

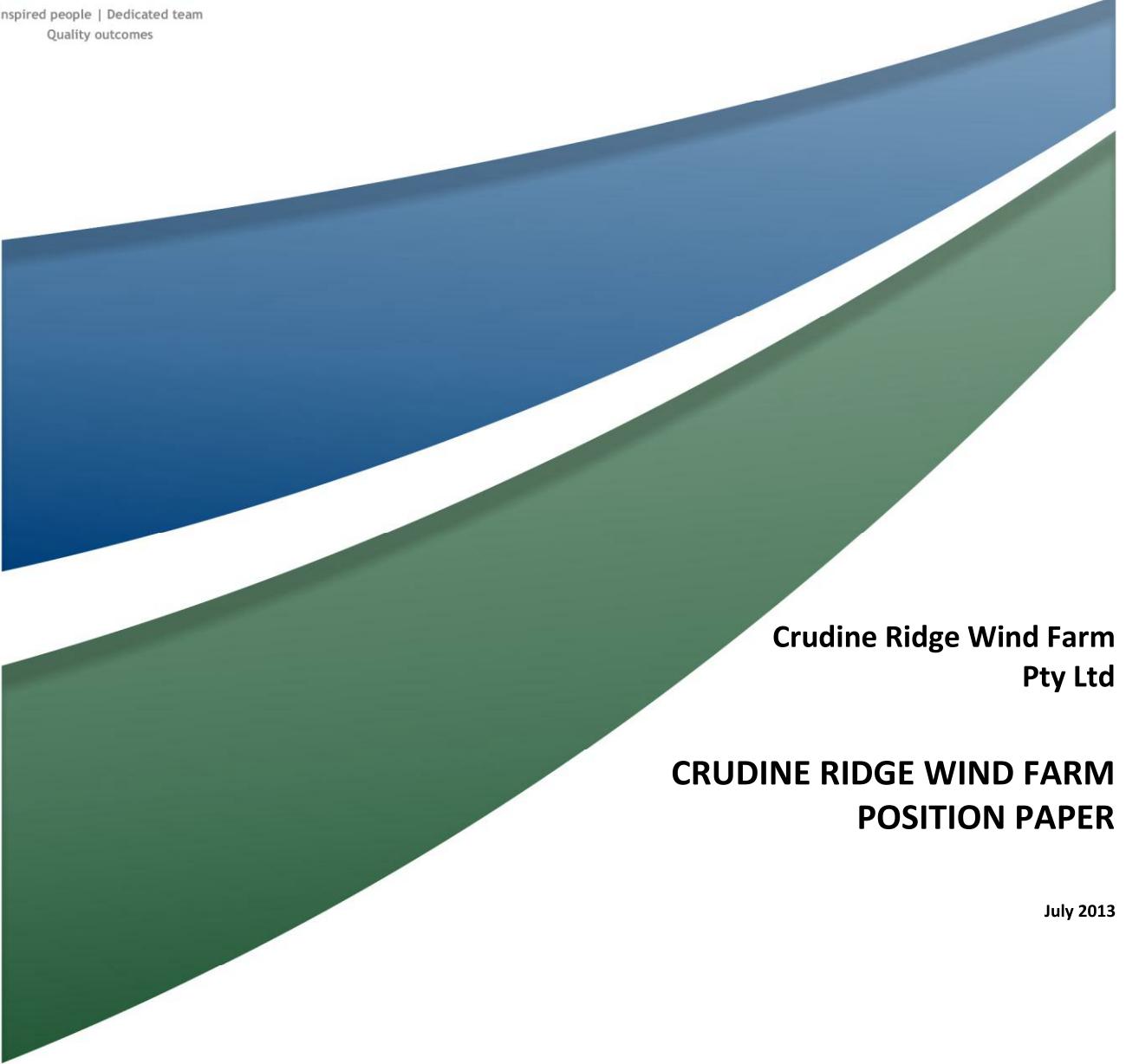
APPENDIX 5

Crudine Ridge Wind Farm Position Paper

Umwelt (Australia) Pty Ltd



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**Crudine Ridge Wind Farm
Pty Ltd**

**CRUDINE RIDGE WIND FARM
POSITION PAPER**

July 2013

Crudine Ridge Wind Farm Pty Ltd

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July 2013

Prepared by
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1.0 Introduction

