710	Support	GLENWOOD	NSW																					
SE-52038457	Support	GLENWOOD	NSW																					
SE-52088707	Support	ALTONA NORTH	VIC																					
SE-51541726	Support	HEATHMONT	VIC																					
SE-52091482	Support	NARRABRI	NSW																					
SE-52126967	Comment	COFFS HARBOUR	NSW																					
SE-53743711	Support	HOLMVIEW	QLD																					
SE-52199957	Support	COBURG	VIC																					
SE-52208463	Support	BOOERIE CREEK	NSW																					
SE-52248958	Support	NEUTRAL BAY	NSW																					
SE-51164764	Support	HORNSBY	NSW																					
SE-52342707	Comment	RYDE	NSW																					
SE-53637207	Support	HUNTERS HILL	NSW																					
SE-52364707	Support	BELLEVUE HILL	NSW																					
SE-52364709	Support	TARRIARO	NSW																					
SE-54200967	Support	INDOOROOPIILLY	QLD																					
SE-54205960	Support	INDOOROOPIILLY	QLD																					
SE-51363721	Support	JUNCTION HILL	NSW																					
SE-51825214	Support	JUNCTION HILL	NSW																					
SE-53631725	Support	KELLYVILLE RIDGE	NSW																					
SE-54198461	Support	KELVIN GROVE	QLD																					
SE-53819233	Support	KILLARA	NSW																					
SE-53824207	Support	KILLARA	NSW																					
SE-51426212	Support	KINCUMBER	NSW																					
SE-52708957	Support	KIRRAWEE	NSW																					
SE-51292207	Support	KOGARAH	NSW																					
SE-53448216	Support	LAKE CATHIE	NSW																					
SE-52647717	Support	GOONELLABAH	NSW																					
SE-53450959	Support	LAKE CATHIE	NSW																					
SE-53454214	Support	LAKE CATHIE	NSW																					
SE-51316221	Support	LANSDOWNE	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-51209458	Support	LATHLAIN	WA																					
SE-51003770	Support	MANGERTON	NSW																					
SE-53739989	Support	MANGERTON	NSW																					
SE-53566463	Support	BONVILLE	NSW																					
SE-52880968	Support	MARGARET RIVER	WA																					
SE-51003737	Support	MANLY	NSW																					
SE-52964961	Support	SOFALA	NSW																					
SE-52966710	Support	WALGETT	NSW																					
SE-53696710	Support	MARRICKVILLE	NSW																					
SE-54244717	Support	MARRICKVILLE	NSW																					
SE-52995237	Support	COOPERNOOK	NSW																					
SE-53002965	Support	COFFS HARBOUR	NSW																					
SE-53040960	Object	LINDFIELD	NSW																					
SE-54244721	Support	MARRICKVILLE	NSW																					
SE-51217996	Support	MASCOT	NSW																					
SE-53352459	Support	MELBOURNE	VIC																					
SE-53175210	Object	KURANDA	QLD																					
SE-51082227	Support	MEREWETHER	NSW																					
SE-53276959	Support	NAMBUCCA HEADS	NSW																					
SE-51287213	Support	MERMAID BEACH	QLD																					
SE-53743730	Support	MINMI	NSW																					
SE-51226708	Support	MORTLAKE	NSW																					
SE-54188982	Support	NARROMINE	NSW																					
SE-54191729	Support	NARROMINE	NSW																					
SE-54216718	Support	NELSONS PLAINS	NSW																					
SE-53379969	Support	THORNBURY	VIC																					
SE-53789254	Support	EAST KILLARA	NSW																					
SE-53446228	Support	GLADESVILLE	NSW																					
SE-51243462	Support	NEWCASTLE	NSW																					
SE-53788707	Support	NEWTOWN	QLD																					
SE-53846997	Support	NEWTOWN	QLD																					
SE-53451052	Object	PARKSIDE	SA																					
SE-51459457	Support	NORTH BALGOWLAH	NSW																					
SE-53723492	Object	WALCHA	NSW																					
SE-53788457	Support	NORTH BALGOWLAH	NSW																					
SE-53471485	Object	WELLINGTON	NSW																					
SE-53475707	Support	NORTH MANLY	NSW																					

