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31 March 2025

**Warrumbungle Shire Council
Briefing Note for the Independent Planning Commission
Proposed Valley of the Winds Wind Project**

Warrumbungle Shire Council (WSC) welcomes the opportunity to brief the Independent Planning Commission (IPC) on the Central West Orana Renewable Energy Zone (CWO REZ), the Council itself and the Proposed Valley of the Winds Wind Project (Project).

1. REZ Overview

There are approximately 40 renewable energy generation projects located in or immediately adjacent to the CWO REZ. Eleven projects, including the REZ transmission line, are currently to be located, at least in part, in the Warrumbungle Shire. The Project is one of these developments - see Attachment 1. Up to 10,000 construction workers are expected to be stationed in the REZ from 2026 to 2031.

2. Warrumbungle Shire

Warrumbungle LGA has a population of 9,225 (Year 2021) of which 10% are Aboriginal. The main towns are Coonabarabran (population 3,170), Coolah (1,280) and Dunedoo (1,250). The main industry is primary production. The unemployment rate at the last census was 6%. About 29% of households have a weekly income of < \$650.

Being a 'shire' council, Warrumbungle does not have the same resource capacity its two Regional neighbours and that is a major challenge when addressing the planning and assessment demands of the REZ.

There is a high level of awareness in the community regarding the proposed REZ developments. Over the past three (3) years Council has invested significant resources in engaging with EnergyCo, Department of Planning, Housing & Infrastructure (DPHI), project developers, neighbouring councils and our residents and ratepayers. Since the transmission line project was approved in June 2024 additional time has been spent engaging with ACEREZ. The three-year engagement has been intense, providing advice on inputs to EISs, reviewing the adequacy of EISs, reviewing Responses to Submissions, reviewing Amendment Reports, negotiating planning agreements, reviewing draft Conditions of Consent, IPC Hearings, meeting with local communities and meeting with Ministers and other authorities, etc.

3. Main Issues – REZ General

The main REZ - related issues for WSC and its communities are:

- a) **Keeping project-related traffic on the consented access routes and off non-consented local roads.** Project workers find the shortest routes and will use non-consented local roads as 'rat runs'. Our local roads, generally described as 'minor roads', are often rudimentary, of gravel construction, narrow, winding and only designed for minimal traffic movements. Additional traffic will likely cause major damage. Local ratepayers should not have to carry the cost generated by major developments. WSC requests that the IPC be explicit regarding which roads are permitted to carry Project-related traffic and which are not. In addition, the consequences of non-compliance on this matter need to be severe, otherwise ratepayers are left to pay an additional and unfair cost;
- b) **Ensuring local roads that are prescribed as access routes are upgraded, at the developer's cost, to the standard prescribed by WSC and are repaired and maintained to that standard for the life of the Project, especially post construction, post upgrading/repowering and post decommissioning;**
- c) **Ensuring cumulative impacts arising from the REZ projects are properly quantified and the local communities are fairly compensated.** The potential adverse cumulative impacts (environmental, social and economic) associated with changing a 200-year old rural region to a quasi-industrial one are very significant.

Please note that on 16 May 2024 WSC was advised by DPHI that the Department was to conduct 'front-end' comprehensive Cumulative Impact Assessments for the SW REZ and NE REZ. Such a study for the CWO REZ has yet to be completed.

- d) **Ensuring environmental, social and economic costs associated with REZ projects are carried by the developers and not outsourced to local residents and ratepayers;**
- e) **Ensuring there are commensurate social and economic benefits flowing to the LGA; and**
- f) **Having its voice heard and acted upon by the various government authorities and the developers.**

4. Main Issues- Proposed Valley of the Winds Wind Project (including BESS)

WSC carefully evaluated the EIS and made the merit-based decision that the EIS was inadequate, thus the lodging of an objection. Traffic impact assessment was inadequate as was the assessment of impacts on local accommodation availability (no accommodation camp was proposed initially). The key concern was – and remains - cumulative impacts arising from this plus a dozen other REZ projects in and adjacent to Warrumbungle Shire.