1.1 Project Background

Crudine Ridge Wind Farm Pty Ltd are proposing to develop Crudine Ridge Wind Farm (CRWF), a wind farm of up to 106 turbines and ancillary structures, approximately 45 kilometres south of Mudgee in the area of Crudine near Pyramul. The project is undergoing assessment under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Crudine Ridge Wind Farm Environmental Assessment (EA) was placed on public exhibition from 12 December 2012 until 19 March 2013, for a total of 14 weeks over the Christmas break. Approximately 125 direct submissions were received; 97 objections, 21 comments and 7 in support of the project. Additional submissions and comments were also provided via the Mid-Western Region Council (MWRC) submission.

Umwelt has been engaged to undertake a comparative analysis of the project with another major project within the MWRC Local Government Area (LGA), this being the Ulan Coal Mine Continued Operations Project (UCOP) which was approved in 2011.

The purpose of the current analysis is to provide contextual information regarding the predicted social impacts of CRWF and UCOP in order to inform discussions about scale of impact, and potential for wider community benefits including potential contributions to ongoing community infrastructure development and maintenance within the LGA.

1.1 Methodology

In order to provide a comparison between the CRWF and UCOP and situate the analysis within a local community framework, a review of secondary data was undertaken. Documents include:

- *Proposed Development of Crudine Ridge Wind Farm; Central New South Wales* (Wind Prospect CWP 2012) – the Environmental Assessment (EA) undertaken for the project, with particular reference to Chapter 6: Stakeholder Consultation and Chapter 19: Socio-economic Assessment;
- *Crudine Ridge Wind Farm Traffic and Transport Study* (Samsa Consulting 2012) for further analysis of construction workforce numbers and schedules;
- *Ulan Coal Continued Operations Project: Socio-economic Impact Assessment and Community Consultation Program* (Coakes 2009) which was undertaken as part of the wider EA for the UCOP. Methodological differences between this and Wind Prospect (CQP 2012) are discussed further in **Section 3.0**;
- *Mid-Western Regional Council - Local Services Assessment* (Menidis Roberts 2012) in order to situate the analysis within a local community framework;
- A range of government statistics sources, including the 2011 census (Australia Bureau of Statistics 2011), tourist accommodation data (Australia Bureau of Statistics 2013), and small area labour market data (Department of Education, Employment and Workplace Relations 2013);
- A number of community and other submissions to the CRWF EA received by the Department of Planning and Infrastructure (DPI), including that from MWRC; and

-
- Other data sources as referenced throughout the document in order to provide wider contextual information regarding Social Impact Assessment (SIA) and other themes as necessary.

The review of this documentation informs a discussion around the social impacts of the two projects, with a particular focus on social impacts due to population changes caused by incoming construction and operational workforces as discussed in **Section 2.1** and **Section 2.2** respectively. This comparison on social impacts is then placed within a local community framework with reference to Manidis Roberts (2012) local services assessment within the region in **Section 3.0**, and informs a discussion regarding contemporary Voluntary Planning Agreement (VPA) outcomes in **Section 4.0**.

It is not the purpose of the review to comment on concerns regarding social amenity due to anticipated noise and dust impacts, nor to provide analysis on what would be considered best practice regarding VPAs in the region. In addition, it is assumed that the SIA undertaken for the UCOP project correctly predicted any social impacts that may have occurred since its production in 2009. It does not provide an analysis of the relevance of the 2009 SIA report to the current year, nor does it consider the experiences of living with the UCOP post approval.

1.2 Predicting Impacts and Social Change

Guided by the *International Principles for Social Impact Assessment* (Vanclay 2003, p. 2), SIA includes:

The processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions ... and any social change processes invoked by those inventions. Its primary purpose is to bring about a more sustainable and equitable biophysical and human environment

SIA includes analysis of a wide range of potential impacts. In addition to impacts to the environment and how these are experienced, social impacts also include impacts to (see Vanclay, 2003):

- people's way of life;
- their culture;
- their community;
- their political systems;
- their health and wellbeing;
- their personal and property rights; and
- their fears and aspirations.