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SE-53474212	Object	GULGONG	NSW																					
SE-53474215	Object	GULGONG	NSW																					
SE-53588457	Support	MEREWETHER	NSW																					
SE-51444964	Support	NORTH SYDNEY	NSW																					
SE-51486730	Support	NORTH SYDNEY	NSW																					
SE-53019718	Support	BOTANY	NSW																					
SE-53480958	Object	LEETON	NSW																					
SE-53497476	Support	MOSMAN	NSW																					
SE-53501961	Support	COTTESLOE	WA																					
SE-53502977	Support	MOOROOLBARK	VIC																					
SE-53510957	Support	WARRIEWOOD	NSW																					
SE-53519733	Support	LILYFIELD	NSW																					
SE-51274457	Support	NUNAWADING	VIC																					
SE-53522225	Support	AVOCA BEACH	NSW																					
SE-53524459	Support	AVOCA BEACH	NSW																					
SE-53524966	Support	AVOCA BEACH	NSW																					
SE-53531457	Object	COOLAH	NSW																					
SE-53764486	Support	PANANIA	NSW																					
SE-51211477	Support	PARRAMATTA	NSW																					
SE-53678488	Support	POTTS POINT	NSW																					
SE-52388707	Support	PRINCES HILL	VIC																					
SE-53536463	Support	NORTHBRIDGE	NSW																					
SE-51343719	Support	RANDWICK	NSW																					
SE-54201238	Support	RANDWICK	NSW																					
SE-53543218	Support	MCKINNON	VIC																					
SE-53741999	Support	REDFERN	NSW																					
SE-51123208	Support	RINGWOOD NORTH	VIC																					
SE-53566728	Support	BONVILLE	NSW																					
SE-53583960	Support	AVOCA BEACH	NSW																					
SE-53067753	Support	ROSELANDS	NSW																					
SE-54199463	Support	ROUCHEL	NSW																					
SE-53609462	Object	KUNDABUNG	NSW																					
SE-53609713	Support	SWEDEN	OS																					
SE-53611207	Object	BERYL	NSW																					
SE-51317709	Support	RYDE	NSW																					
SE-53617968	Object	LAURIETON	NSW																					
SE-53357224	Support	RYDE	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-52995227	Support	SAPPHIRE BEACH	NSW																					
SE-54199457	Support	SAPPHIRE BEACH	NSW																					
SE-53797230	Support	SHERWOOD	QLD																					
SE-53740207	Object	WALCHA	NSW																					
SE-53476210	Support	SOUTH LAKE	WA																					
SE-53521242	Support	SOUTH YARRA	VIC																					
SE-51021206	Support	URALLA	NSW																					
SE-52798708	Support	SOUTHBANK	VIC																					
SE-53714751	Support	MANLY	NSW																					
SE-51276207	Support	SPRINGWOOD	NSW																					
SE-53587467	Support	ST IVES	NSW																					
SE-51479458	Support	SURREY HILLS	NSW																					
SE-53694218	Object	LAKE ALBERT	NSW																					
SE-53737252	Support	SURRY HILLS	NSW																					
SE-53800707	Support	THE GAP	QLD																					
SE-53696730	Object	MOLLYMOOK BEACH	NSW																					
SE-53709736	Object	NORTH SHORE	NSW																					
SE-53808210	Support	THE GAP	QLD																					
SE-53714010	Support	WOONONA	NSW																					
SE-53714847	Object	WOOLLOONGABBA	QLD																					
SE-53714852	Object	WOOLLOONGABBA	QLD																					
SE-53846999	Support	THE GAP	QLD																					
SE-53849468	Support	THE GAP	QLD																					
SE-54200467	Support	THE GAP	QLD																					
SE-53726457	Object	NOWRA	NSW																					
SE-54202960	Support	THE GAP	QLD																					
SE-53728220	Support	AVALON BEACH	NSW																					
SE-53729217	Object	PADDINGTON	QLD																					
SE-53729891	Support	MOUNT MITCHELL	NSW																					
SE-53731460	Support	POINT COOK	VIC																					
SE-53731969	Support	YOWRIE	NSW																					
SE-52995233	Object	WALCHA	NSW																					
SE-53002975	Object	WALCHA	NSW																					
SE-54205710	Support	THE GAP	QLD																					
SE-52795208	Support	THE ROCKS	NSW																					
SE-53736729	Object	RYDE	NSW																					
SE-53737218	Support	TARRAWANNA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53806724	Support	TOOWONG	QLD																					
SE-53475979	Object	PARKSIDE	SA																					
SE-53737299	Support	WHITE HILLS	VIC																					
SE-53808219	Support	TOOWONG	QLD																					
SE-51477225	Support	TRUGANINA	VIC																					
SE-53740007	Support	MANGERTON	NSW																					
SE-53740011	Object	COOPERABUNG	NSW																					
SE-51850492	Support	TURRAMURRA	NSW																					
SE-53740782	Object	GOOVIGEN	QLD																					
SE-53740977	Object	PORT MACQUARIE	NSW																					
SE-53741974	Support	WOORAGEE	VIC																					
SE-52158213	Support	TURVEY PARK	NSW																					
SE-51174258	Support	ULTIMO	NSW																					
SE-51970720	Support	VARSITY LAKES	QLD																					
SE-53742017	Support	WOMBARRA	NSW																					
SE-52640724	Support	WAHROONGA	NSW																					
SE-53743973	Support	VALERY	NSW																					
SE-53745225	Object	GEE LONG WEST	VIC																					
SE-53747226	Object	WESTMINSTER	WA																					
SE-53747970	Support	THIRROUL	NSW																					
SE-53748710	Object	PORT MACQUARIE	NSW																					
SE-53768208	Support	SEAFORTH	NSW																					
SE-53773008	Object	BLACKHEATH	NSW																					
SE-53776957	Object	WAVERTON	NSW																					
SE-53729750	Support	WALCHA	NSW																					
SE-53778735	Object	INVERELL	NSW																					
SE-53782456	Object	WAVERTON	NSW																					
SE-53791721	Support	FRESHWATER	NSW																					
SE-53797461	Object	WENTWORTHVILLE	NSW																					
SE-53806963	Object	NORTHBRIDGE	NSW																					
SE-53809734	Support	NORMANHURST	NSW																					
SE-53820480	Object	PARKSIDE	SA																					
SE-53820979	Object	LAKE ALBERT	NSW																					
SE-53846995	Support	WANDOAN	QLD																					
SE-53847219	Support	WANDOAN	QLD																					
SE-51370719	Support	WANTIRNA SOUTH	VIC																					
SE-54232211	Support	WENTWORTH POINT	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53742240	Support	WHITE HILLS	VIC																					
SE-54188980	Support	WOODSTOCK	NSW																					
SE-54195459	Support	WOODSTOCK	NSW																					
SE-51083957	Support	WOOLLAHRA	NSW																					
SE-52964715	Support	WOOLLAHRA	NSW																					
SE-54205713	Object	BALGOWLAH	NSW																					
SE-53496957	Support	WOOLWICH	NSW																					
SE-54205962	Support	BELMONT NORTH	NSW																					
SE-54206707	Object	GREENWICH	NSW																					
SE-54206709	Support	KINGSGROVE	NSW																					
SE-53743487	Support	WOONONA	NSW																					
SE-54206732	Support	BALGOWLAH	NSW																					
SE-54210467	Object	GLENQUARRY	NSW																					
SE-53743458	Support	WOORAGEE	VIC																					
SE-54246961	Support	YAMBA	NSW																					
SE-53675471	Support	YATTALUNGA	NSW																					
SE-53683957	Support	YATTALUNGA	NSW																					
SE-53766207	Support	YOWRIE	NSW																					
SE-53318468	Object	ARDING	NSW																					
SE-53774210	Object	ARDING	NSW																					
SE-53554717	Object	ARDING	NSW																					
SE-51164503	Support	ARMIDALE	NSW																					
SE-53426708	Comment	ARMIDALE	NSW																					
SE-51514210	Support	ARMIDALE	NSW																					
SE-53454210	Object	ARMIDALE	NSW																					
SE-53087707	Support	ARMIDALE	NSW																					
SE-53816457	Comment	ARMIDALE	NSW																					
SE-53729804	Object	ARMIDALE	NSW																					
SE-53814477	Support	ARMIDALE	NSW																					
SE-54201209	Support	ARMIDALE	NSW																					
SE-53444967	Object	ARMIDALE	NSW																					
SE-53446219	Object	ARMIDALE	NSW																					
SE-53710208	Object	ARMIDALE	NSW																					
SE-53746468	Object	ARMIDALE	NSW																					
SE-53772969	Object	ARMIDALE	NSW																					
SE-53781959	Object	ARMIDALE	NSW																					
SE-53729223	Object	BENDEMEER	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53809718	Object	BENDEMEER	NSW																					
SE-53806729	Object	BENDEMEER	NSW																					
SE-53178457	Object	BENDEMEER	NSW																					
SE-53816473	Object	BENDEMEER	NSW																					
SE-52742511	Support	BOOROLONG	NSW																					
SE-52751978	Support	BOOROLONG	NSW																					
SE-53393472	Object	BOOROLONG	NSW																					
SE-52236707	Support	BRODIES PLAINS	NSW																					
SE-53459791	Object	CASTLE DOYLE	NSW																					
SE-53713993	Object	CASTLE DOYLE	NSW																					
SE-53474708	Object	COOLUM BEACH	QLD																					
SE-53728966	Object	DUMARESQ	NSW																					
SE-53818712	Object	DUMARESQ	NSW																					
SE-53729957	Object	DUMARESQ	NSW																					
SE-53819227	Object	DUMARESQ	NSW																					
SE-53745207	Object	DUMARESQ	NSW																					
SE-53816482	Object	DUMERESQ	NSW																					
SE-53323707	Object	EBOR	NSW																					
SE-53587461	Object	GLENCOE	NSW																					
SE-53613978	Object	GLENCOE	NSW																					
SE-53732060	Object	GLENCOE	NSW																					
SE-51749457	Support	GOSTWYCK	NSW																					
SE-53731708	Support	GOSTWYCK	NSW																					
SE-52515714	Support	GOSTWYCK	NSW																					
SE-52861458	Support	GOSTWYCK	NSW																					
SE-53318474	Support	GOSTWYCK	NSW																					
SE-53737301	Object	GUYRA	NSW																					
SE-53629961	Object	GUYRA	NSW																					
SE-53737320	Object	GUYRA	NSW																					
SE-54208743	Support	COFFS HARBOUR	NSW																					
SE-51170976	Support	HANGING ROCK	NSW																					
SE-53639715	Object	HANGING ROCK	NSW																					
SE-53723709	Object	HANGING ROCK	NSW																					
SE-53723712	Object	HANGING ROCK	NSW																					
SE-53732079	Object	HANGING ROCK	NSW																					
SE-52528457	Support	HILLVILLE	NSW																					
SE-53738738	Support	HILLVUE	NSW																					

