

Submission – SSD-41743746-MOD-2

Yanco Delta Wind Farm (Modification 2)

Balranald Shire Council

1. Position Statement

Balranald Shire Council acknowledges the strategic and economic importance of renewable energy development, including wind farm projects, in contributing to regional employment, energy security, and national decarbonisation objectives.

Council is not opposed to the project in principle.

However, Council's support is **conditional** on ensuring that:

Local communities, infrastructure and economies are **not left bearing unfunded costs, operational disruption, or long-term liabilities** arising from construction and operational impacts.

2. Strategic Context – Local Infrastructure Capacity

Balranald Shire Council manages an extensive and financially constrained rural road network and associated infrastructure assets. Council's asset management framework highlights the importance of sustainable lifecycle funding, risk management, and service level delivery across transport and community infrastructure.

The MOD 2 documentation (including references to Council infrastructure and assets on pages 40 and 169) identifies that the project will:

- Generate significant heavy and OSOM (Over-Size Over-Mass) vehicle movements
- Utilise state and local road networks, including the Sturt Highway interface and local connectors
- Require intersection upgrades, road widening, and traffic management measures

While mitigation measures are proposed, **experience across regional NSW** indicates that:

Residual impacts frequently transfer cost and risk to local government unless explicitly prevented through enforceable conditions.

Yanco Delta Wind Farm (Modification 2)

3. Key Issues and Required Conditions

3.1 Balranald Township Impacts & Bypass Consideration

The Sturt Highway through Balranald is a critical freight corridor and community interface.

The current proposal **does not** adequately address:

- The cumulative impact of OSOM transport movements through the township
- The interaction with local traffic, pedestrians, and business activity
- The future escalation of traffic volumes associated with renewable energy development in the broader region

Council Position:

- A Balranald bypass strategy must be formally investigated and costed, including developer contributions where appropriate. Whilst challenging, as both road and Crown reserves currently exist, and the eastern third (1/3rd) of the bypass is completed, it isn't an insurmountable task.
- Without a bypass, at minimum, township impact minimisation measures must be mandated, including:
 - Defined haulage routes avoiding sensitive areas
 - Physical traffic management **infrastructure upgrades**

3.2 Timing of Vehicle Movements

Construction traffic, particularly OSOM movements, presents a high risk to:

- Safety
- Freight efficiency
- Community amenity
- Our CBD economy

Council requires enforceable conditions that:

- Restrict OSOM and heavy vehicle movements during:
 - Peak freight periods on the Sturt Highway
 - Community peak times (shopping hours)
- Mandate staggered and coordinated logistics scheduling across proponents

Yanco Delta Wind Farm (Modification 2)

Without this:

There is a material risk of network congestion, increased crash risk, and disruption to interstate freight movements.

3.3 School Time and Community Safety

Heavy vehicle interaction with school zones is a critical risk issue.

Council requires:

- Absolute prohibition of OSOM and heavy vehicle movements during:
 - School start and finish times
 - Shopping hours
- Mandatory school zone traffic management plans
- Funding for additional safety infrastructure, including:
 - Signage
 - Crossing improvements
 - Traffic control where required

3.4 Public Transport and Workforce Movements

The MOD 2 proposal identifies workforce mobilisation, but does not adequately resolve:

- Reliance on private vehicle movements
- Lack of integration with regional transport systems

Council requires:

- A workforce transport strategy that prioritises:
 - Bus transport for workers
 - Reduction of light vehicle traffic volumes
- Clear commitments to **minimise cumulative road impacts**

This aligns with broader project commitments in similar EIS documentation to manage workforce transport and logistics.

3.5 Disruption to Industry and Freight (Sturt Highway)

The Sturt Highway is a nationally significant freight route, supporting:

Yanco Delta Wind Farm (Modification 2)

- Agricultural supply chains
- Regional transport businesses
- Interstate logistics

Impacts from OSOM and construction traffic include:

- Delays to freight operators
- Increased operating costs
- Reduced reliability of supply chains

Council Position:

- The proponent must demonstrate minimal material degradation of freight efficiency
- A Freight Impact Mitigation Plan must be required, including:
 - Real-time coordination with TfNSW
 - Advance notification systems for freight operators
 - Avoidance of peak freight windows

3.6 Traffic Diversion onto Local Roads

A critical but often underestimated impact is:

Unintended diversion of traffic onto local roads to avoid OSOM movements.

This creates:

- Accelerated deterioration of local roads
- Safety risks on roads not designed for increased traffic
- Direct financial burden on Council

Council requires:

- Modelling of traffic diversion behaviour
- Identification of all at-risk local roads
- Binding commitments that:
 - The proponent funds all maintenance and upgrades
 - Any damage attributable to project traffic is fully remediated at no cost to Council

Yanco Delta Wind Farm (Modification 2)

4. Infrastructure Protection & Cost Recovery

The proposal includes commitments to road upgrades and maintenance contributions. However, experience indicates these are often:

- Front-loaded (construction phase only)
- **Insufficient for whole-of-life impacts**

The EIS for comparable projects acknowledges the need for:

- Road upgrades
- Ongoing maintenance contributions
- Traffic management measures

Council Position (Non-negotiable):

- **A legally binding Road Maintenance Agreement must be executed, covering:**
 - **Pre-condition surveys**
 - **Ongoing monitoring**
 - **Full cost recovery for damage**
- Financial mechanisms must ensure:
 - No net cost to Council
 - Coverage of long-term asset degradation, not just immediate impacts

5. Economic Considerations

Council acknowledges the project's potential to:

- Provide regional employment
- Stimulate local economic activity
- Support broader energy transition objectives

Similar major projects in the region demonstrate:

- Direct and indirect economic benefits
- Potential to utilise existing service capacity in regional communities

Yanco Delta Wind Farm (Modification 2)

However:

Economic benefits must not be offset by unfunded infrastructure liabilities.

6. Conclusion

Balranald Shire Council supports renewable energy development **where it is responsibly planned and delivered.**

For this project to proceed with Council support, the following principles must be met:

1. **No cost shifting** to Council or the community
2. **Protection of local infrastructure assets**
3. **Maintenance of freight efficiency on the Sturt Highway**
4. **Safety of residents, particularly school children**
5. **Effective management of cumulative and indirect traffic impacts**

Without these safeguards:

The project risks delivering regional economic benefit at the direct expense of local government sustainability and community wellbeing.