As with all planned interventions and developments, the CRWF and UCOP are responsible for some of these impacts. It is also acknowledged that as visible examples of wider social changes, at times some impacts may be attributed to projects such as the CRWF and UCOP that are not directly caused by the project itself. For example, while amenity impacts from a mine may be attributed as causing a decrease in population within a rural township, the population decrease may actually be caused by an aging population downsizing to smaller properties closer to hospitals and other infrastructure. While population changes due to the project may occur, other non-project processes of social change may already be occurring within the locality.

It is the role of SIA with respect to major projects such as the CRWF and UCOP to:

- identify what processes of social change are occurring in a given area;
- what impacts may occur due to a project;
- how these interact; and
- how these may be avoided, minimised, mitigated, or facilitated depending on the nature of the impact or change.

This document compares the SIAs undertaken for the two projects, namely:

- the predicted impacts resulting from each project;
- the existing processes of social change within the MWRC region; and
- any measures proposed to manage the impacts within local communities.

There are many aspects that make up the social impact of a given project. These include direct influences on social amenity such as noise, dust or traffic which are specific to the proximity of the project. When extreme, these influences may also be considered potential impacts to human health and/or safety. More broadly, other aspects such as stressors to social infrastructure such as doctors, dentists, schools, childcare, motels and other facilities, as a result of workforce change associated with a project, are often felt by local communities who may not have any direct relationship with the project. Furthermore, at a broader scale, changes to the demographic makeup of a given area such as changing economic status, age, education and population require equal attention to direct impacts, such as dust and noise, when assessing impacts as well as the development of appropriate management strategies.

Impacts to social amenity such as noise, dust and traffic can be managed by project specific strategies, however wider impacts like stressors to social infrastructure or wider demographic change require a whole-of-community response, if impacts are to be appropriately managed or opportunities are to be effectively realised. It is often the local Council that is well placed at the whole-of-community level to manage such impacts or realise such opportunities.

Planning Agreements are also often a mechanism to facilitate the contribution of the proponent to the wider community response to particular impacts and opportunities between proponents and councils. Planning Agreements include those under Section 94 or Section 94A of the EPA Act, VPAs that may include (Department of Infrastructure Planning and Natural Resources 2005):

- compensation for loss or damage caused by the development;
- meeting demand created by the project;
- prescribing inclusions within the development;
- providing planning benefits to the wider community; and/or
- recurrent funding.

2.0 Workforce and Population Change

One main driver for stress on social infrastructure and demographic change is increases or decreases in population due to the workforce required to construct and/or undertake the operation. While the UCOP involved substantial changes to the existing Ulan mine with regard to both construction and operation workforce levels, the CRWF has a smaller number of anticipated construction personnel and an operational workforce level of less than 4 per cent of the additional operational workforce proposed under the UCOP.

When compared in terms of ‘job years’, being the number of Full Time Equivalent (FTE) positions created each year of construction or operations, CRWF proposes a 133 job years during a two year construction period and a total 448 job years over a 21 year period, and UCOP proposed 825 construction job years over a three year construction period, and an additional 8421 job years over a 21 year period.

2.1 Construction Workforce

In order to provide an accurate comparison between anticipated construction workforces, assumptions and calculations to determine the demand on local services employed by Coakes (2009) have been replicated with regard to the CRWF construction workforce. Key relevant data are included within **Table 1**.

Table 1 – Construction Workforce Parameters

Parameter	CRWF	UCOP ¹
Construction Staff (Average period)	50	220
Construction Staff (Peak period)	100	350 ²
Construction period (Years)	2	3.75
Construction job years (FTE employees x length of construction)	133	825
Anticipated peak local workforce (20%)	20	70
Anticipated peak workforce from outside the region (80%)	80	280
Incoming peak workforce staying in Mudgee (15%)	12	42
Increase to population in Mudgee over construction period	0.12%	0.43%
Maximum annual construction light vehicle movements (daily)	40 ³	972
Maximum annual construction heavy vehicle movements (daily)	21 ³	12

1: Coakes (2009) provide an in depth analysis of anticipated influences due to the construction workforce. For the purposes of this table only combined onsite and offsite construction numbers have been used.

2: Includes 270 onsite and 80 offsite employees.

3: Annual average. CRWF construction anticipated to peak over four month bracket with 80 light and 113 heavy vehicles per day

(Coakes Consulting 2009; Samsa Consulting 2013; Wind Prospect CWP 2012).