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SE-53738974	Support	HILLVUE	NSW																					
SE-53222458	Object	KELLYS PLAINS	NSW																					
SE-53727961	Object	KELLYS PLAINS	NSW																					
SE-53515709	Object	KENTUCKY	NSW																					
SE-51765457	Object	KENTUCKY	NSW																					
SE-53524957	Object	KENTUCKY SOUTH	NSW																					
SE-53554210	Object	KUNDABUNG	NSW																					
SE-53212967	Object	MOONBI	NSW																					
SE-53450995	Support	MOORE CREEK	NSW																					
SE-53220467	Support	NIANGALA	NSW																					
SE-53563475	Object	NIANGALA	NSW																					
SE-53718725	Object	NIANGALA	NSW																					
SE-53779457	Object	NIANGALA	NSW																					
SE-53790458	Object	NIANGALA	NSW																					
SE-53818472	Object	NIANGALA	NSW																					
SE-51003754	Object	NIANGALA	NSW																					
SE-53816479	Object	NIANGALA	NSW																					
SE-53538958	Support	NORTH TAMWORTH	NSW																					
SE-54199466	Support	NORTH TAMWORTH	NSW																					
SE-54200969	Support	NORTH TAMWORTH	NSW																					
SE-54204712	Support	NORTH TAMWORTH	NSW																					
SE-54205707	Support	NORTH TAMWORTH	NSW																					
SE-51972007	Object	NOWENDOC	NSW																					
SE-52269208	Object	NOWENDOC	NSW																					
SE-51423251	Support	NOWENDOC	NSW																					
SE-53765206	Object	NUNDLE	NSW																					
SE-53731966	Object	NUNDLE	NSW																					
SE-53732220	Object	NUNDLE	NSW																					
SE-53737220	Support	SALISBURY PLAINS	NSW																					
SE-53451022	Object	SALISBURY PLAINS	NSW																					
SE-53472710	Support	SALISBURY PLAINS	NSW																					
SE-53740979	Object	SALISBURY PLAINS	NSW																					
SE-53787207	Object	SALISBURY PLAINS	NSW																					
SE-53814542	Object	SALISBURY PLAINS	NSW																					
SE-53729722	Object	SALISBURY PLAINS	NSW																					
SE-51334488	Object	SAUMAREZ PONDS	NSW																					
SE-51080960	Object	THALGARRAH	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53818477	Object	URALLA	NSW																					
SE-51017209	Support	URALLA	NSW																					
SE-51018476	Support	URALLA	NSW																					
SE-51021725	Support	URALLA	NSW																					
SE-53714814	Object	URALLA	NSW																					
SE-53814475	Object	URALLA	NSW																					
SE-54208723	Object	URALLA	NSW																					
SE-53407717	Support	URALLA	NSW																					
SE-53656709	Object	URALLA	NSW																					
SE-53513459	Support	WALCHA	NSW																					
SE-53811959	Object	WALCHA	NSW																					
SE-53318472	Support	WALCHA	NSW																					
SE-53745735	Support	WALCHA	NSW																					
SE-51219207	Support	WALCHA	NSW																					
SE-52968716	Object	WALCHA	NSW																					
SE-52969965	Object	WALCHA	NSW																					
SE-52993969	Object	WALCHA	NSW																					
SE-53809710	Support	WALCHA	NSW																					
SE-53811462	Support	WALCHA	NSW																					
SE-54198459	Object	WALCHA	NSW																					
SE-53709745	Object	WALCHA	NSW																					
SE-53736707	Object	WALCHA	NSW																					
SE-52449960	Object	WALCHA	NSW																					
SE-53774212	Object	WALCHA	NSW																					
SE-51385279	Support	WALCHA	NSW																					
SE-51005458	Support	WALCHA	NSW																					
SE-52252271	Support	WALCHA	NSW																					
SE-52973724	Support	WALCHA	NSW																					
SE-53168215	Support	WALCHA	NSW																					
SE-53210970	Support	WALCHA	NSW																					
SE-53714806	Support	WALCHA	NSW																					
SE-53723490	Support	WALCHA	NSW																					
SE-53724962	Support	WALCHA	NSW																					
SE-53731959	Support	WALCHA	NSW																					
SE-53731997	Support	WALCHA	NSW																					
SE-53809958	Support	WALCHA	NSW																					
SE-53820978	Support	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53408212	Object	WALCHA	NSW																					
SE-54208713	Object	WALCHA	NSW																					
SE-53090458	Object	WALCHA	NSW																					
SE-51153207	Object	WALCHA	NSW																					
SE-53714839	Object	WALCHA	NSW																					
SE-53139962	Object	WALCHA	NSW																					
SE-53742015	Object	WALCHA	NSW																					
SE-53118721	Support	WALCHA	NSW																					
SE-53753214	Support	WALCHA	NSW																					
SE-54201225	Support	WALCHA	NSW																					
SE-54208717	Support	WALCHA	NSW																					
SE-54210459	Support	WALCHA	NSW																					
SE-54250458	Support	WALCHA	NSW																					
SE-53729858	Object	WALCHA	NSW																					
SE-52356961	Support	WALCHA	NSW																					
SE-53813481	Support	WALCHA	NSW																					
SE-51206225	Object	WALCHA	NSW																					
SE-53276207	Object	WALCHA	NSW																					
SE-53617994	Object	WALCHA	NSW																					
SE-53277957	Comment	WALCHA	NSW																					
SE-54206457	Support	WALCHA	NSW																					
SE-53276210	Object	WALCHA	NSW																					
SE-53772988	Object	WALCHA	NSW																					
SE-53774731	Object	WALCHA	NSW																					
SE-51701738	Object	WALCHA	NSW																					
SE-53598488	Object	WALCHA	NSW																					
SE-53723714	Object	WALCHA	NSW																					
SE-54206730	Support	WALCHA	NSW																					
SE-53624208	Support	WALCHA	NSW																					
SE-54202709	Object	WALCHA	NSW																					
SE-53459217	Object	WALCHA	NSW																					
SE-53481227	Object	WALCHA	NSW																					
SE-53712957	Object	WALCHA	NSW																					
SE-53724471	Object	WALCHA	NSW																					
SE-53728238	Support	WALCHA	NSW																					
SE-51023747	Object	WALCHA	NSW																					
SE-51071743	Support	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-51084736	Support	WALCHA	NSW																					
SE-51179966	Object	WALCHA	NSW																					
SE-51433209	Support	WALCHA	NSW																					
SE-51495966	Support	WALCHA	NSW																					
SE-51517459	Object	WALCHA	NSW																					
SE-54210461	Object	ARMIDALE	NSW																					
SE-51573207	Support	WALCHA	NSW																					
SE-52132710	Object	WALCHA	NSW																					
SE-52132977	Support	WALCHA	NSW																					
SE-52133230	Object	WALCHA	NSW																					
SE-52149996	Object	WALCHA	NSW																					
SE-52192461	Object	WALCHA	NSW																					
SE-52198207	Object	WALCHA	NSW																					
SE-52449957	Object	WALCHA	NSW																					
SE-53499965	Object	WALCHA	NSW																					
SE-53518484	Object	WALCHA	NSW																					
SE-53741487	Comment	WALCHA	NSW																					
SE-54199459	Object	WALCHA	NSW																					
SE-54210471	Object	WALCHA	NSW																					
SE-53681484	Object	WALCHA	NSW																					
SE-53681489	Object	WALCHA	NSW																					
SE-53615211	Object	WALCHA	NSW																					
SE-53618209	Object	WALCHA	NSW																					
SE-53471707	Object	WALCHA	NSW																					
SE-53595208	Object	WALCHA	NSW																					
SE-53618535	Object	WALCHA	NSW																					
SE-53618541	Object	WALCHA	NSW																					
SE-51052979	Object	WALCHA	NSW																					
SE-51696970	Object	WALCHA	NSW																					
SE-53551457	Object	WALCHA	NSW																					
SE-54236460	Object	WALCHA	NSW																					
SE-53728971	Support	WALCHA	NSW																					
SE-51402459	Comment	WALCHA	NSW																					
SE-51377725	Object	WALCHA	NSW																					
SE-51426457	Object	WALCHA	NSW																					
SE-53002957	Object	WALCHA	NSW																					
SE-53174707	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53385460	Object	WALCHA	NSW																					
SE-53475981	Object	WALCHA	NSW																					
SE-53601458	Object	WALCHA	NSW																					
SE-53688462	Object	WALCHA	NSW																					
SE-53379466	Object	WALCHA	NSW																					
SE-53379967	Object	WALCHA	NSW																					
SE-53379986	Object	WALCHA	NSW																					
SE-53381208	Object	WALCHA	NSW																					
SE-54210457	Object	WALCHA	NSW																					
SE-54200958	Object	WALCHA	NSW																					
SE-53808217	Object	WALCHA	NSW																					
SE-53814458	Object	WALCHA	NSW																					
SE-53811457	Object	WALCHA	NSW																					
SE-53820729	Object	WALCHA	NSW																					
SE-51830957	Object	WALCHA	NSW																					
SE-51852708	Object	WALCHA	NSW																					
SE-53739720	Object	WALCHA	NSW																					
SE-53740009	Object	WALCHA	NSW																					
SE-53737297	Object	WALCHA	NSW																					
SE-53598712	Object	WALCHA	NSW																					
SE-54246958	Object	WALCHA	NSW																					
SE-54254463	Object	WALCHA	NSW																					
SE-52993967	Object	WALCHA	NSW																					
SE-51738487	Support	WALCHA	NSW																					
SE-52759207	Support	WALCHA	NSW																					
SE-52759210	Support	WALCHA	NSW																					
SE-51886738	Object	WALCHA	NSW																					
SE-54208737	Object	WALCHA	NSW																					
SE-54210465	Object	WALCHA	Regional																					
SE-54208735	Object	WALCHA	NSW																					
SE-53646212	Object	WALCHA	NSW																					
SE-53728217	Object	WALCHA	NSW																					
SE-52968712	Object	WALCHA	NSW																					
SE-52968958	Object	WALCHA	NSW																					
SE-54216721	Object	WALCHA	NSW																					
SE-54202711	Object	WALCHA	NSW																					
SE-53714725	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53675474	Object	WALCHA	NSW																					
SE-53687958	Object	WALCHA	NSW																					
SE-54244708	Object	WALCHA	NSW																					
SE-53192243	Object	WALCHA	NSW																					
SE-53355228	Object	WALCHA	NSW																					
SE-53356473	Object	WALCHA	NSW																					
SE-53356476	Object	WALCHA	NSW																					
SE-53361707	Object	WALCHA	NSW																					
SE-53362961	Object	WALCHA	NSW																					
SE-53454223	Object	WALCHA	NSW																					
SE-53459230	Object	WALCHA	NSW																					
SE-51588994	Support	WALCHA	NSW																					
SE-53580741	Object	WALCHA	NSW																					
SE-53225961	Support	WALCHA	NSW																					
SE-53563211	Object	WALCHA	NSW																					
SE-52362709	Support	WALCHA	NSW																					
SE-53316712	Object	WALCHA	NSW																					
SE-52993961	Object	WALCHA	NSW																					
SE-52995215	Object	WALCHA	NSW																					
SE-51281734	Support	WALCHA	NSW																					
SE-51283733	Support	WALCHA	NSW																					
SE-54216716	Object	WALCHA	NSW																					
SE-53849471	Support	WALCHA	NSW																					
SE-54208721	Object	WALCHA	NSW																					
SE-54206726	Object	WALCHA	NSW																					
SE-54208715	Object	WALCHA	NSW																					
SE-51208291	Object	WALCHA	NSW																					
SE-54208719	Support	WALCHA	NSW																					
SE-53714800	Object	WALCHA	NSW																					
SE-54201220	Support	WALCHA	NSW																					
SE-54206728	Support	WALCHA	NSW																					
SE-53356213	Object	WALCHA	NSW																					
SE-53573459	Object	WALCHA	NSW																					
SE-53597222	Object	WALCHA	NSW																					
SE-53726475	Object	WALCHA	NSW																					
SE-53767706	Object	WALCHA	NSW																					
SE-53820457	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53729768	Support	WALCHA	NSW																					
SE-53210713	Object	WALCHA	NSW																					
SE-53220469	Object	WALCHA	NSW																					
SE-51591731	Support	WALCHA	NSW																					
SE-53278476	Object	WALCHA	NSW																					
SE-53454242	Object	WALCHA	NSW																					
SE-53731971	Object	WALCHA	NSW																					
SE-54195466	Object	WALCHA	NSW																					
SE-54206722	Object	WALCHA	NSW																					
SE-54210469	Object	WALCHA	NSW																					
SE-54246707	Object	WALCHA	NSW																					
SE-53803461	Object	WALCHA	NSW																					
SE-53565458	Support	WALCHA	NSW																					
SE-53472778	Object	WALCHA	NSW																					
SE-53777957	Object	WALCHA	NSW																					
SE-53819225	Object	WALCHA	NSW																					
SE-53814238	Object	WALCHA	NSW																					
SE-53192213	Object	WALCHA	NSW																					
SE-53820957	Object	WALCHA	NSW																					
SE-51251707	Object	WALCHA	NSW																					
SE-51591477	Support	WALCHA	NSW																					
SE-52967212	Object	WALCHA	NSW																					
SE-53434957	Object	WALCHA	NSW																					
SE-53731712	Object	WALCHA	NSW																					
SE-53737478	Object	WALCHA	NSW																					
SE-54236458	Object	WALCHA	NSW																					
SE-53638458	Object	WALCHA	NSW																					
SE-54254465	Support	WALCHA	NSW																					
SE-54191707	Object	WALCHA	NSW																					
SE-53539458	Object	WALCHA	NSW																					
SE-52993972	Object	WALCHA	NSW																					
SE-54201234	Support	WALCHA	NSW																					
SE-52968714	Object	WALCHA	NSW																					
SE-53403960	Object	WALCHA	NSW																					
SE-53408207	Object	WALCHA	NSW																					
SE-53441464	Object	WALCHA	NSW																					
SE-53316492	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53316727	Object	WALCHA	NSW																					
SE-51534710	Support	WALCHA	NSW																					
SE-53318968	Support	WALCHA	NSW																					
SE-53387016	Support	WALCHA	NSW																					
SE-53797228	Support	WALCHA	NSW																					
SE-53820462	Object	WALCHA	NSW																					
SE-53410484	Object	WALCHA	NSW																					
SE-53737250	Object	WALCHA	NSW																					
SE-53659207	Object	WALCHA	NSW																					
SE-54206713	Object	WALCHA	NSW																					
SE-51452504	Support	WALCHA	NSW																					
SE-53719458	Object	WALCHA	NSW																					
SE-53819208	Support	WALCHA	NSW																					
SE-53407239	Object	WALCHA	NSW																					
SE-53659222	Object	WALCHA	NSW																					
SE-53788459	Support	WALCHA	NSW																					
SE-51244458	Object	WALCHA	NSW																					
SE-53459266	Object	WALCHA	NSW																					
SE-53459785	Object	WALCHA	NSW																					
SE-53459789	Object	WALCHA	NSW																					
SE-53471487	Object	WALCHA	NSW																					
SE-54208729	Object	WALCHA	NSW																					
SE-54208741	Object	WALCHA	NSW																					
SE-53747228	Object	WALCHA	NSW																					
SE-53433711	Support	WALCHA	NSW																					
SE-53542707	Object	WALCHA	NSW																					
SE-53542711	Object	WALCHA	NSW																					
SE-53459486	Object	WALCHA	NSW																					
SE-52969957	Object	WALCHA	NSW																					
SE-52995222	Object	WALCHA	NSW																					
SE-53427476	Object	WALCHA	NSW																					
SE-54208957	Object	WALCHA	NSW																					
SE-53418967	Object	WALCHA	NSW																					
SE-53637989	Object	WALCHA	NSW																					
SE-53743977	Object	WALCHA	NSW																					
SE-54207460	Object	WALCHA	NSW																					
SE-52969960	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-51452754	Object	WALCHA	NSW																					
SE-53729893	Object	WALCHA	NSW																					
SE-53386994	Object	WALCHA	NSW																					
SE-53719709	Object	WALCHA	NSW																					
SE-53720458	Object	WALCHA	NSW																					
SE-53727222	Object	WALCHA	NSW																					
SE-51874485	Object	WALCHA	NSW																					
SE-54206738	Object	WALCHA	NSW																					
SE-52996715	Object	WALCHA	NSW																					
SE-54207458	Object	WALCHA	NSW																					
SE-53720460	Object	WALCHA	NSW																					
SE-54208725	Object	WALCHA	NSW																					
SE-54208727	Object	WALCHA	NSW																					
SE-53797226	Support	WALCHA	NSW																					
SE-53561479	Support	WALCHA	NSW																					
SE-53741485	Support	WALCHA	NSW																					
SE-52967708	Object	WALCHA	NSW																					
SE-54201213	Object	WALCHA	NSW																					
SE-54207211	Object	WALCHA	NSW																					
SE-54200461	Object	WALCHA	NSW																					
SE-52582708	Support	WALCHA	NSW																					
SE-52798752	Object	WALCHA	NSW																					
SE-52859212	Object	WALCHA	NSW																					
SE-53163723	Support	WALCHA	NSW																					
SE-53174717	Support	WALCHA	NSW																					
SE-53246960	Support	WALCHA	NSW																					
SE-53316483	Support	WALCHA	NSW																					
SE-53338460	Support	WALCHA	NSW																					
SE-53356235	Support	WALCHA	NSW																					
SE-53395221	Object	WALCHA	NSW																					
SE-53401208	Comment	WALCHA	NSW																					
SE-53426459	Object	WALCHA	NSW																					
SE-53428958	Object	WALCHA	NSW																					
SE-53430481	Object	WALCHA	NSW																					
SE-53439457	Object	WALCHA	NSW																					
SE-53447962	Object	WALCHA	NSW																					
SE-53447978	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53454247	Object	WALCHA	NSW																					
SE-53461221	Object	WALCHA	NSW																					
SE-53464973	Support	WALCHA	NSW																					
SE-53472758	Object	WALCHA	NSW																					
SE-53472775	Object	WALCHA	NSW																					
SE-53473505	Object	WALCHA	NSW																					
SE-53499990	Object	WALCHA	NSW																					
SE-53515963	Object	WALCHA	NSW																					
SE-53532715	Object	WALCHA	NSW																					
SE-53533470	Support	WALCHA (NSW)	NSW																					
SE-53535964	Support	WALCHA	NSW																					
SE-53535968	Support	WALCHA	NSW																					
SE-53535976	Support	WALCHA	NSW																					
SE-53537708	Support	WALCHA	NSW																					
SE-53816230	Object	WALCHA	NSW																					
SE-53459227	Object	WALCHA	NSW																					
SE-53461963	Object	WALCHA	NSW																					
SE-53736712	Object	WALCHA	NSW																					
SE-53737269	Object	WALCHA	NSW																					
SE-53818710	Object	WALCHA	NSW																					
SE-53002963	Object	WALCHA	NSW																					
SE-53714849	Object	WALCHA	NSW																					
SE-53744957	Object	WALCHA	NSW																					
SE-54200463	Support	WALCHA	NSW																					
SE-53809707	Object	WALCHA	NSW																					
SE-54201230	Object	WALCHA	NSW																					
SE-54208731	Object	WALCHA	NSW																					
SE-53678961	Object	WALCHA	NSW																					
SE-53681491	Object	WALCHA	NSW																					
SE-53681743	Object	WALCHA	NSW																					
SE-53747958	Object	WALCHA	NSW																					
SE-53817744	Object	WALCHA	NSW																					
SE-53645708	Object	WALCHA	NSW																					
SE-53681494	Object	WALCHA	NSW																					
SE-53448227	Object	WALCHA	NSW																					
SE-51427708	Object	WALCHA	NSW																					
SE-51498207	Support	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53727959	Object	WALCHA	NSW																					
SE-53741481	Object	WALCHA	NSW																					
SE-53583974	Support	WALCHA	NSW																					
SE-53538963	Support	WALCHA	NSW																					
SE-53549712	Object	WALCHA	NSW																					
SE-53553539	Support	WALCHA	NSW																					
SE-53553541	Support	WALCHA	NSW																					
SE-53561470	Object	WALCHA	NSW																					
SE-53566466	Object	WALCHA	NSW																					
SE-53615229	Object	WALCHA	NSW																					
SE-53617712	Support	WALCHA	NSW																					
SE-53627207	Object	WALCHA	NSW																					
SE-53627470	Object	WALCHA	NSW																					
SE-53636223	Object	WALCHA	NSW																					
SE-53637970	Object	WALCHA ROAD	NSW																					
SE-53639484	Object	WALCHA	NSW																					
SE-53642459	Object	WALCHA	NSW																					
SE-53643711	Object	WALCHA	NSW																					
SE-53645760	Object	WALCHA	NSW																					
SE-53662729	Object	WALCHA	NSW																					
SE-53665472	Object	WALCHA	NSW																					
SE-53666707	Support	WALCHA	NSW																					
SE-53678495	Object	WALCHA	NSW																					
SE-53681957	Object	WALCHA	NSW																					
SE-53685457	Support	WALCHA	NSW																					
SE-53687467	Object	WALCHA	NSW																					
SE-53694220	Object	WALCHA	NSW																					
SE-53712744	Support	WALCHA	NSW																					
SE-53712761	Object	WALCHA	NSW																					
SE-53714211	Object	WALCHA	NSW																					
SE-53714227	Object	WALCHA	NSW																					
SE-53714754	Object	WALCHA	NSW																					
SE-53714818	Object	WALCHA	NSW																					
SE-53714822	Object	WALCHA	NSW																					
SE-53716711	Support	WALCHA	NSW																					
SE-53718722	Support	WALCHA	NSW																					
SE-53718733	Support	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-53728207	Support	WALCHA	NSW																					
SE-53729746	Object	WALCHA	NSW																					
SE-53737271	Object	WALCHA	NSW																					
SE-53738741	Object	WALCHA	NSW																					
SE-53740031	Support	WALCHA	NSW																					
SE-53741976	Support	WALCHA	NSW																					
SE-53741979	Support	WALCHA	NSW																					
SE-53742225	Support	WALCHA	NSW																					
SE-53742262	Object	WALCHA	NSW																					
SE-53743957	Object	WALCHA	NSW																					
SE-53745228	Object	WALCHA	NSW																					
SE-53747208	Object	WALCHA	NSW																					
SE-53754718	Object	WALCHA	NSW																					
SE-53778738	Support	WALCHA	NSW																					
SE-53783207	Object	WALCHA	NSW																					
SE-53785957	Support	WALCHA	NSW																					
SE-53788463	Support	WALCHA	NSW																					
SE-53795736	Object	WALCHA	NSW																					
SE-53805707	Object	WALCHA	NSW																					
SE-53806733	Support	WALCHA	NSW																					
SE-53807210	Object	WALCHA	NSW																					
SE-53808212	Support	WALCHA	NSW																					
SE-53808234	Support	WALCHA	NSW																					
SE-53809713	Object	WALCHA	NSW																					
SE-53810708	Object	WALCHA	NSW																					
SE-53811460	Support	WALCHA	NSW																					
SE-53811494	Support	WALCHA	NSW																					
SE-53811708	Support	WALCHA	NSW																					
SE-53813483	Object	WALCHA	NSW																					
SE-53816226	Support	WALCHA	NSW																					
SE-53818475	Object	WALCHA	NSW																					
SE-53818479	Object	WALCHA	NSW																					
SE-53818708	Support	WALCHA	NSW																					
SE-53820710	Object	WALCHA	NSW																					
SE-53821987	Object	WALCHA	NSW																					
SE-53822005	Object	WALCHA	NSW																					
SE-53847007	Object	WALCHA	NSW																					