5. Cumulative Impacts

Generally, the NSW EP&A Act's focus is on project-level assessments, in isolation from other developments. Thus, cumulative impacts that arise from multiple developments across a broader, regional space and over time tend to be overlooked. This has never been more evident than in the CWO REZ. For instance, in the south-western corner of Warrumbungle Shire there are seven REZ projects in a sight cluster.

Unequivocally a broader, strategic approach is urgently required, both for the CWO REZ and all other REZs across NSW. Managing cumulative impacts also requires collaboration between the various layers of government, industry and the community, which is not reflected in the current approach.

More specifically, each REZ project is only required to consider the cumulative impacts as they relate to their own project and others that have already been approved or 'nearly' approved. That is an unreasonable task for individual developers as they operate in a competitive market and the other developers are reluctant to share key data, thus the cumulative impact assessments conducted are unsatisfactory.

In relation to the cumulative impacts across the REZ arising from some 40 quasi-industrial projects, the main concerns are as follows:

- Impacts on local roads. This includes the significant increase in maintenance post construction, post upgrades/repowering and post decommissioning, and the resultant costs;
- Socio-economic impacts, including:
 - impacts on emergency services – police, fire brigade, ambulance, medical services, etc;
 - impacts on the availability of medical and other social services;
 - social and amenity impacts on the local residents; and
 - impacts on the social and cultural fabric of the Shire;
- Environmental impacts, including but not limited to cumulative flora, fauna, and habitat loss, particularly impacts on threatened species, greater potential for bio-security impacts such as weed dispersal, groundwater and surface water impacts and cultural heritage impacts;
- Visual impacts of multiple renewable energy projects on private properties, important local features and the public domain;
- Acoustic impacts resulting from multiple renewable energy projects close to homes, as well as increased traffic movements;
- Economic impacts, including effects of a reduction in the supply chain of local services and materials needed for other local construction projects; and
- The increased risk of grass and bushfires because of the increased human activity and climate change.

Now, with accommodation camps in play, WSC wonders just how much money non-local workers will spend locally. WSC also wonders just how much business will be provided to local suppliers.

The best effort to date on assessing cumulative impacts was initiated by Mid-Western Regional Council which funded its own study in late 2023. See link:

<https://www.midwestern.nsw.gov.au/files/assets/public/v/1/development/mwrc-managing-the-impacts-of-ssd-final-v.01.pdf>

It predicted the cumulative impacts for just the Mid-Western LGA alone were:

Ambulance:

- need up to 30 additional paramedics in the peak construction period (2026)
- need a median of 4 additional paramedics over the next several years
- likely to be up to 800 additional responses in the peak construction period (2026)

GPs:

- need up to 8 additional GP FTEs in the peak construction period (2026)
- Need a median of one additional dedicated GP FTE per annum

Hospital beds:

- Need up to an additional 8 Emergency Department bays and 7 nurses in the peak construction period (2026)
- Likely to be an additional 5,085 ED presentations in 2026

Police:

- Will need more due to increases in traffic incidents, potential incidents occurring at TWAs.

WSC notes the following statements in the DPHI's Assessment report on pages 63 and 64 (WSC's emphasis added):

- *NSW Government confirmed in its Renewable Energy Transition Update (November 2024) that it has committed to undertaking cumulative impact studies for the Central-West Orana, New England and South West REZs. **These studies will identify ways for the Government to support host communities by identifying specific actions and plans that can be implemented to alleviate the potential pressures of cumulative impacts on local and regional infrastructure and services. It is intended that this will address issues like traffic and transport, housing and workforce accommodation, social infrastructure and services, water security and waste management.***
- *Cumulative traffic impacts during the construction phase are a key issue with development within the CWO REZ. The Transport Assessment conducted a cumulative impact review of adjacent approved developments using common traffic routes, including the Liverpool Range Wind Farm, Ungula Wind Farm, Wollar Solar Farm, Stubbo Solar Farm and Dunedoo Solar Farm. **The review found that there is ample spare capacity on the Golden Highway to cater for estimated future traffic volumes.***

In relation to the second bullet point, could the IPC please ask the DPHI did that assessment of the Golden Highway also include all other CWO REZ project-related heavy vehicle traffic? Because they will all use the Golden Highway. It is mis-leading and deceptive to not include it.