In 2009 Coakes undertook a survey of temporary accommodation providers and determined that of the 546 rooms available within the local area, with an average 63 per cent usage rate, a remainder of 202 rooms were available for the UCOP onsite construction workforce. Coakes determined that while there were insufficient *rooms* for the 270 onsite construction workers, there were sufficient *beds* at 395 beds available across accommodation establishments during the construction period.

Replicating the Coakes (2009) analysis, there is sufficient capacity within current establishments within the local area to accommodate all construction employees anticipated for the CRWF project. The *Tourist Accommodation, Small Area Data, NSW* for the December Quarter 2012 (Australian Bureau of Statistics 2013) indicates a room occupancy rate of 67.3 per cent within the Mudgee Statistical Local Area (SLA). This is equivalent to 90 rooms currently available in Mudgee SLA alone, not including the remainder of the MWRC LGA or Bathurst LGA. In addition, Coakes (2009, p. 123) report that ‘all [accommodation service providers] expressed very positive responses and enthusiasm over the prospect of accommodating additional clientele in the event of a population influx in the area’.

Similarly to Coakes (2009), employees and contractors undertaking construction for the CRWF are not anticipated to bring families, and consequently long term loading on social infrastructure is not anticipated to be significant with regard to construction populations. Also, as construction workforces are anticipated to be engaged on a contract basis, CRWF anticipates engaging local contractors as available, and those from outside of the region if required for specialist skill sets. Due to the short term contracts for the proposed construction, the reported current skills shortage due to employment demand at nearby coal mining operations including UCOP is not anticipated to prevent the construction of the proposed CRWF.

In addition, the total 61 projected daily vehicle movements during the construction peak for CRWF is significantly less than the total 984 projected daily vehicle movements during the construction peak for UCOP. While it is acknowledged that nearby residents may experience amenity impacts, it is not anticipated that additional traffic caused during construction of the CRWF will significantly impact on the community or existing social infrastructure.

It is noted that the MWRC present concerns regarding the sourcing and housing of the CRWF construction workforce in paragraphs 8.3 and 8.5 of their submission dated 7 March 2013 (MWRC 2013). It is considered that the temporary CRWF construction workforce is unlikely to have significant negative impact on temporary accommodation within the MWRC LGA.

2.2 Operational Workforce

The CRWF has an anticipated operational workforce of 15 persons. This is 3.8 per cent of the anticipated additional operational workforce, and 1.6 per cent of the anticipated total operational workforce under the UCOP project (Coakes 2009). Coakes (2009) posit a ‘worst case’ scenario of 75 per cent of the UCOP workforce relocating from outside of the local area (300 employees) and undertake a detailed demographic scale analysis of predicted population changes that may occur under the UCOP project scenario. Should 75 per cent of the proposed operational staff at the CRWF be sourced from outside of the local area the increase of 11 employees and their families would account for a calculated 27 persons across the MWRC and Bathurst LGAs, using an average household size of 2.4 consistent with the *Australian Census of Population and Housing* (Australian Bureau of Statistics 2011) for the MWRC LGA. A comparison between the CRWF and UCOP assuming ‘worst case’ scenario employees and their families were to reside in the MWRC LGA are provided in **Table 2**. Assuming the ‘worst case’ scenario, select statistics are calculated within **Table 3**.

Table 2 – Operational Workforce Numbers

	CRWF	UCOP
Operational Employees	15	401 ¹
'Worst Case' employee immigration	11	301
'Worst Case' local employment	4	100
Predicted Family Impact	27	915 ¹

1: Additional employees anticipated for project as calculated by Coakes (2009). Ulan Mine peak total operational employees 931

(Coakes Consulting 2009; Wind Prospect CWP 2012).

Table 3 – Select Statistics Under 'Worst Case'

	MWRC	Percent Change Under CRWF Proposal	Percent Change Under UCOP Proposal
Total persons	22318	0.12%	4.10%
Total Dwellings	10843	0.10%	2.78%
Total Labour Force	9930	0.11%	3.03%
MWRC Unemployment Rate ¹	5%	0.04%	1.01%

1: As of December 2012.

