



Office of the General Manager

LP | LAN900162

5 September 2023

Megan Ramsdale
Energy Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Megan,

SUBJECT: BERYL BATTERY ENERGY STORAGE SYSTEM (SSD-61460977) SEARs ADVICE

Thank you for providing the Mid-Western Regional Council (Council) with the opportunity to provide input into the Secretary's Environmental Assessment Requirements (SEARs) for the proposed Beryl Battery Storage System (BESS). Council has reviewed the requirements and request the following issues be specifically addressed in the Environmental Impact Assessment.

Workforce and Accommodation

It is noted in the Scoping Report that there will be an estimated 40 full-time workers at the peak of construction, with the construction period of approximately 12 months from the commencement of site establishment works. Council requests the Proponent to provide sufficient details regarding accommodation for the workforce, travel arrangements to/from the work site, parking arrangements for the construction workforce, vehicle movements, and hours of construction to be included in the EIS. In particular, socio-economic impacts on the surrounding towns, especially Gulgong, should be addressed.

Due to the current low unemployment rate of 1.7% in the Mid-Western Region, Council requests the SEARs require the Proponent to include information on where the workforce is being sourced.

The Workforce Accommodation Plan should consider that Council does not support the use of tourist and visitor accommodation for any construction workforce. A comprehensive Workforce and Accommodation Plan should be provided as part of the Environmental Impact Statement (EIS).

Mid-Western Regional Council does not support "park and ride" type purposes on public land due to insufficient car parking available in the region, and no public car parks or public road infrastructure are to be used for park and ride.

It is also requested that the Proponent consider the status and timing of all other state-significant developments within the Mid-Western Region to minimise any adverse cumulative impacts.

Water

The SEARs should require the Proponent to identify suitable water sources for construction and operation, particularly in drought periods. Water usage estimates should also provide adequate provision for drinking and sanitation purposes during the project and contingencies, such as additional dust suppression requirements during extended dry periods.

Proponents should not be relying on Council as a source of construction or potable water supply. The proponent is required to be self-sufficient in this regard.

Waste

A significant amount of waste is expected to be generated during project construction. Council requests the Proponent provide specific details regarding the expected waste to be generated during each phase, including construction waste and workforce sewage, as well as how it will be managed as part of the Environmental Impact Statement (EIS). Furthermore, a waste management plan should be developed in consultation with the Council before consent.

In this regard, Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudjee Waste Facility has limited capacity to accommodate commercial quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. Any other materials requiring disposal should be discussed with Council.

All of Council's other waste facilities are waste transfer stations accepting residential waste, which is then transported to Mudjee waste facility. They will not be suitable for waste from this project.

Community Engagement

Council requests a summary of community engagement, including attendance/participant numbers and issues raised/addressed.

Community Participation During Construction and Once Operational

Council requests the Proponent provide details on its proposed communications plan and identify mechanisms by which the community can provide feedback during construction and once operational. This should also include the Proponent's approach to dealing with complaints or compliance issues.

Biodiversity

Council requests the Proponent provide the BDAR (Biodiversity Development Assessment Report) to Council for review and comment once completed.

Visual Amenity

Council requests specific details be provided to adequately assess any visual amenity impacts that may be experienced by residents within local proximity of the project. It is anticipated that amenity will be key areas of concern for adjoining neighbours and residents. Where impacts are expected, it is requested that the Proponent provide a thorough analysis of these impacts and details on the proposed mitigation measures and management practices that will be implemented.

Council requests a comprehensive native vegetation and landscaping plan be established to ensure that the value of the natural environment, together with flexibility in land use or development, is maximised.

Consultation with Council's Environment department would be welcome to discuss suitable native vegetation endemic to the region.

