



12 June 2025

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***Edward River Council Submission – Pottinger Wind Farm | SSD-59235464 |  
Booroorban NSW 2710 - Independent Planning Commission***

Thank you for allowing Edward River Council (ERC) the opportunity to provide advice in relation the Pottinger Wind Farm – SSD-59235464 (the Project), located approximately 60km south of Hay in Booroorban, situated across the Hay Shire and Edward River Local Government Areas.

It is understood that the Project seeks approval for a development of a 247 turbine wind farm with a generating capacity of 1,300 MW and a 500MW battery energy storage system and associated infrastructure. It is understood Pottinger Energy Park was awarded an Access Right of 831MW to the Project EnergyConnect Transmission network within the South West REZ. Council understands the Department of Planning, Housing and Infrastructure (DPHI) has completed its whole-of-government assessment of the development, and the Application has been referred to the IPC as the decision-maker as the development received more than 50 unique public objections during public exhibition.

Edward River Council support the Project and are committed to further supporting sustainable development, economic growth and appropriate land use planning, and appreciate the ability to contribute to the IPC process for this Project. Council has reviewed the information published by the IPC and DPHI, including the recommended conditions of consent, and make the following submission:

**Social and Economic Impact**

Council request consideration be given to the social impacts as a direct and indirect result of the development, which include (but not limited to) housing and accommodation, access to health services, and overall economic impact and employment opportunities to facilitate the development.

Housing and Accommodation

Consideration for short term and long-term housing stock is a significant challenge within the Edward River LGA and will be exacerbated by the volume of contractors/staff/executives anticipated during construction, post-construction, and during any layover and change of shift period (FIFO arrangements).

Within the Accommodation Strategy, Council request that the proponent conduct investigations into legacy housing as an alternative to the proposed accommodation camp, such as adaptive reuse of short-term housing, and longer term community



housing investments to be considered (i.e. Adaptive reuse of short term accommodation, moveable dwellings and repurposing into the community upon completion of construction, and/or reuse for seasonal workers accommodation).

#### Access to Health and Emergency Services

Council request provisions be made on-site for access to health services (i.e on-site nurse/s, GP, paramedics) to minimise the impact and increased demand on existing services within the surrounding communities.

Council would anticipate there be an intention to retain additional health services (i.e through funding/legacy agreements etc) to support our local communities and this be considered by the Proponent and as a result of the development.

#### Access to Radio/Telecommunications

Council requests the development does not cause impact to existing radio or telecommunication services as result of oversaturation from contractors/staff/accommodation camp during the construction period or in perpetuity.

NOTE: Comments have been made below in relation to the recommended condition of consent.

#### Economic Impact

The Project should not cause disruptions to existing businesses and surrounding enterprises, have an adverse impact on access to major routes to service centres, or disruptions for local water markets (consumptive water). Further, Council requests a comprehensive Employment Strategy be conducted prior to the commencement of construction work, and request the Proponents collaborate with the adjoining REZ Developers to minimise cumulative impacts on accommodation, health and other services during peak construction periods.

#### **Transport**

Consideration for the cumulative impact on existing enterprises and agricultural operations be further considered, including but not limited to:

- Existing and proposed road conditions, consideration for wet-weather access, likely conflicts during peak agricultural periods (i.e harvest);
- Localised impacts / traffic diversions for local traffic during construction to manage and minimise conflict between heavy construction traffic and local road users.

Council's Infrastructure team has been collaborating with the proponent on local traffic conditions, traffic management and movements, required road and intersection upgrades and treatments. The upgrade and maintenance of roads will be conditioned to be for the life of the Project and be the responsibility of the Proponent and at no cost to Council.

Council is concerned with damage to the road network during the construction activities. Local roads in the area have been constructed to support low traffic volumes and agricultural plant and equipment. Council requests that any upgrading of the road network should be done prior to the commencement of construction so that impact on roads is mitigated. Council requests comprehensive consultation be carried out and any upgrades on local road networks be to the satisfaction of Council.



Council's participation in the preparation of the Transport Strategy, along with TfNSW, is vitally important in ensuring that the existing use of the road network is acknowledged and maintained throughout the construction period.

NOTE: Comments have been made below in relation to the recommended condition of consent.

### **Waste**

Council request that a Waste Management Plan (WMP) be provided prior to the commencement of construction, and arrangements made with the relevant Council/s and/or waste services. Existing landfill disposal sites within the Edward River LGA are either small rural sites that are not suitable for disposal of waste from the development or is the main disposal site at Deniliquin which is near end of life in terms of available air space. This limits the volume of waste that Council would be able to receive and manage from the development.

NOTE: Comments have been made below in relation to the recommended condition of consent.

### **Water**

Potable water for the development is available from the Deniliquin Water Supply System through public access standpipes. The water would then need to be carted out to the site. Due to limitations in availability of potable water through the Water Supply system, this potable water would only be made available to support accommodation camps and human consumption activities. Water for construction purposes, including the making of concrete, would need to come from another source.

### **Voluntary Planning Agreement**

Council acknowledges and thanks the Proponent for the offer of a Voluntary Planning Agreement (VPA) to assist the community and provide long lasting benefits. As noted in Appendix 3 of the recommend conditions of consent, Council will prepare and implement a governance structure for managing and distributing any funds from the VPA.

Council notes that one of the general terms of the Applicant's VPA offer, noted in Appendix 3, is that 20% of the funding for the first five years of the project is to be spent within 20km of the site. Due to the remote nature of the site, a positive in terms of impact on communities, it is unlikely that there are projects within this 20km radius that warrant the effective and sustainable expenditure of the approximately \$2.2M in funding that would be available under this condition. Council requests that requirements regarding expenditure of funds under the VPA are included in the governance structure to be determined between Council and the Applicant.