(Australian Bureau of Statistics 2011; Coakes Consulting 2009; Department of Education, Employment and Workplace Relations 2013; Wind Prospect CWP 2012).

It is acknowledged that as of December 2012, the MWRC area was approximately at 'full employment', being 95 per cent of the workforce employed (Manidis Roberts 2012; Department of Education, Employment and Workplace Relations 2013). December 2012 corresponds with the peak overlap of the UCOP construction and operations anticipated within Coakes (2009). The anticipated commencement of construction works of the CRWF in 2014/15 as scheduled within the Traffic Study (Samsa Consulting 2012) is one to two years after the peak construction workforce of the UCOP has left the area.

Given the small numbers of operational employees and family members, more detailed analyses of social infrastructure loadings or comparison with the UCOP becomes difficult, as the levels of impact are within normal variations of population levels as provided within **Table 4**. In addition, in consideration of the current reported skills shortage; as a non-mining operation, CRWF has considered the likelihood of potential workers preferring higher wages offered by mining operations. Nonetheless the project is considered viable and if sufficient employees are unable to be sourced locally then workers from outside of the local area will be found as is assessed above.

Table 4 – Population Change in the MWRC LGA 2001 – 2012

Year	MWRC Population
2001	22180
2002	22202
2003	22099
2004	21972
2005	21977
2006	22074
2007	22242

Table 4 – Population Change in the MWRC LGA 2001 – 2012 (cont.)

Year	MWRC Population
2008	22458
2009	22654
2010	22821
2011	23000 ¹
2012	23461
Change 2001-2012	1281 (5.5%)
Change 2011-2012	461 (2.0%)
Proposed CRWF Contribution to 2012 population	27 (0.1%)
Proposed UCOP Contribution to 2012 population	915 (3.9%)

1: Calculated within *Regional Population Growth Estimates* (Australian Bureau of Statistics 2012) and differs from that indicated by the Australian Census of Population and Housing (Australian Bureau of Statistics 2011).

(Australian Bureau of Statistics 2012)

The shortage of affordable housing caused by patterns of boom and bust due to resource extraction operations poses major challenges for those managing housing supply (AHURI 2009). This is not only due to the decreasing number of available properties for rent or purchase, but also due to the changing socio-economic status of areas as prices increase and those less able to afford higher quality housing move to lower quality or transient housing options. Nonetheless, it is considered that a proposed change of up to 11 households under a ‘worst case’ scenario is unlikely to significantly affect MWRC housing availability or affordability.

As long term increases are within anticipated population projections and no significant changes to property rental or purchase affordability or availability are predicted, no corresponding mitigation measures are recommended.

3.0 Crudine Ridge Wind Farm within a Local Community Framework

Manidis Roberts (2012) provides a local services baseline assessment in the context of increasing mining industry in the local area. Aside from noting three proposed wind farms in and around the MWRC LGA, no consideration of wind farms is made within the document. The report provides a snapshot of existing social and other infrastructure needs and provisions, and extrapolates future requirements under the scenario of increasing mining activity over the next 20 years. In contrast, the CRWF is proposing an average construction workforce of 50, with a peak construction workforce of 100 for eight months during 2014-2015. As construction ends, the operational workforce of up to 15 employees will commence. The effective assessment of the temporary CRWF construction workforce against the Manidis Roberts (2012) data is not possible given the long term perspective within the Manidis Roberts (2012) report. A preliminary assessment regarding the proposed 15 operational roles within the context of the Manidis Roberts (2012) report indicates that the increases in infrastructure loading due to the 15 operational employees and their families is not of sufficient significance for Council to change current or planned infrastructure developments, or require significant mitigative measures.

More qualitative social impacts, such as those listed above from Vanclay (2003), are often more difficult to ascertain than demographic change. In order to provide some insight into other potential impacts such as those relating to land value, distributed economic impacts, tourism and health impacts, WPG provided a presentation of secondary data of experiences in similar wind farm contexts and from wider literature. This is a different methodological approach to Coakes (2009), who provided an in depth analysis of the qualitative inputs from the community consultation. A comparison between potential impacts raised and how they were responded to in the respective SIAs is provided in **Table 5**. As shown within **Table 5**, significant differences between projects and their anticipated impacts exist and have been assessed using different methodologies.