Traffic, Transport and Accessibility

- The project will be located at 5 Holleys Lane Gulgong (lot 297 DP755434). Site access to the Project area would be via Castlereagh Highway, then Beryl Road or Holleys Lane, but Beryl Road would provide the primary site access for the Project.
- Beryl Road exists with 9m formation and 7m bitumen seal width. The Applicant will be required to provide to Council traffic counts for current conditions on Beryl Road.
- Holleys Lane exists as unsealed with 5m formation. The Applicant will be required to provide to Council traffic counts for current conditions on Holleys Lane and upgrade this road to being bitumen sealed.
- The road reserve for Beryl Road from Castlereagh Hwy to Holleys Lane is mapped as high conservation value. Beryl Road from Holleys Lane to potential site access point is mapped as medium conservation value. Holleys Lane is mapped as low conservation value. A detailed REF assessment will be required for these areas.
- An Oversize Overmass (OSOM) vehicle will be required to transport a transformer from the Port of Newcastle to the Project area. Details will need to be provided for the OSOM vehicle as well as other heavy vehicle transport for BESS infrastructure would use semi-trailers.
- Construction traffic would be required to avoid local bus routes near the Project area during school bus hours, including along Beryl Road.
- The Project may require temporary road work on Beryl Road between the Project area and Beryl Substation for the proposed 132 kV connection. This will require approval under s138 of the Roads Act.
- Road work may be required on the intersection of Castlereagh Hwy and Beryl Road to facilitate heavy vehicle movement and safe site entry to the Project area. This will require TfNSW concurrence or WAD.
- Road work on Beryl Road intersection with Castlereagh Hwy and Beryl Road to facilitate heavy vehicle movement and safe site entry to the Project area. This will require approval under s138 of the Roads Act.
- The Applicant will be required to enter into agreement with Council for Council to perform ALL road upgrade construction works.

Matters to be considered in the application regarding traffic.

The Applicant must undertake a detailed traffic assessment of Castlereagh Hwy, Beryl Road, Holleys Lane including cumulative impact assessment of peak average daily traffic generation (AADT), including existing traffic conditions + forecast project generated traffic by ALL REZ (Renewable Energy Zone) projects + OSOM/heavy vehicle movements + worker transportation. To complete this the Applicant will be required to undertake a traffic counts program for existing AADT on Castlereagh Hwy (at the intersection Beryl Road), Beryl Road and Holley's Lane.

All road upgrade works to be sealed, including Holleys Lane, at the cost of the Applicant and will require approval under s138 of the Roads Act. Any road upgrades to the Castlereagh Hwy intersection will require TfNSW concurrence.

Road upgrades to Beryl Road and Holleys Lane must be in accordance with Austroads Guide to Road Design. The following standards will apply.

SINGLE CARRIAGEWAY RURAL ROADS*

Element	Design AADT	Design AADT	Design AADT	Design AADT	Design AADT
	1-150	150-500	500-1000	1000-3000	➤ 3000
Traffic lanes	3.7 (1 x 3.7)	6.2 (2x 3.1)	6.2-7.0 (2 x 3.1/3.5)	7.0 (2 x 3.5)	7.0 (2 x 3.5)
Total Shoulder	2.5	1.5	1.5	2.0	2.5
Maximum Shoulder Seal	0	0.5	0.5	1.0	1.5
Total carriageway	8.7	9.2	9.2-10.0	11.0	12.0

Widening of carriageways on curves to suit heavy vehicles may be required. Private land acquisitions (if necessary) for road widening and/or re alignment is at the cost of the Applicant.

All road upgrade works must be completed prior to issuing construction approval for the energy infrastructure and will require approval under s138 of the Roads Act.

Prior to issuing s138 approval for road upgrade works Council will require from the Applicant the following:

- the detailed assessment of any transport impacts to the site access routes, site access points particularly in relation to the condition and capacity of the roads, road safety and performance.
- a geotechnical report confirming existing pavement conditions and upgrade road design to support max OSOM.
- design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed accesses to the development are designed to accommodate the turning path of the longest vehicle entering and exiting the site.
- evidence the Applicant has completed any land acquisition necessary for the road infrastructure upgrade works.
- a detailed REF assessment, including environmental assessment and cultural heritage assessment, of any roadside environment to be impacted by the road upgrades to the site access routes.