Submission ID	Position	Suburb	State	The Project	Procedural matters	Justification and Evaluation	Unscoped / N/A	Biodiversity	Noise and Vibration	Visual	Transport	Social and Economic	Aviation	Telecommunications	Bushfire	BESS Hazards	Human health / Blade Throw	Heritage	Agriculture	Soil and Water	Flooding	Air Quality	Waste	Cumulative Impacts
SE-54191209	Support	WALCHA	NSW																					
SE-54195457	Support	WALCHA	NSW																					
SE-54198457	Support	WALCHA	NSW																					
SE-54199207	Support	WALCHA	NSW																					
SE-54199209	Support	WALCHA	NSW																					
SE-54199214	Support	WALCHA	NSW																					
SE-54200459	Support	WALCHA	NSW																					
SE-54200465	Object	WALCHA	NSW																					
SE-54200963	Support	WALCHA	NSW																					
SE-54201207	Support	WALCHA	NSW																					
SE-54201211	Support	WALCHA	NSW																					
SE-54201215	Support	WALCHA	NSW																					
SE-54201222	Object	WALCHA	NSW																					
SE-54201227	Support	WALCHA	NSW																					
SE-54201232	Object	WALCHA	NSW																					
SE-54202714	Support	WALCHA	NSW																					
SE-54202718	Support	WALCHA	NSW																					
SE-54204708	Support	WALCHA	NSW																					
SE-54204968	Support	WALCHA	NSW																					
SE-54206711	Support	WALCHA	NSW																					
SE-54244712	Support	WALCHA	NSW																					
SE-54244719 (Sheila Faulkner)	Object	WALCHA	NSW																					
SE-54244723	Support	WALCHA	NSW																					
SE-53459727	Object	WALCHA	NSW																					
SE-53528957	Object	WALCHA	NSW																					
SE-53602215	Object	WALCHA	NSW																					
SE-53735460	Object	WALCHA	NSW																					
SE-51451713	Support	WALCHA (NSW)	NSW																					
SE-54246963	Support	WALCHA	NSW																					
SE-53817707	Object	WALCHA (NSW)	NSW																					
SE-53518482	Object	WALCHA ROAD	NSW																					
SE-54250461 (VICtoria Heffernan)	Object	WALCHA	NSW																					
SE-52353961	Support	WEST TAMWORTH	NSW																					
SE-54210463	Support	WOLLUN	NSW																					
SE-52968718	Object	WOLLUN	NSW																					
SE-53600464	Object	WOLLUN	NSW																					
SE-53814528	Object	WOLLUN	NSW																					