Table 5 – Comparison of Assessment Considerations

	CRWF	UCOP
Decreasing Land Value	Wind farms do not appear to negatively affect property values. Wider economic considerations may in fact raise values and/or compensate for losses.	Fear of land values decreasing near the mine, but also opposite concern that increased demand of housing would increase land values.
Distributed economic impacts	The project will result in distributed economic benefit to the local community as local procurement will occur where possible.	Significant flow on economic benefit to the local area from mining operations.
Tourism	Other experiences of wind farms have lead to increased tourism.	Impact of mining on aesthetics of local area meaning reduced tourism, but increased population may facilitate further tourism opportunities.
Health	Whilst acknowledging an annoyance factor, research shows that there is no direct causal link between wind turbines and impacts to human health.	The UCOP would lead to increased stresses on existing health infrastructure.
Community Wellbeing	Positive impacts to community wellbeing through distributed economic impacts through construction period and 'community fund'.	Concerns relating to cumulative impacts from mining compared to distributed economic impacts throughout the wider community.

(Coakes 2009; Wind Prospect CWP 2012).

4.0 Recent VPA Outcomes

To date VPAs have been made on an ad hoc and context specific basis, and are currently under review through the NSW government changes to the planning system (NSW Government 2013). As presented in Figure 3 of Manidis Roberts (2012) contributions from mining operations in the MWRC area vary greatly, with contributions for community infrastructure, road maintenance and upgrades, as well as other contributions. These are compared with the 'Community Fund' proposed as part of the CRWF, and the VPA requests from MWRC as per paragraphs 10.2 and 10.4 of their submission dated 7 March 2013 (MWRC 2013) in **Table 6**. The proposed 'Community Fund' is an ongoing contribution program of \$1,250/MW per year administered by a committee consisting of council and local community representatives to ensure that funds are spent appropriately within the local area.

**Table 6 – Comparison between VPA Agreements and Proposed CRWF
‘Community Fund’**

Project	VPA – Social Infrastructure	VPA – Road Maintenance	Calculated Total Over 20 yr Period	Operational Employees
Moolarben	\$750,000	\$1,000,000	\$1,750,000	196
Ulan	\$3,475,000	\$1,050,000	\$4,525,000	459
Wilpinjong	-	\$650,000	\$650,000	346
Charbon	\$16,611 p.a.	\$0.01/tonne, plus \$0.05 public rd or \$0.77 highway levy	\$632 220 (not inc. public/highway levy)	149
CRWF	\$168,750 p.a. ¹	-	\$3,375,000	15
MWRC VPA Request	\$257,000 p.a.	\$636,000	\$5,776,000 ²	-

1: Assumes construction of 135MW of power at \$1,250/MW/yr as proposed within the EA.

2: Calculated over 20 year period for consistency instead of 25 year period as with MWRC submission. This does not include additional amounts of \$500,000 and \$25,168,000 as mentioned by MWRC in paragraphs 1.3 and 1.16 respectively (Manidis Roberts 2012; MWRC 213; Wind Prospect CWP 2012).

One method of comparing VPA and community contributions is through comparison of employment levels. Assuming a level of investment in social infrastructure directly related to the number of employees and corresponding stress on social infrastructure, the CRWF Community Fund proposes contributions over 100 times higher than those of local mining operations. For example, if UCOP provided total VPA contributions of the order proposed by CRWF per employee, they would provide contributions in the order of \$103,275,000. If CRWF proposed contributions of a similar scale per employee as UCOP –the highest VPA contributions per employee out of the compared operations – a total contribution of approximately \$147,900 would be expected.

However VPAs are often made with regard to more than meeting demand created by the project or planning benefit, but also for compensation for damage caused by the development, road maintenance, etc. (Department of Infrastructure Planning and Natural Resources 2005) or through negotiation with Council regarding areas of need and enhancement. It is noted at this point that annualised peak construction traffic movements for the proposed CRWF are 4.1% of that approved for UCOP as presented in **Table 1** and further detailed by Samsa Consulting (2013). This difference grows substantially when compared across operational traffic movements. Accounting for the comparative traffic impacts as well as the comparison between the ‘community fund’ and UCOP VPA above, it is considered that the scale of proposed ‘community fund’ is sufficient with regard to the minimal social impacts as described within the EA.