Prior to issuing s138 approval for electrical transmission infrastructure within the road reserve Council will require from the Applicant the following:

- design plans to the satisfaction of the relevant road's authority.
- evidence the Applicant has completed any land acquisition necessary for the infrastructure upgrade works.
- a detailed REF assessment, including environmental assessment and cultural heritage assessment, of any roadside environment to be impacted by the works

Other conditions:

Prior to the commencement of any construction, the Applicant must:

- (a) seek concurrence from TfNSW for any works to the intersection at Castlereagh Hwy;

- (b) Consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection, and support of the affected infrastructure;
- (c) Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, drainage); and
- (d) Submit a copy of the dilapidation report to the Planning Secretary, Certifier and Council.

Protection of public infrastructure - Unless the Applicant and the applicable authority agree otherwise, the Applicant must:

- (a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development, including excessive wear and tear to roads; and
- (b) Relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated because of the development.

Protection of property - unless the Applicant and the applicable owner agree otherwise, the Applicant must repair, or pay the full costs associated with repairing any property that is damaged by carrying out the development.

Council has a draft policy titled 'Major Projects Road Upgrade Policy' to ensure developers are aware of Council's intent to undertake road upgrades on local roads within the Council area. Works will be at the cost of the Proponent.

Decommissioning and Rehabilitation

Council requests a planned removal and site restoration plan, so that the impacts of the development are accurately assessed. Council, as well as residents, should have confidence that the land could be returned to agricultural use. It is appropriate for such a plan to be prepared and conditioned to include the following, at a minimum:

- The anticipated present value cost of decommissioning works, along with an explanation of the calculation of that cost (including a buffer for changes in market values/inflation).
- The physical plan for decommissioning, prepared or certified by an engineer confirming that full remediation/recovery of the site to its former primary production use/class land capability is possible.

Cumulative Impacts

In addition to the above, Council wishes to ensure significant consideration of the cumulative impacts of this proposal in conjunction with other approved and upcoming major projects in the region. The assessment should include, but not be limited to, the following cumulative impacts:

- Environmental impacts of the project, including but not limited to cumulative flora, fauna, and habitat loss, particularly impacts on threatened species, increased risk of grass fire escape and spread with loss of woodland communities, greater potential for bio-security impacts such as weed dispersal and new incursions on the site and surrounding agricultural areas, increased risk of feral animal incursion and impacts to stock, wildlife and human safety, groundwater impacts, contamination effects, waste disposal impacts, and cultural heritage impacts including Aboriginal and European heritage.

- Visual impacts of multiple renewable projects on private properties, important local features, and the public domain. This should encompass all State Significant Developments, not just wind projects.
- Land use conflicts resulting from multiple renewable projects in the area, which may impact primary production and rural-residential land uses.
- Transport and traffic impacts arising from multiple renewable projects on State, Regional, and local roads. This includes the significant increase in maintenance and resources required by the Council for project-related roads during both the construction and operation phases.
- Tourism impacts that affect local accommodation availability and the unique character of the Gulgong area. The area's appeal to tourists relies on its strong connection to heritage significance, scenic rural landscapes, and agriculture.
- Economic impacts, including effects on agricultural land availability, property devaluation, and reduction in the supply chain of local services and materials needed for other local construction projects.
- Acoustic impacts resulting from multiple renewable projects close to residents, as well as increased traffic movements.
- Social and amenity impacts the community with a large workforce, including unskilled workers temporarily located in the region to support the projects.
- Consideration of medical, educational, and other social service impacts should be considered.

Council requests the Proponent to engage with Mid-Western Regional Council to discuss a formal Voluntary Planning Agreement.

Should you have any further enquiries regarding this matter, please contact Council on (02) 6378 2850.

Yours sincerely,



JULIAN GEDDES
ACTING GENERAL MANAGER

230905 Beryl BESS SEARs Advice

Final Audit Report

2023-09-05

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