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APPENDIX B NOISE RESPONSE TO SUBMISSIONS

Winterbourne Wind Farm

Response to Submissions

S6207C16

sonus.

Chris Turnbull
Principal
Phone: +61 (0) 417 845 720
Email: ct@sonus.com.au
www.sonus.com.au

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Response to Submissions

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Prepared By : Chris Turnbull, MAAS

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Introduction

A Noise Impact Assessment (**Assessment**) has been made for construction and operation of the Winterbourne Wind Farm (**the Project**).

The Assessment was conducted in accordance with the noise and vibration related sections of the Planning Secretary's Environmental Assessment Requirements (**SEARs**) for the Project, including the following assessment framework:

- Wind turbine noise in accordance with the *NSW Wind Energy: Noise Assessment Bulletin* (NSW EPA/DPE, 2016), which in turn references the South Australian *Wind Farm Environmental Noise Guidelines* 2009 (**SA 2009**);
- Noise generated by ancillary infrastructure in accordance with the *NSW Noise Policy for Industry* (EPA, 2017);
- Construction noise under the Interim Construction Noise Guideline (DECC, 2009);
- Traffic noise under the NSW Road Noise Policy (DECCW, 2011); and,
- Vibration under the *Assessing Vibration: A Technical Guideline* (DECC, 2006).
- Potential noise impacts on amenity / recreational use of the Oxley Wild Rivers National Park (including walking tracks, campgrounds and lookouts) considering the *NSW Noise Policy for Industry* (EPA, 2017).

