

12 May 2023

Re: SSDA-57575973 – Belhaven Battery Energy Storage System

Department of Planning and Environment

Locked Bag 5022
Parramatta NSW 2124

Dear Sir/Madam,

The Department of Planning and Environment (DPE) is in receipt of SSDA-57575973 for Belhaven Battery Energy Storage System at 233 Boiling Down Road, Rowan. Wagga Wagga City Council has been requested to provide inputs into the SEARs for the proposal, including details of any key issues and assessment requirements.

Please find below the key issues and requirements identified by Council:

- **Infrastructure**

- There are a number of state significant development and infrastructure projects within this locality that are relying on the current road network to enable their delivery (including roads such as Redbank Road, Boiling Down Road, Plumpton Road and Ashfords Road). The impacts of the development should not be considered in isolation given the increasing demand on road infrastructure in this area.
- Council recommends a condition be applied at the appropriate stage of the approval pathway that requires the proponent undertake road upgrades as determined by Wagga Wagga City Council.

- **Environment**

- Council requires that the proponent works be at least 40m clear from Crooked Creek and its tributary streams.
- Council requests that the proponent adequately consider prevention of site contamination (soil, groundwater, surface water) during construction, operation and decommissioning of the batteries and transformers. It is unknown which batteries will be used on site at this point in time (Pb-A? Na-S? Li-S? or Li-ion? LiPF6 break down?) and how this may impact contamination.
- Council requests that the proponent undertake a life cycle assessment of the project/Circular Economy opportunities during the construction and decommissioning phases.
- Council requests that the proponent recognise the site is located within the Lake Albert catchment area and any application will need to have regard to the potential impact on the waterways and biodiversity values that are identified under the *Wagga Wagga Local Environmental Plan 2010*, and which are critical to the function of this catchment. Whilst the SEARs require the proponent to address biodiversity and water

generally, the scoping document is largely silent as to the significance of this catchment and any potential risks posed to it by the development.

- Council requests that the SEARs require examination of any potential impacts of the development on existing land uses, as well as the compatibility of the development with these land uses. This aspect should have particular regard to the ongoing operation of the adjacent Gregadoo Waste Management Centre (GWMC) and other proposed infrastructure projects yet to be delivered in this area. Examination of any potential impact of the GWMC on the development will be critical in determining if it is an appropriate land use within the area currently buffering the GWMC.

- **Socio-economic Impacts of the project**

- A number of significant infrastructure projects will be occurring in Wagga Wagga over the next 10 years, and these will place significant pressure on housing and accommodation options across the Wagga Wagga LGA. The Social Impact Assessment should consider:
 - the impact of accommodating the construction workforce on local housing supply;
 - the impact of accommodating the construction workforce on tourist and visitor accommodation capacity and availability;
 - the social, economic and health impacts of accommodating the construction workforce in worker camps (if proposed); and,
 - the cumulative impact of accommodating multiple major project workforces on housing supply and tourist and visitor accommodation in Wagga Wagga.

Council is able to provide information to the proponent to inform the cumulative impact **assessment** and encourages the proponent to engage with Council in relation to workforce accommodation, to enable the proponent to take a holistic approach to the assessment process.

- **Hazards**

- The scoping report states that the site does not contain vegetation that is categorised as a bushfire hazard. This is incorrect - the report includes an extract of the latest bushfire mapping, which demonstrates that the entirety of the site is mapped as containing Category 3 vegetation.
- Council requests that the proponent demonstrate that earthworks are required to establish the Flood Planning Level will not impact flood behaviour.

- **Additional Considerations for the Proponent**

Council also wishes to note several items which would be beneficial for the proponent to be aware of in preparing the relevant documentation:

- The proponent should be made aware that the 1%AEP flood mapping (as opposed to the Flood Planning Area mapping) demonstrates the site is flood-impacted. The proponent should refer to Section 11.5.2 of the *Wagga Wagga Major Overland Flow Floodplain Risk Management Study and Plan 2021* for information.
- Council notes that the site has been zoned for specific purposes (SP1 Waste Disposal Facility). Council has also enacted a statutory planning regime around the site to protect the future growth and development of the GWMC. Any proposal that has the potential to impact on the site will



need to consider this. Council compulsorily acquired land to facilitate its use as a waste management centre.

- Page 20 of the Scoping Report – Council would prefer that any required infrastructure be co-located within existing land encumbered for electricity infrastructure to minimise any further impact on the waste management operations on the site. Co-location of infrastructure would be contingent on appropriate compensation being paid to Council.

Council encourages the proponent to contact Council with any questions regarding the comments above or in relation to the project more broadly, to ensure a holistic approach is undertaken.

If you have any questions, please do not hesitate to contact Chloe Boyd, Strategic Town Planner, on 1300 292 442.

Yours Sincerely,



John Sidgwick
Director – Regional Activation

