



Office of the General Manager

LP | LAN900140

25 September 2023

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

Dear Megan,

SUBJECT: Advice on Environmental Impact Statement; Bellambi Heights Battery Energy Storage System.

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to comment on the Environmental Impact Statement (EIS) for Bellambi Heights Battery Energy Storage System (**SSD-33344237**). Council has reviewed the documents and would like to provide feedback for consideration.

Workforce Accommodation Strategy

APPENDIX Q Accommodation Strategy notes the following content:

This strategy will be delivered through the preparation of, and adherence, to an Accommodation Plan developed in consultation with Council and other stakeholders no later than one month before construction.

The strategy is to accommodate the workforce within and around Gulgong, before considering options further afield in Mudgee, Wellington, or Dubbo. Options for accommodation would include motels/hotels, caravan parks, and renting privately owned dwellings.

Council is disappointed in the lack of detail in this document and advises it does not meet the needs of Council to provide relevant feedback on suitability. Council therefore requests that a detailed workforce and accommodation plan be developed and approved by Mid-Western Regional Council prior to the issuing of any consent for the project.

It should be noted that Council does not support the use of tourist and visitor accommodation for the construction workforce. 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.

Waste

The EIS notes (2.7) estimated waste to be less than 25 tonnes (t) and less than 3.2 t of construction waste to be disposed at Mudgee landfill.

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 Mudgee 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.

All of Councils other waste facilities are waste transfer stations accepting residential waste, which is then transported to Mudgee waste facility. They will not be suitable for waste from this project. Any other materials requiring disposal should be discussed with Council.

Construction hours

The EIS notes (Table 3.1) Construction hours exceptions may be made for low impact works and extraordinary circumstances.

Council requires more detail on what low impact works comprise of.

Potable Water

The EIS notes (3.4.1 vi), approximately 0.1 ML of potable water is required. The proponent should not depend on Council as a source of potable water supply. The proponent is required to be self-sufficient in this regard.

Disposal of Sewage

The EIS notes (3.4.1 vii) possible disposal of sewage to Gulgong Sewage Treatment Plant (STP).

Council advice is that Gulgong STP does not have any facilities to receive septage or sewage collected/tankered from sites not serviced by the town sewage collection system. In the Mid-Western Region, Mudgee STP is the only site that can receive such tankered waste.

Council requires the developer to have suitable sewage treatment and treated effluent application facilities onsite without sewage transfer to Council facilities, as Mudgee STP has no capacity to accommodate additional loading at this point in time.

Community Enquiry Management

The EIS notes (5.9.3) Continued enquiry management. The existing VEA management process via the dedicated project phone number, website, and email will remain active during assessment and for a period of time following determination.

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

Biodiversity

The EIS notes (6.1) A biodiversity development assessment report (BDAR) has been prepared by EMM.

Given the low impact on the removal of fragmented CEEC, Council accepts the proponent's plan to offset biodiversity loss through payment into the Biodiversity Fund, rather than through the preferred option of like for like credits.

Council requests that all stockpiled soil retained on site for later rehabilitation purposes be covered with locally endemic native groundcover mix to reduce the threat of weed incursion and other biosecurity threats from externally sourced seed mixes.

Visual Impact Assessment

The EIS notes (6.5.1) A visual impact assessment (VIA) was prepared by Iris Visual Planning + Design.

Council has considered the Visual Impact Assessment and supports the recommendation that neutral shade colours are used for the battery enclosures, switching station and buildings on site to reduce their prominence in any views to the project.

Council acknowledges that no screening measures are considered necessary owing to the factors listed in ES6.5 Visual Impact. However, Council recommends 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. A multi-level screening planting strategy would be an integral part of the project to protect the visual amenity within the region. Early-stage planting and diligent care during construction will help ensure the survival and proper growth of these plants. Adequate screening not only enhances the visual appeal of the project, but also minimises potential negative impacts on the surrounding landscape and neighbours. Species choice is important, and ideally should be native vegetation common to the area. It is imperative that an appropriate management plan accompanies any vegetation planting initiatives.

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

Traffic

The EIS Notes in APPENDIX L Traffic Impact Statement.

Puggoon Road:

In Table 1.3 page 9 - Puggoon Road is noted as not to be utilised, and a new site access is proposed from Castlereagh Highway.

Haulage routes, traffic generation and impact assessment are discussed in Section 4.4, 4.1.7 and 5.1, respectively.

Section 3.3, 3.4 assessment of Puggoon Rd / Castlereagh Hwy intersection performance would therefore seem of no value to this project.

Council request confirmation that Puggoon Road will not be utilised by any traffic (light or heavy vehicle) in either direction, and Section 3.3 and 3.4 be removed from the report.

Vehicle Movements

The EIS notes (3.4.1 viii b) assumption of peak hour construction vehicles movement, 20 light vehicle trips during the morning and evening peak hour (20 in 20 out) assuming all construction workers will arrive and depart the site during the AM and PM peak hours.

This is in conflict with the ES6.7, which states 40 in and 40 out. With a workforce of 100, this is either 5 people per vehicle or 2.5 people per vehicle.

Council requires further detail information on the construction workers' vehicle movements prior to the issue of consent for this project.

Pending the resolution and acceptance of this section, 4.4 traffic peak hour traffic distribution is to be reassessed using reasonable assumptions for traffic generation of:

Light vehicles

Heavy vehicles

OSOM (Over Size Over Mass)

Any resulting design for left turn treatment BAL and/or right turn treatment BAR will require TfNSW concurrence and will require the Applicant to enter directly into a works agreement (WAD) with TfNSW that the works are to be completed prior to commencement of any works within the site.

The above traffic generation is to take into account peak hour traffic on Castlereagh Hwy, including existing conditions plus cumulative traffic generation of this project generation, together with other REZ (Renewable Energy Zone) projects planning to utilise the Castlereagh Hwy for worker transportation and/or transport of plant, parts, or materials. A revised traffic impact assessment will be required to be provided for approval prior to the issuing of Consent.

Park and Ride

The EIS also notes that a shuttle bus will be in operation outside peak hours, and Council requests more information regarding the shuttle bus. It must be noted that 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.

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

Yours sincerely,

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a long horizontal stroke extending to the right.

BRAD CAM
GENERAL MANAGER