The Assessment is detailed in Sonus Report S6207C14 (**the Sonus Report**) attached to the Environmental Impact Statement (**EIS**).

As part of the exhibition stage of the EIS for the Project, submissions have been received. With respect to noise, these include a submission from "Voice for Walcha", which included a "peer review" of the Sonus Report prepared by Les Huson & Associates (**the Huson Review**). Advice has also been received from the Environment Protection Authority (**EPA**) and Department of Biodiversity and Conservation.

The key points raised by the Huson Review, the EPA advice and the Department of Biodiversity and Conservation advice are summarised as follows:

Voice for Walcha Submission

General:

- Infrasound
- Selection of WTG model
- The relevant version of the South Australian *Wind Farm Environmental Noise Guidelines*
- Agreements with landholders
- Reference to the *Uren v Bald Hills Wind Farm Pty Ltd* [2022] VSC 145.

Background Noise Measurements:

- Meteorological mast location
- Local wind measurements
- Representative background noise data
- Sound level meter specification
- Wind speed range.

Noise Model:

- Modelling inputs and methodology
- Tonality assessment.

EPA Submission

Road Traffic Noise Assessment:

- Modelling algorithm used to predict traffic noise levels
- Predicted exceedance of Road Noise Policy assessment criteria.

Department of Biodiversity and Conservation Submission

Impacts on Oxley Wild Rivers National Park:

- Consideration of noise impacts at remote locations within the National Park
- Removal of wind turbine generators (WTGs) that are audible within the National Park.

Discussion regarding each of the above items is provided in the following sections.

Infrasound

Infrasound is generally considered to be sound at frequencies less than 20 Hz and is often described as being inaudible. However, sound below 20 Hz can be audible provided that the sound level is sufficiently high. The G-weighting scale has been standardised to determine the human perception and annoyance due to noise that lies within the infrasound frequency range. A common audibility threshold from the range of studies is an infrasound level of 85 dB(G) or greater.

Early wind turbines were constructed with blades located downwind of the tower. These turbines produced significant levels of infrasound as a result of the wake caused by the tower. Modern wind turbines (such as those proposed to be constructed as part of the Project) are constructed with blades upwind of the tower, resulting in infrasound levels well below the level of perception at residential setback distances.

Sonus has conducted studies into the level of infrasound produced by wind turbines. These studies confirm that the level of infrasound from wind turbines is no greater than the noise encountered from other natural and non-natural noise sources such as waves breaking. The results of these studies were presented at the fourth International Conference, Wind Turbine Noise, 2011 in Rome¹ and appeared as a peer reviewed paper in "Acoustics Australia", the journal of the Australian Acoustical Society².

A 2013 study by the South Australian Environment Protection Authority (EPA) into infrasound³ provided findings which were consistent with the above studies conducted by Sonus, including:

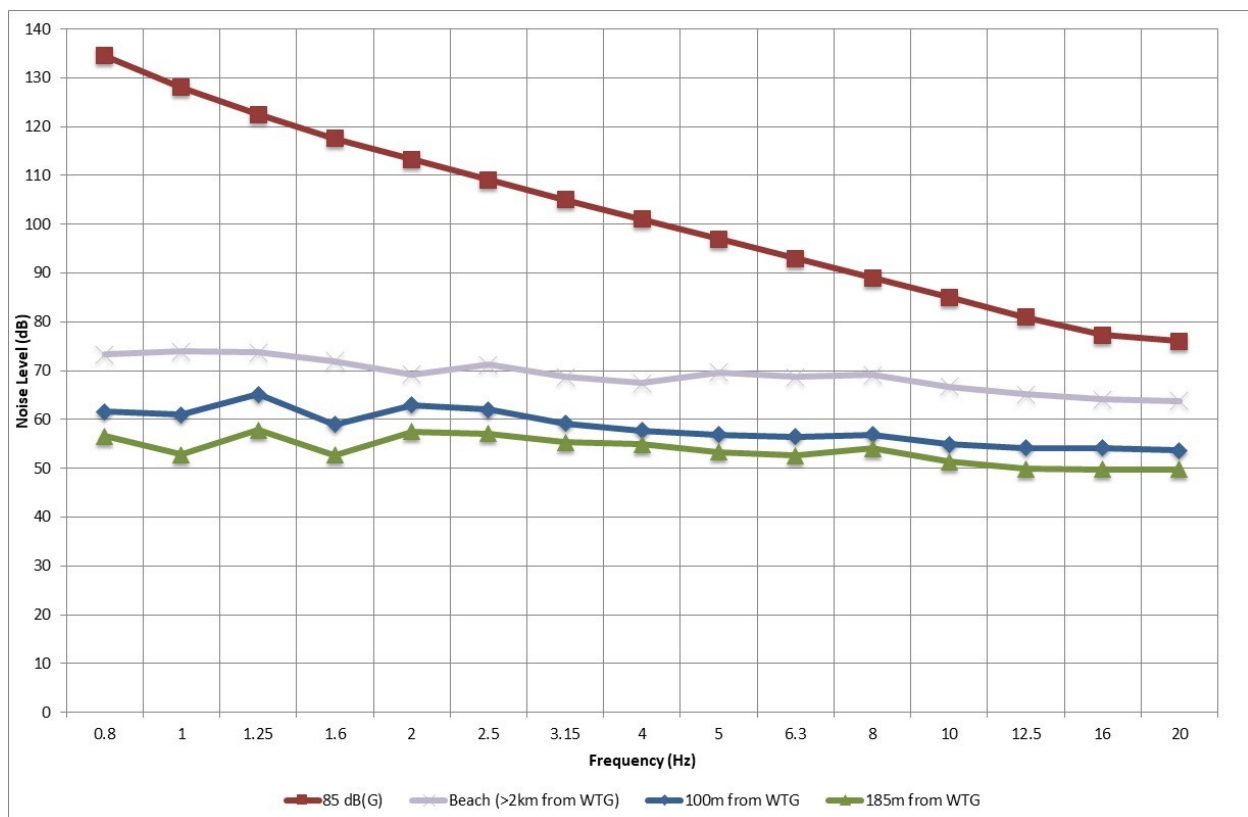
- the measured levels of infrasound from wind farms are well below the threshold of perception;
- the measured infrasound levels around wind farms are no higher than levels measured at other locations where people live, work and sleep; and,
- the characteristics of noise produced by wind farms are not unique and are common in everyday life.

¹ Turnbull, C & Turner, J 2011, 'Measurement of Infrasound from Wind Farms and Other Sources', *Fourth International Conference on Wind Turbine Noise*, Rome, 11-14 April 2011.

² Turnbull, C, Turner, J & Walsh, D 2012, 'Measurement and level of infrasound from wind farms and other sources', *Acoustics Australia*, vol 40, no. 1, pp. 45-50.

³ Evans, T, Cooper J & Lenchine V, 2013 'Infrasound levels near windfarms and in other environments', Environment Protection Authority (SA), viewed 22 June 2022, <https://www.epa.sa.gov.au/files/477912_infrasound.pdf>.

Sonus recently measured infrasound in the vicinity of another wind farm and on a nearby beach. Infrasound was measured at 100m and 185m downwind of a contemporary wind turbine generator (**WTG**). At the time, there was a hub height wind speed of approximately 6m/s. Infrasound was also measured on a nearby beach. The beach was more than 2 kilometres from the nearest WTG. The measured infrasound levels are shown on the graph below, along with the 85 dB(G) threshold of perception.



The above figure indicates that infrasound from the WTG reduced with distance, indicating that infrasound from the WTG was measurable albeit at levels many orders of magnitude below the 85dB(G) audibility threshold. The above also indicates that infrasound from the WTG was lower than the level of infrasound measured at beach, which was also well below the threshold of perception.

The above outcomes would be expected to be applicable to any contemporary make and model of WTG (including those to be installed as part of the Project).

Selection of WTG Model

The Huson Review provides the opinion that a noise assessment made as part of the EIS must be based on the final turbine selection and turbine placement. On the contrary, it is common practice for a representative selection to be used during the EIS stage, with a final noise assessment made during the detailed design phase following any approval. The use of a representative turbine is specifically contemplated by the NSW Wind Energy: Noise Assessment Bulletin (the **Bulletin**), which requires that the noise assessment during the EIS stage include the “*make and model of the representative wind turbine(s)*”.