### **Hazards**

Consideration to the environmental hazards impacting the Project site, including flood, bushfire, and technological hazards are a general concern for Council. Council request that the associated studies and reports are carried out to ensure any hazards are minimise, and the development is capable to adequately respond to events as required.



### **Comments on Recommended Conditions**

Council has reviewed the recommended conditions from DPHI, and make the following comments:

#### **Condition A14 – Subdivision**

- Council understands that the proposed BESS and switching stations will be subject to a subdivision of 40ha and 18ha respectively. As this subdivision will result in a lot less than the minimum subdivision lot size under the LEP, Council requests a suitably worded restriction on Title be imposed restricting the erection of a dwelling house on the lot, under the *Conveyancing Act 1919*.

#### **Condition B18 – Water supply**

- A review of the proposed water supply condition should be undertaken as the current condition is general.
- Council requests a Water Management Plan be created in consultation with Council and other relevant authorities prior to the commencement of construction.

#### **Condition B21 – Flooding**

- Council request the draft condition B21 include consideration for access to the site during flood events, as anecdotal evidence suggest the site and surrounding landscape is subject to flooding.

#### **Condition B36(d) – Transport Strategy**

- Sub-point (d) be revised to include the assessment of stock grids and other structures that may be impacted by heavy vehicles. This reflects the current nature of the road network in the LGA in supporting adjacent agricultural activities.

#### **Condition B38 – Road Upgrades**

- All road upgrades noted in Table 1 of Appendix 5, as well as those included in the Transport Strategy, should be completed prior to commencement of construction works. This reflects the fact that the largest impact from the development onto the local road network will occur during construction.

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#### **Condition B40 – Road Maintenance**

- The dilapidation report noted in this condition of consent must be undertaken following any upgrade works required under any other condition of consent, such as B36 and B38. This will ensure that any upgrade works are maintained throughout the construction period and not allowed to deteriorate to the pre-construction condition.
- The Applicant should enter into an enforceable road maintenance agreement with Council prior to the commencement of any upgrade works related to the local road network. This agreement would include the requirements of these conditions of consent.

#### **Condition B47 – Radiocommunications**

- Council would like clarification of the proposed timeframe for repairs/reinstatement for any disruptions to radiocommunications within the area. The proposed repair period of 1 month has been specified within the condition, however, justification to the adequacy/basis for a prolonged period to interruption would adversely impact on surrounding and existing enterprises/operations reliant on such services.
- Council would suggest condition B47 within the Recommended Conditions be reviewed, with particular focus on the suggested 1 month repair timeframe for any impact, and a reduced timeframe to reinstate/repair infrastructure be imposed.





Condition B53 – Operating conditions – Accommodation camp

- Provisions have not been made for the requirement for specific fire fighting water supply at the accommodation camp site (refer to Condition B52 regarding dedicated water storage supply at each access point to site).
- Council request water storage be required at the Camp to ensure adequate water in the event of a fire.

Condition B54 – Emergency Plan

- A copy of the Emergency Plan should be provided to the local Council prior to the commencement of works, in addition to the Local Fire Control Centre and FRNSW.
- Condition to be updated to reflect this.

Condition B56 – Waste

- A review of the proposed waste condition should be undertaken as the current condition is general.
- Council requests a Waste Management Plan be created in consultation with Council and any waste service provider prior to the commencement of construction.

Condition B58 – Accommodation Camp

- Council would like clarification/information on the intention around Condition B58(f) on what “include measures” entails.
- Council would request services are provided on site and investigated following consultation with relevant health authorities in regard to provide such services on site.

Condition B59 – Accommodation and Employment Strategy

- A copy to be provided to council, following endorsement by Planning Secretary. Condition amended to reflect this.

Condition B60 – Decommission and Rehabilitation

- Table 2: Investigation for the repurposing of the accommodation camp/infrastructure to service surrounding developments, and/or adaptive reuse by Council (i.e seasonal worker accommodation, emergency housing) within the wider community.
- A provision should be made within the condition requiring the investigation of repurposing of infrastructure/accommodation, and to be carried out in consultation with Council.

Appendix 3 – General Terms of Applicant’s VPA Offer

- Provide greater flexibility within the wording of the condition regarding the ‘20% of funding p/a will be allocated to community, organisations, educations programs and projects that will benefit the community within a 20km radius of the project boundary, for the first 5 years of the project’
  - o Wording should be amended to reflect “prioritise” the spending.

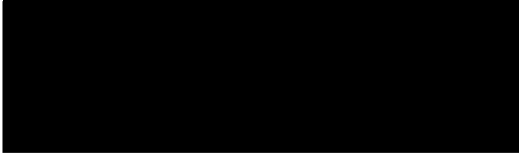
Appendix 5 – Haulage Routes and Road Upgrades

- Review proposed plan/s of road widening – Figure 9: Cobb & West Burrabogie Rd, Figure 10: West Burrabogie Road and Private Access track, Figure 11: Cobb Highway and Jerilderie Road (Hay Shire), Figure 12: Jerilderie Road and Private Access Track (Pages 49-52),
- The treatment actions noted in Table 1 are revised to show that all impacted cattle grids are replaced and upgraded, through strengthening and/or widening as required, prior to construction.



Edward River Council look forward to the review of the above submission by the Independent Planning Commission, and should further information regarding the matter be required, please contact the undersigned officer on 03 888 8880.

Yours sincerely,



**Jack Bond**  
**CHIEF EXECUTIVE OFFICER**