

Coonabarabran:

14-22 John Street
Coonabarabran NSW 2357

PO Box 191
Coonabarabran NSW 2357

ABN: 63 348 671 239



Calls from within Shire
1300 795 099

Calls from outside Shire area
Coonabarabran:
02 6849 2000

Coolah: 02 6378 5000

Fax: 02 6842 1337

Email:
info@warrumbungle.nsw.gov.au

Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

Please address all mail to:
The General Manager

Please refer enquiries to: **Leeanne Ryan**

14 April 2025

Mr Richard Pearson
Panel Chairman – Proposed Valley of the Winds Wind Farm Project
Office of the Independent Planning Commission
Suite 15.02, Level 15
135 King Street
SYDNEY NSW 2000

Dear Mr Pearson and Panel Members

Valley of the Winds Wind Farm (VoW WF) Assessment

In relation to this matter, as you are aware, Warrumbungle Shire Council (WSC) has previously provided a Briefing Note to the IPC, had a meeting with the Panel and spoken at the IPC Meeting held at Coolah. WSC invites the IPC to please consider the messages therein.

WSC now takes this opportunity to now provide a written submission, solely on the topic of cumulative impact assessment (CIA). As the IPC would have noted at the Coolah meeting, there were numerous speakers who referenced CIA.

WSC asserts that there is a material and significant procedural error in the assessment process conducted to date by the DPHI, namely that the strategic level, REZ-wide CIA has not been conducted for the CWO REZ, as is required by the NSW Government's stated policies and procedures (*CIA Guidelines for State Significant Projects*, dated October 2022 refers). Yet, the DPHI continues to process the assessment and determination of numerous CWO REZ projects, including referring them to the IPC for decisions.

WSC refers to the transcript of the meeting between the IPC and Ms Nicole Brewer of the DPHI dated 2 April 2025, in which she states "*The Department **is undertaking cumulative impact studies for the Central-West Orana REZ, and these studies identify ways for government to support those host communities by **identifying specific actions and plans** that can be implemented to alleviate the potential pressures of the cumulative impacts on local and regional infrastructure and services.***"

She goes on to say "*Those studies **are currently being finalised** and they'll set an **agreed baseline and projections of those cumulative impacts which will then be used by the relevant agencies and councils to develop those sort of responses and solutions.***"

Mr Pearson, quite reasonably, asked Ms Brewer “*so, what happens if those cumulative impact studies identify a need for specific projects to contribute towards resolving these issues and they already have their approvals? For example, you know, this project is going to generate impacts that some of which, many of which we’re obviously addressing through the project approval.*”

But it could be, could it not, that there would be a requirement for them to other things at a regional scale. Is that being envisaged, or is this all going to be dealt with on budget allocation by agencies?”

Ms Brewer said in response, inter alia, that:

- a) *“I think that’s something that the agencies are working through at the moment, to work out what those **solutions might be** and how they might be funded.*
- b) *I understand that those **studies are being finalised at the moment.***
- c) *I think that those studies, I understand, will become available in the short term.”*

WSC has added the emphasis.

To summarise, whilst the strategic-level (ie whole-of-government) CIA required to support planning and development decisions in the CWO REZ is currently being undertaken, it has not been completed. Furthermore, the critical mitigative on-the-ground, definitive actions have not been identified.

Only after such strategic level work is done should the local scale, project-level CIA be undertaken.

It is worth remembering there are 40+ generation and transmission projects within or just outside the CWO REZ, a region that has been rural for 200 years. So there are potentially very significant REZ-wide impacts.

We also note that the NSW Govt obviously considers strategic CIA studies are important, because such studies have been announced to be conducted for the NE REZ and the SW REZ, however their development is several years behind the CWO REZ.

To conclude, WSC submits that given the State Govt’s CIA Guidelines have not been followed for the CWO REZ projects, with strategic-level CIA missing, that constitutes a material procedural error and thus WSC calls on the IPC to:

1. Postpone further consideration of the VoW WF proposal until such time as the tasks listed below are completed.
2. The DPHI agrees to lead, undertake and complete, the strategic, whole-of-government assessment (REZ-wide CIA), in accordance with the MoU between DPHI and the IPC dated 2/3/2023; Clause 5.2.2 refers; or
3. If necessary, the Commission undertakes those activities listed in point 2 above and any additional assessment, with the DPE Planning Group providing support (MOU Clause 5.4.4); and
4. Require the DPHI to withdraw its current Assessment Report and update it in accordance with the findings and actions arising from the Strategic, whole-of-Government CIA report, including the remedial, mitigative actions designed to address the identified impacts.

If you have any queries in relation to the content above please don't hesitate to contact WSC's Director Environment and Development Services, Ms Leeanne Ryan on [REDACTED]

Yours sincerely

[REDACTED]

**LINDSAY MASON
GENERAL MANAGER**