Furthermore, please be aware that wind farms in the South-West REZ (Hay, Balranald, etc) are also going to use the Golden Highway for transport. (The Port of Newcastle is the only port with 100m plus laydown areas for wind turbine blades). Was that traffic included in the assessment? If not, why not? Surely it should have. WSC does not support the proposition that the Golden Highway has, or will have, based on the short-term upgrade plans, "ample spare capacity". Rather, even now, road safety is compromised when travelling on that highway (for instance inadequate overtaking spaces and very few slow traffic lanes).

Given the critical nature of the need for REZ-wide robust cumulative impact assessment and the identification and implementation of prudent mitigation measures, and enhanced road safety risks on the Golden Highway, WSC urges the IPC to not approve this Project until such time as:

- a) the Golden Highway cumulative traffic types and volumes (CWO and SW REZs) are re-calculated with revamped upgrade measures committed to; and
- b) cumulative social impact assessment and mitigation actions are implemented to alleviate the pressures on local and regional infrastructure and services.

6. Roads

It would appear that DPHI and the Developer have heeded WSC's advice on the road upgrade and maintenance requirements, hence we have no objection to the roads and traffic-related Conditions of Consent as drafted and circulated to the IPC.

7. Planning Agreement

WSC agreed on Key Terms in relation to securing a Planning Agreement with the Developer on 28 February 2024. WSC provided a draft of the full document (~20 pages) to the Developer on 1 July 2024 and has been keen to finalise the document ever since. However, the Developer has wanted to wait until after a planning decision on the project is reached before finalising.

The issue with that approach is that if approval is granted, the focus for the Developer shifts to building the project and resolution of the other numerous details in the Planning Agreement tends to stall, with the Developer holding more of the negotiating power. WSC would appreciate your support in encouraging the Developer to finalise the Planning Agreement as soon as possible.

If the IPC has any queries regarding the above, please don't hesitate to contact Ms Leanne Ryan, Director Environment and Development Services on email

[REDACTED]

See Attachment 1 over page.

Attachment 1: Proposed Renewable Energy Generation Projects & Transmission Projects Planned for Warrumbungle LGA

No	SITE	HOST COUNCIL	MW CAPACITY	CIV (\$)
1	Liverpool Range WF Mod approved	95% WSC 5% UHSC	1,332	3.4 Bil
2	Valley of Winds WF	100% WSC	943 + 320MW BESS	3 Bil
3	Orana WF Project being revised	90% WSC 10% MWRC		
4	Spicers Ck WF Approved	91% DRC 9% WSC	730 + 400MW BESS	2.5 Bil
5	Dapper SF EIS due 5/25	90% WSC 10% DRC	300 + 300 MW BESS	1 Bil
6	Sandy Ck SF	60% WSC 40% DRC	700 + 700MW BESS	2.4 Bil
7	Avonside SF Project being revised	100% WSC		
8	Cobbora SF EIS due 4/25	90% WSC 10% DRC	700 + 400MW BESS	1.8 Bil
9	Dunedoo SF Approved	100% WSC	55 + 60MW BESS	100 Mil
10	Birriwa SF Approved	95% MWRC 5% WSC	600 + 600MW BESS	1 Bil
	Total Generation Capacity of above		6.172 GW	
11	EnergyCo 5.84 GW Transmission Line		Approved	5.4 Bil

DRC = Dubbo RC; MWRC = Mid-Western RC; UHSC = Upper Hunter SC