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Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

Please address all mail to:
The General Manager

Please refer enquiries to: L Ryan
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13 May 2022

Energy, Resources & Industry Assessments
Department of Planning
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

elisha.dunn@dpi.nsw.gov.au

Dear Elisa

Spicers Creek Wind Farm (SSD-41134610) – request for input into SEARS

On 14 April 2022 Council was forwarded a copy of the draft Planning Secretary's Environmental Assessment Requirements (SEARS) for the proposed Spicers Creek Wind Farm and asked to provide our input into the SEARS. Our comments were due back to Department of Planning (DOP) by 13 May 2022.

After reviewing the SEARS and the accompanying *Spicers Creek Wind Farm Scoping Report* dated April 2022, Council makes the following comments and seeks these matters to be included in the SEARS:

1. Any subdivision of land will need to be undertaken in accordance with relevant clauses of *Warrumbungle Shire Council Local Environmental Plan 2013 (WLEP)* for the land area involved. Council's minimum lot size for RU1 Zone is 600HA. The Scoping Study is silent and does not address this matter, it needs to be included in the SEARS.
2. There are a number of threatened ecological communities across the project site, Council expects the EIS will contain a full assessment, not just a desktop survey; and biodiversity credits will need to be achieved. The location of offsets is of interest to Council particularly if located within the Warrumbungle LGA.
3. The Cobbora Land Use Planning Strategy (Addendum to the Warrumbungle Shire Land Use Strategy) may or may not apply to part of the project area and if found to be relevant included and considered as part of the SEARS.

4. Areas surrounding the project site have presence of Aboriginal artefacts - appropriate land searches need to take place to identify any artefacts that are present to enable management and mitigation measures to be implemented.
5. Cumulative impacts on our communities, roads and local infrastructure from the developments and projects associated with the Renewable Energy Zone (REZ) are of major concern to Council. From our current knowledge of the REZ and discussions with various renewable energy developers, many proposed development timeframes appear to be aligning and will occur at the same time. Council prefers a staged approach for State Significant Development (SSD) within the REZ, and seeks for this to be included in the SEARS.
6. With two (2) LGA's involved there needs to be consideration given to the structure of the VPA. Council will be seeking for the VPA quantum to be based on megawatts (MW) generated as opposed to a payment per turbine, with the VPA covering all phases of the project; including being supportive of recognising the damage that vehicles in all phases of the project will do to our road network including bridges and major culverts.
7. Whilst the project claims to provide long-term strategic benefits to the state of NSW, a more reliable energy supply for the Warrumbungle LGA would be welcomed. Please include a clause in the SEARS that the developer is to seek initiatives to generate and provide a more reliable electricity source from the project to the local communities within our LGA. It seems at odds that our LGA is being used to generate power to be used in other areas of the State, yet our own LGA struggles to have a reliable supply.
8. For any ancillary development such as site offices, compounds, storage shed etc; construction materials should be non-reflective as per the controls within Council's Development Control Plan (DCP).
9. The stakeholder engagement list is missing some key organisations; Dunedoo Coolah Landcare, Local Emergency Management Committee, Siding Spring Observatory; these stakeholders should be included.
10. The Coolah Aerodrome has been omitted from the Scoping Study and should be noted by the Applicant, and an assessment made as to whether the proposed wind farm will have any impact on the obstacle limitation surfaces and on aerial spraying activities in the vicinity of the proposed turbines.
11. The SEARS should seek to address accommodation requirements for construction workers and others employed on the project. Minimal information on available housing and accommodation for construction workers has been included in the Scoping Study.
12. It is noted waste streams are mentioned in the SEARS, though the volumes (amount) of each waste stream has not been requested, Council seeks for this to be included. Council requests all waste materials to be recycled where possible during the life of the project.

13. The project is located within 200km radius of the Dark Sky Park associated with Siding Spring Observatory – the application needs referral to the Observatory for comment.
14. If concrete is being batched onsite (for footings for wind turbines), how much water will be required – the SEARS have not sought volumetric amounts of water to be utilised and Council requests this information is provided.
15. Plans for co-using of agricultural land subject to the development site have not been provided and Council seeks this information via the SEARS.
16. In relation to transport, Council requests the specific wording (in red) to be included in the SEARS –
 - an assessment of the capacity of the existing road network including bridges and major culverts to accommodate the type, mass (axle and gross) and volume of traffic generated by the project (including restricted access vehicles and over-mass / over-dimensional traffic haulage routes from port) during construction, operation and decommissioning;
 - an assessment of the likely transport impacts to the site access and haulage routes, site access point, any rail safety issues, any Crown Land (including existing Travelling Stock Route network) particularly in relation to the capacity and conditions of the roads, bridges and major culvert and use of rail level crossings (and rail safety assessment if required), and impacts to rail underbridges and overbridges;
 - provide details of measures to mitigate and / or manage potential impacts including a schedule of all required road upgrades (including resulting from restricted access and over mass / over dimensional traffic haulage routes), road maintenance contributions, and any other traffic control and safety measures including dust management, developed in consultation with the relevant road and / or rail authority
17. It appears that no local roads in Warrumbungle Shire will be used for heavy vehicles associated with the project. The roads utilised in Warrumbungle LGA will be the highways, though there may be some impact on the heavy vehicle rest area in Dunedoo. Additional assessment will be conducted by Council on receipt of application for HV access via the NHVR if they require access to Council's road network for restricted access and OSOM vehicles. Council would be requesting a Traffic Management Plan/Route Assessment as part of the approval process for restricted access and OSOM vehicles.
18. It is likely that light vehicles or trucks not requiring permits will use other roads than those listed in the Scoping Study. If Council roads are required to be used, Council will require additional information to assess the impact and to determine contribution required.
19. Noise impacts from heavy vehicle movements particularly in the construction phase has not been directly considered in either the draft SEARS or the Scoping Study. This is of particular importance for the community of Dunedoo.

Should you have any comments or questions in relation to the above inclusions,
please contact Council on 02 68 492000

Yours sincerely

A handwritten signature in black ink, appearing to read 'L. Ryan', with a long, sweeping flourish extending to the right.

LEANNE RYAN
DIRECTOR ENVIRONMENT AND DEVELOPMENT SERVICES