Relevant version of SA Guidelines

The Bulletin references the 2009 version of the South Australian *Wind Farms – environmental noise guidelines* (**SA 2009**) and therefore this was the version used to prepare the Sonus Report. However, an update to SA 2009 was prepared by the South Australian EPA in 2021 (**SA 2021**), which included some changes to the methodology. In particular, SA 2021 includes a change in the methodology for analysing background noise levels, as well as the addition of accepted noise model input parameters for predicting wind turbine noise.

Notwithstanding the reference to SA 2009 in the Bulletin, a supplementary assessment has been performed to determine the potential for SA 2021 to change the outcome and conclusions of the Sonus Report.

SA 2009 requires a regression analysis of correlated background noise and wind speed measurements to find a line of best fit, which determines the reported background noise levels. In contrast, SA 2021 requires the correlated noise and wind speed measurements to be analysed by separating the data points into ‘wind speed bins’. Wind speed bins are a collection of data points within +/- 0.5 m/s of the integer wind speeds, with each wind speed bin analysed (averaged) individually. The table below shows the criteria resultant from both methods, noting that there are not significant differences between the two methods.

Location	Guideline Version	Hub Height Integer Wind Speeds, 149m AGL (dB(A))									
		3 m/s	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s	9 m/s	10 m/s	11 m/s	12 m/s
SR005	SA 2009	44	44	44	44	44	44	44	44	43	43
	SA 2021	44	43	44	44	43	44	44	44	44	43
SR078	SA 2009	35	35	36	37	38	39	39	40	41	41
	SA 2021	35	35	36	37	38	39	40	41	41	42
SR086	SA 2009	37	37	38	38	39	39	39	40	40	39
	SA 2021	37	37	37	38	39	39	39	39	40	40
SR109	SA 2009	35	35	35	35	35	35	36	37	38	39
	SA 2021	35	35	35	35	35	36	37	38	40	41
SR129	SA 2009	35	35	36	36	37	38	39	40	41	41
	SA 2021	35	35	36	36	37	38	40	40	41	41
SR212	SA 2009	35	35	35	35	35	37	38	39	39	39
	SA 2021	35	35	35	35	35	37	38	38	40	41
SR262	SA 2009	35	35	35	35	35	35	36	37	38	39
	SA 2021	35	35	35	35	35	35	36	37	39	39

Both SA 2009 and SA 2021 note that both the ISO9613-2 and the CONCAWE noise models are acceptable and provide default inputs to the model. In addition, SA 2021 also includes the following:

Noise propagation model and parameters as recommended in section 4.3 of the Institute of Acoustics A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (May 2013) may be utilised as an alternative to the above input parameters.

As the Huson Review raises concern regarding the accuracy of the noise modelling in the Sonus Report, supplementary noise modelling has been conducted in accordance with the *Good Practice Guide for the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise* (May 2013) (the **IOA Guide**).

A comparison between the results of the two noise models at the non-involved locations presented in the Sonus Report has been included in the table below. The criteria based on the two methods of analysing background noise monitoring has also been included for comparison.

Location	Noise Model	Hub Height Integer Wind Speeds, 149m AGL (dB(A))								
		4 m/s	5 m/s	6 m/s	7 m/s	8 m/s	9 m/s	10 m/s	11 m/s	12 m/s
Location where SR086 is the representative logging location										
SA 2009 Criteria		37	38	38	39	39	39	40	40	39
SA 2021 Criteria		37	37	38	39	39	39	39	40	40
SR240	CONCAWE	26	26	28	31	34	36	37	37	37
	ISO9613-2	25	25	27	30	33	35	35	35	35
Locations where SR109 is the representative logging location										
SA 2009 Criteria		35	35	35	35	35	36	37	38	39
SA 2021 Criteria		35	35	35	35	36	37	38	40	41
SR004	CONCAWE	22	22	24	27	30	32	32	32	32
	ISO9613-2	21	21	23	26	29	31	31	31	31
SR007	CONCAWE	22	22	24	27	30	32	33	33	33
	ISO9613-2	21	21	23	26	29	31	32	32	32
SR105	CONCAWE	22	22	24	27	30	32	33	33	33
	ISO9613-2	21	21	23	26	29	31	32	32	32
SR107	CONCAWE	21	21	23	26	29	31	31	31	31
	ISO9613-2	20	20	22	25	28	30	30	30	30
SR109	CONCAWE	23	23	25	28	31	33	34	34	34
	ISO9613-2	22	22	24	27	30	32	33	33	33
SR216	CONCAWE	21	21	23	26	29	31	31	31	31
	ISO9613-2	20	20	22	25	28	30	31	31	31
SR300	CONCAWE	20	20	22	25	28	30	31	31	31
	ISO9613-2	20	20	22	25	28	30	31	31	30
Locations where SR129 is the representative logging location										
SA 2009 Criteria		35	36	36	37	38	39	40	41	41
SA 2021 Criteria		35	36	36	37	38	40	40	41	41
SR129	CONCAWE	20	20	22	25	28	30	31	31	31
	ISO9613-2	20	21	23	26	28	31	31	31	31
SR264	CONCAWE	20	20	22	25	28	30	30	30	30
	ISO9613-2	19	19	21	24	27	29	29	29	29
SR268	CONCAWE	22	23	25	28	30	33	33	33	33
	ISO9613-2	21	21	23	26	29	31	32	31	31
SR272	CONCAWE	24	24	26	29	32	34	35	35	34
	ISO9613-2	22	23	25	28	30	33	33	33	33
Location where SR262 is the representative logging location										
SA 2009 Criteria		35	35	35	35	35	36	37	38	39
SA 2021 Criteria		35	35	35	35	35	36	37	39	39
SR262	CONCAWE	22	22	24	27	30	32	33	32	32
	ISO9613-2	21	21	23	26	29	31	31	31	31

The results in the table above indicate that the predicted noise levels, regardless of the noise model used, will achieve the criteria developed in accordance with the methodology of both SA 2009 and SA 2021. It can also be seen that the results from the two different noise models are comparable, only differing by at most 2 dB(A), with the CONCAWE model (used in the Sonus Report) being more conservative in general.

Therefore, the supplementary assessment has confirmed the outcomes and conclusions of the Sonus Report, when assessed in accordance with the changes introduced by SA 2021.

Agreements with Landholders

Commercial agreements have been formed between Vestas and wind farm hosts and other non-associated landowners to address various impacts associated with the Project, specific to their dwellings. The New South Wales Planning and Environment *Wind Energy: Noise Assessment Bulletin (the Bulletin)* allows for less onerous (i.e. higher) criteria to be used for associated landowners. The Sonus Report has been based on the understanding that agreements are in place for these landowners.

Uren v Bald Hills Wind Farm Pty Ltd [2022] VSC 145

The Huson Review includes a reference to the Uren v Bald Hills Wind Farm Supreme Court Decision, implying that the Decision is a basis for criticism of the Sonus noise modelling. The Decision included the following description of the work conducted by Sonus:

As will be clear from the preceding paragraphs, Mr Turnbull was meticulous in his approach to assessing the wind farm's compliance with condition 19 of the permit. He went to some lengths in his report to be transparent about his methodology, and gave clear and considered explanations of it in answer to questions at trial.

The Decision did not agree with some interpretations of a superseded New Zealand Standard (NZS 6808:1998), which were made by Sonus. This Standard has no relevance to a proposed wind farm in New South Wales.

Meteorological Mast Location

Wind was measured at four masts for correlation with background noise monitoring. The Huson Review notes that "Wind speed data from these locations are unsuitable for background measurement purposes since the location will subsequently be affected by operation of the proposed nearby wind turbines. An alternative temporary mast location should have been chosen that will not be subject to influence from any future turbine."

The masts must be located to represent the wind speed at future turbine locations. This will necessarily result in the masts being in locations where turbines are likely to be placed. Therefore, it is common practice for the post construction wind monitoring to be conducted at an alternate location and adjusted to provide equivalent wind speed measurements to the pre-construction wind monitoring without wake effects.

Local Wind Measurements

The windscreens used in the assessment have large diameters to minimise any wind noise on the microphone. This results in substantially lower wind induced noise than standard windscreens. Notwithstanding, SA 2009 (and SA 2021) require that where manufacturer's data relating to the noise from wind is not available, data should be excluded for periods where the local wind speed (at microphone height) is above 5m/s (as distinct from the hub height wind speed, noting that this would usually be higher than the wind speed at microphone height). As full manufacturer's data for the windscreen are not available, data collected in periods where the local wind at microphone height exceeded 5m/s have been excluded from the analysis in accordance with the SA 2009. To do this, the wind speed was measured locally (adjacent to background noise logging) at three locations, with the results applied to the other monitoring locations. The Huson Review raises concern that this method might remove an excessive number of data points. More than 6000 data points were collected at each noise monitoring location and the highest number of points removed as a result of the local wind monitoring was 5. These 5 points have no influence on the overall background noise levels.

