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29 May 2024

Warrumbungle Shire Council Briefing Note for the Independent Planning Commission Proposed Birriwa Solar Farm

Warrumbungle Shire Council ('WSC') welcomes the opportunity to brief the Independent Planning Commission on the Central West Orana Renewable Energy Zone (CWO REZ), the Council itself and the Proposed Birriwa Solar Farm.

1. REZ Overview

In November 2021 the CWO REZ (the first of five) was declared. On announcement, its planned network infrastructure capacity was 3GW. In 2023 that number was increased to 4.5 GW (by 2030). By 2038 the network infrastructure capacity is planned to be further increased to 6 GW. Interestingly, there was negligible engagement with Local Government in 2021 about the details of the CWO REZ or the likely flow-on consequences.

The REZ declaration established EnergyCo as the Infrastructure Planner responsible for co-ordinating the development of the REZ. Note EnergyCo is also a Developer, responsible for planning and building a major new transmission line across the REZ.

There are three main Local Government Areas associated with the CWO REZ, namely Dubbo Regional, Mid-Western Regional and Warrumbungle Shire.

There are approximately 45 renewable energy generation projects located in or immediately adjacent to the CWO REZ. About ten have been or are currently being constructed. Within or adjacent to the Warrumbungle Shire southern boundary there are currently ten proposed generation projects, including Birriwa Solar Farm. The proposed EnergyCo transmission line is also in the Shire. Approximately 10,000 construction workers are expected to be stationed in the REZ from 2026 to 2030.

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 that 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 demands of the REZ.

There is a high level of awareness in the community about the proposed REZ developments. Over the past three years an extraordinarily large amount of Council's resources has been invested in engaging with EnergyCo, Department of Planning, Housing & Infrastructure, project developers, neighbouring councils and our residents and ratepayers. That

engagement has been intense and long-running, including inputs to EISs, reviewing the adequacy of EISs, reviewing Responses to Submissions, reviewing Amendment Reports, reviewing draft Conditions of Consent, meeting with local communities and meeting with Ministers and other authorities, etc.

The table below lists the projects located, at least in part, in Warrumbungle Shire, their generation capacity and Capital Investment Value.

Proposed Renewable Energy Generation Projects & Transmission Projects Planned for Warrumbungle LGA

No	SITE	HOST COUNCIL	MW CAPACITY	CIV (\$)
1	Liverpool Range WF	90% WSC 10% UHSC	1,332	3,400 Mil
2	Valley of Winds WF	100% WSC	943 + 320MW BESS	2,300 Mil
3	Orana WF	90% WSC 10% MWRC	542 + 100MW BESS	1,200 Mil
4	Spicers Ck WF	91% DRC 9% WSC	730 + 400MW BESS	2,000 Mil
5	Dapper SF	90% WSC 10% DRC	300 + BESS (TBA)	450 Mil
6	Sandy Ck SF	60% WSC 40% DRC	750 + 750MW BESS	1,200 Mil
7	Avonside SF	100% WSC	180 + 400MW BESS	3,400 Mil
8	Cobbora SF	90% WSC 10% DRC	700 + 200MW BESS	1,000 Mil
9	Dunedoo SF	100% WSC	55 + 60MW BESS	100 Mil
10	Birriwa SF	95% MWRC 5% WSC	600 + 600MW BESS	1,000 Mil
	Total Generation Capacity of the above		6.172 GW	
11	EnergyCo Transmission Line	ALL		3.2 Bil

WSC = Warrumbungle SC; DRC = Dubbo Regional Council; MWRC = Mid-Western Regional Council; UHSC = Upper Hunter Shire Council
Dunedoo SF is approved

The main REZ related issues for Council and its communities are:

- a) The potential adverse impacts on our local roads, generally described as ‘minor roads’ as they are of gravel construction, often winding and only designed for minimal traffic movements;
- b) The potential adverse cumulative impacts (environmental, social and economic) associated with changing a long-established rural region to a quasi-industrial one. Note that on 16 May 2024 WSC was advised by DPHI that the department is to conduct a cumulative impact assessment for CWO REZ on the topics of housing/accommodation, visuals and landscape matters. Plus, it is to conduct ‘front-

end' comprehensive Cumulative Impact Assessments for the SW REZ and NE REZ. Such a study was not conducted by the State Government for the CWO REZ. The best effort was initiated by MWRC which funded its own study. See link: <https://www.midwestern.nsw.gov.au/files/assets/public/v/1/development/mwrc-managing-the-impacts-of-ssd-final-v.01.pdf> ;