The current development contribution system was developed with the key concepts of reasonableness and accountability in mind (DIPNR 2005), with the concept of reasonableness in contributions based upon the principles of nexus and apportionment. However, under the current contributions system there is no requirement for planning agreements to be founded on the principles of nexus and apportionment. The NSW Government has recognised that the current system of VPAs is flawed and has lead to unpredictable and unfair outcomes for proponents, which do not reflect the underlying principles of the development contribution system of reasonableness and accountability (NSW Government 2013). Specifically, the state government has identified that proponents are paying much higher contributions and that contributions are often being sought for infrastructure beyond what is directly attributable to a development (NSW Government 2013).

The NSW Government has sought to address these failings as part of the planning system review, by requiring planning agreements to be based on the principles of nexus and proportionality and limiting the scope and cost of infrastructure funded under a planning agreement.

In their submission dated 07 March 2013, MWRC (2013) has failed to demonstrate that it has appropriately considered these key underlying principles of the contribution system, in particular, MWRC has failed to demonstrate that its currently proposed VPA contribution demonstrates nexus and proportionality.

Regarding a VPA, MWRC (2013, paragraph 10.2) states; '[the VPA] amount would be paid direct to Council and used for community and social purposes and the Council sees fit'. This is a significant point of difference between the CRWF 'community fund' and MWRC's understanding of VPA outcomes. It is assumed that contributions are anticipated to be provided through a VPA or through the 'community fund', or a combination of both, but that the 'community fund' as administered by a community committee would not form part of the VPA negotiations directly. Accordingly it is recommended that Crudine Ridge Wind Farm Pty Ltd. consult further with MWRC, DPI and other agencies as relevant should they wish to replace part or all of the 'community fund' within VPA negotiations.

5.0 Conclusions

Comparison between SIAs undertaken for the CRWF and UCOP indicates that the CRWF is a substantially smaller operation than UCOP, with a different scale of social impacts, notably regarding construction and operational workforces, other social impacts and with regard to VPAs in the local area.

When compared with the UCOP, the social impacts of the CRWF construction workforce are smaller with regard to both quantity of persons and length of construction, resulting in less than 20 per cent of the construction job years. In replicating the analysis of Coakes (2009), it was considered that there would be sufficient temporary accommodation within Mudgee alone, without consideration of the wider MWRC LGA or Bathurst LGA. In addition, any potential social impacts due to the operational workforce of up to 15 persons would be minimal. This is to such an extent that replication of the Coakes (2009) analysis of loading on social infrastructure results in negligible benefit. When assessing the potential impacts to the project against the baseline and cumulative assessment within Manidis Roberts (2012), the short time frame for construction of the CRWF and the low numbers of operational employees mean that detailed analysis is neither feasible nor required. As such the existing accommodation services and other social infrastructure in the area are expected to be able to accommodate the construction and operational workforce of the project.

The SIA for CRWF was undertaken using a different methodology to the UCOP, however a comparison of the assessment outcomes draws attention to some of the similarities and differences between the projects. Similarities between the projects include perspectives in the community that the projects may either be detrimental or positive with regard to tourism, distributed economic impacts, and community wellbeing. Differences between the projects include approaches to land valuations and predicted health impacts.

The present analysis disagrees with the statement of MWRC (2013 paragraph 10.2) that "There is no doubt that this development will have a significant social, environmental and community effect on the Mid-Western Community" with regard to social impacts and 'community effect'. The comparative analysis between CRWF and UCOP, situated within a community framework context, indicates that the proposed CRWF will have minimal impacts on services and infrastructure in the region.

When compared with previous VPA agreement outcomes in the MWRC LGA as within Manidis Roberts (2012), and assessed according to socio-economic impact quantified through workforce levels, the CRWF ‘community fund’ offers substantially higher contributions than some other major projects in the area. If a similar logic was applied to both CRWF and UCOP with regard to VPA outcomes due to social impact per operational employee, CRWF would be expected to contribute a total of \$147,900 over 20 years, or \$7,395 per annum.

Informed by the present analysis it is recommended that Crudine Ridge Wind Farm Pty Ltd continue in discussions with MWRC, Bathurst Council, DPI, other government agencies and the local community with regard to the CRWF project, with specific focus on identified areas of community and agency concern.

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