Representative Background Noise Data

The Huson Review suggests that the background noise monitoring might not be representative, given the length of the monitoring period. SA 2009 (and SA 2021) requires a minimum of 2000 points to be collected, whereas between approximately 6500 and 9300 data points were collected at residences for the Assessment. Further, there is no indication in the data of noise sources, such as insects, that might not be present at other times of the year.

Sound Level Meter Specification

The Huson review raises concern regarding the sound level meters used for the background noise monitoring. Rion NL-21 Class 2 sound level meters were used as part of the noise monitoring campaign. SA 2009 notes that, "Class 2 certified monitoring equipment provides a sufficient level of accuracy for assessing the impact of wind farms under these guidelines." SA 2021 similarly accepts the use of Class 2 monitoring equipment.

Both SA 2009 and SA 2021 further state that the lower limit of the instrument measurement range must be chosen to provide accurate measurements which might be limited by the noise floor of the data acquisition device. The lowest measurement range of the sound level meters was chosen for the noise measurements, resulting in a noise floor of less than 20 dB(A), typically around 18 dB(A). This level is comparable with other sound level meters, including the Larson Davis Model 831 noted in the Huson Review (a 17-18dB(A) noise floor is stated in the manufacturer's specification for the Model 831).

Wind Speed Range

The Huson review suggests that the assessment should be conducted between the cut-in wind speed and the **cut-out** wind speed. The assessment was conducted from the cut-in wind speed up the wind speed of **rated power** in accordance with the requirements of SA 2009 and SA 2021. Both Guidelines specify that the assessment be conducted *at all relevant receivers for wind speeds from cut-in to rated power of the WTG and each integer wind speed in between.*

Modelling Inputs and Methodology

The Huson Review raises concern regarding the inputs to the noise model. Noise predictions have been generated using the CONCAWE⁴ noise propagation model. The model considered the following parameters:

- Guaranteed sound power levels for the indicative proposed WTG make/model;
- The topography of the wind farm site and the surrounding area;
- Atmospheric conditions of 10°C and 80% humidity;
- Pasquill Stability Category F;
- Wind blowing from each WTG to each receiver at each integer hub height wind speed adjusted to 10 metres above ground level;
- Ground with a finite acoustic impedance.

⁴ Manning CJ 1981, "Report no. 4/81: The propagation of noise from petrochemical complexes to neighbouring communities", the oil companies' international study group for conservation of clean air and water in Europe (CONCAWE), Den Haag.

SA 2009 provides a default prediction method which incorporates hard ground in the noise propagation model unless justification is provided for using another input. The CONCAWE propagation model separates ground attenuation into the categories of hard ground and ground with finite acoustic impedance. CONCAWE states that hard ground should be used for surfaces such as concrete or water and all other surfaces including grass or soil should be considered as finite acoustic impedance. The ground between the WTGs and residences is not concrete or water, and therefore a finite acoustic impedance (corresponding to grass or rough pasture within the CONCAWE model) has been used.

The above inputs represent a conservative approach which over-predicts the level of noise because the guaranteed (rather than measured) sound power level is used and the assumed meteorological conditions of wind blowing from every turbine to every receiver concurrently will never occur in practice. With actual (rather than guaranteed) sound power levels and wind blowing in other directions, levels will be lower than predicted.

Compliance measurements conducted by Sonus at a number of wind farms over many years have indicated that the modelling method used in the assessment, marginally over-predicts actual noise levels and as such is suitably conservative.

As noted above, a comparison of the predictions of the CONCAWE model with the ISO9613-2 model and IOA Guide inputs (as recommended in SA 2021) indicates that the CONCAWE model produces conservative (high) predictions in comparison.

Tonality Assessment

The Huson review raises questions about the relevant standard for assessment of tonality. A tonality assessment in accordance with IEC61400-11 is not available for the indicative turbine. In these circumstances, an assessment in accordance with Annex D of ISO 1996.2: 2007 has been made. An updated assessment will be made prior to construction, when the final turbine model has been selected.

Traffic Noise Assessment

The EPA advice includes the following regarding the traffic noise assessment:

“The EPA does not have a statutory role in regulating traffic noise impacts as any EPL is premise based, however has provided the following advice on construction noise impacts in an advisory context:

- The modelling algorithm/package to predict traffic noise levels has not been provided in the NIA.*
- Based on the noise levels presented in the NIA, construction noise traffic noise impacts exceeding the recommended noise level thresholds in the Road Noise Policy (RNP – EPA, 20213) are predicted to occur. The NIA concludes that: “there is the potential the traffic noise criteria to be exceeded at any residence within: 80m of a Local Road outside of townships; or, 50m of a Local Road within townships”. The NIA then goes on to state that locations where the road traffic noise criteria may be exceeded include: “residences without identity in the Wind Farm Assessment on Saleyard Road and Darjeeling Road”. These roads are located on the northern fringe of Walcha. However, there are indications that additional residences on Thunderbolt Way, Uralla Road, Jamieson Street and EMU Creek Road are also within the offset distances likely to result in noise exceeding the RNP recommendations.*

The EPA recommends that Department of Planning and Environment evaluate the above points and determine if additional information is required to consider potential construction noise impacts as part of the planning determination.”

The road traffic noise levels presented in the Noise Impact Assessment (the Sonus Report) were conservatively predicted based on previous noise measurements of construction vehicles, adjusted based on the distance of noise sensitive receptors from the road and the traffic volumes predicted during peak construction. The predictions have now been reviewed based on the widely accepted *Calculation of Road Traffic Noise (CoRTN)* algorithm using the same inputs. The results of the CoRTN predictions confirm that the predictions presented within the report are conservative (i.e. higher than those predicted using CoRTN).

It should be noted that the Road Noise Policy criteria are designed around permanent changes to the road network (such as upgrades of existing roads or construction of new roads). While exceedances of the Road Noise Policy criteria due to construction of a large scale project (such as the Project) are often inevitable, the impacts will be temporary (even if construction occurs over multiple years), with noise largely returning to present levels once construction is completed.

Any exceedances of the Road Noise Policy criteria should therefore be considered in this context. As noted in the Sonus Report, where the Road Noise Policy criteria are predicted to be exceeded (such as during the peak construction period as considered by the Sonus Report), consistent with the approach taken for other temporary construction noise impacts, the following mitigation measures may be employed:

- Communicate with the affected community
- Establish and maintain a route into the site so that heavy vehicles do not enter noise sensitive areas for access where practicable
- Incorporate information regarding the route to all drivers prior to accessing the site and the need to minimise impacts through driver operation at certain locations
- Schedule construction traffic deliveries such that it is as evenly dispersed as practicable
- Restrict heavy vehicle deliveries to the day-time where practical, subject to the justifications for activity outside of this time as detailed in the construction management plan
- Implement driver training as part of the induction process. The training should include the requirement to avoid excessive acceleration of trucks and the use of truck engine brakes in close proximity to dwellings.

Impacts on Oxley Wild Rivers National Park

The submission by the Department of Biodiversity and Conservation includes the following regarding noise impacts within the Oxley Wild Rivers National Park:

- *Further noise assessment is required that considers anyone camping within the national park, including in areas remote from designated campgrounds, as highly sensitive receivers, and which assesses noise impact on those receivers using noise contours and attenuation relevant to those locations and uses.*
- *Turbines that are audible within the national park must be removed.*

The SEARs reference the *Noise Policy for Industry (NPfi)* as the method of assessment for noise from the Project to the National Park. The NPfi sets a criterion of 50 dB(A) for National Parks to be achieved within ‘*areas that are reasonably expected to be used by people, for example, picnic areas or walking tracks*’.

The Sonus Report includes predicted noise levels within the Oxley Wild River National Park. It adopts a 35 dB(A) baseline criterion for campgrounds within the National Park, consistent with the criteria applied by the Bulletin at permanent dwellings. This level is 15 dB(A) below the requirement of the NPfI and therefore the SEARs. In addition, the noise contours presented in the Sonus Report indicate that noise levels will not exceed 40 dB(A) within any other commonly used areas of the park (including, walking trails, lookouts or other points of interest), and will therefore also readily achieve the 50 dB(A) criterion applicable under the NPfI and therefore the SEARs.

It is therefore considered that the SEARs are satisfied with respect to noise impacts within the National Park. Inaudibility is not an appropriate or relevant consideration.



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ERM's Sydney Office

Level 14, 207 Kent Street
Sydney NSW 2000

T: (02) 8584 8888

F: (02) 9299 7502

www.erm.com