- c) Ensuring environmental, social and economic costs associated with REZ projects are carried by the developers and not outsourced to local residents and ratepayers;
- d) Ensuring there are commensurate social and economic benefits flowing to the LGA;
- e) Having its voice heard and acted upon by the various state government departments and the developers; and
- f) The significant resourcing burden being carried by Council in assessing REZ developments and making considered, merit-based decisions.

3. Proposed Birriwa Solar Farm + BESS

WSC has given detailed consideration to the proposed project on numerous occasions over the past 17 months and provided advice to the DPHI and Developer as follows:

- a) Submission in Response to the EIS (Nov 2022);
- b) Feedback on the Project's Amendment Report (Oct 2023);
- c) Feedback on the Submissions in Response to the Amendment Report, plus tabled recommended Conditions of Consent – particularly on roads and traffic (Jan 2024); and
- d) Feedback on the DPHI's draft Conditions of Consent (13 May 2024).

WSC also met with the Developer on 24 Feb 2023 and 10 July 2023.

In November 2022 WSC carefully evaluated the EIS and made the merit-based decision that the EIS was significantly inadequate on the following topics, thus the lodging of an objection was appropriate.

- Roads and traffic (estimated peak of **120 heavy vehicle trips – 240 movements daily** during construction of the project);
- Workforce accommodation (28 months construction period; maximum of 500 jobs for six months. Twenty operational jobs). No designated workers camp was proposed in the EIS;
- Solid and liquid waste management; and
- Cumulative impacts (for example, use of minor local roads - colloquially called 'rat runs' – that is, those not prescribed for upgrade and/or maintenance works paid for by the developer), accommodation used by tourists, health and emergency services, solid and liquid waste, water and aggregate).

In addition, given this was the first of several REZ projects to be assessed and determined, WSC was of the view that it was important to send a clear signal to the NSW Government that the planning process had to be improved and made more robust and transparent. This factor reinforced the decision to object to the project.

For the Birriwa Solar Farm and all other REZ projects to follow, WSC wishes to see a determination that:

- i. Acknowledges the potential adverse cumulative impacts associated with all the REZ projects (for example, roads, health and emergency and other social services, solid and liquid waste, water and aggregate, accommodation, etc) and safeguards against

associated environmental, social and economic costs being outsourced to local residents and ratepayers.

Note that the DPHI did not initially require the developments to provide worker accommodation camps. The REZ Councils insisted on same to protect the accommodation available for tourist use.

Also note that the DPHI Assessment Report states there are '16 REZ projects within 25 kms of the project site' (page 5 para 11), yet it goes on to say there will be 'no material cumulative traffic impacts on the state or local road network as a result of the project' (page 25 para 111). WSC strongly disagrees with that conclusion;

- ii. Delivers tangible benefits to the Shire and its communities; and
- iii. Ensures Council's road, namely Barney's Reef Road (located within the boundary of Warrumbungle Shire Council, north of the boundary with Mid-Western Regional Council) and the Castlereagh Highway intersection is upgraded to designs approved by WSC and funded by the Developer and maintained at no cost to Council during project construction, project upgrading or refurbishment works (i.e. activities that trigger heavy vehicle use not normally associated with routine operations) and project decommissioning activities.

WSC urges the IPC to interrogate the developer and the DPHI on **how** traffic will be regulated to actually stay on the prescribed roads and not use other, non-approved roads. The Assessment Report says there will be 'no significant impacts on road network capacity, efficiency or safety' (page 26 para 113) because, inter alia, project related vehicles will be restricted to the use of the approved access route only (page 26, para 112). What compliance measures have been mandated and how will they be enforced? These will be absolutely essential to safeguard these road assets owned by Local Government.

WSC will table suggested amendments to the DPHI's recommended Conditions of Consent with the IPC in the near future.

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 Leanne.Ryan@warrumbungle.nsw.gov.au.